



Peninsula Light Co.
a mutual corporation

May 22, 2023

John Hairston
Administrator and CEO

Suzanne Cooper
Senior Vice President of Power Services

Kim Thompson
Vice President of Northwest Requirements Marketing

Submitted via email to post2028@bpa.gov

Dear Administrator Hairston, Ms. Cooper, and Ms. Thompson:

Peninsula Light appreciates the opportunity to provide comments on BPA's workshops held over the past year.

This correspondence represents the third letter Peninsula Light has submitted to BPA regarding the proposed treatment of new, specified, dedicated resources – underscoring the gravity of the impact on Peninsula Light and its members.

Peninsula Light made the determination for the Regional Dialogue contract to build a resource as part of its long-term resource strategy. The development of customer resources was part of the framework of the Regional Dialogue contract and to that end, Peninsula Light invested a significant sum in a long-term commitment to its power portfolio. Utilities that make long-term resource investments understand there are far-reaching financial and operational implications which more than likely do not fit neatly within the timeframe of a new power contract. As such, it is important for BPA to align policies from the Regional Dialogue contract with its policies for a new Provider of Choice contract. A seamless transition in this regard is imperative to ensure customers are not harmed at the outset, and for the duration, of a new power contract.

Peninsula Light does not understand why BPA proposes to punish utilities that followed the tenets of the Regional Dialogue contract. BPA's proposal means that instead of utilizing Harvest Wind to meet its Tier 2 load, Peninsula Light would have to invest in yet another new resource or bring in another non-federal or federal resource to meet its ARHWM need. Nowhere in our calculus was there an input that at the end of the existing Regional Dialogue contract, our new resource would revert from being used for Tier 2, to decrementing our access to Tier 1 power; that would not have been a viable business model we would have brought to our Board.

Peninsula Light's position and request continues to be that BPA provide 100% credit to utilities that added new resources during the Regional Dialogue Contract.

Peninsula Light values the dialogue that has transpired to date between BPA and public power. We ask BPA staff to please consider if the lack of movement around its proposal regarding new, specified, dedicated resources is truly being responsive to public power's concerns and interests.

Thank you,



Sharon Silver

Power Resources Manager