

Affiliated Tribes of Northwest Indians  
AirWorks, Inc  
Alternative Energy Resources Organization  
American Rivers  
Beneficial State Bank  
BlueGreen Alliance  
Bonneville Environmental Foundation  
Byrd Barr Place  
Cascadia Consulting Group  
City of Ashland  
City of Portland Bureau of Planning and Sustainability  
City of Seattle Office of Sustainability & Environment  
Clean Energy Transition Institute  
CleanTech Alliance  
Climate Action Families  
Climate Smart Missoula  
Climate Solutions  
Coffman Engineers  
Community Action Center of Whitman County  
Community Action Partnership of Oregon  
Community Energy Project  
Consolidated Oregon Indivisible Network  
Earth Ministry  
Ecumenical Ministries of Oregon  
eFormative Options  
Electrify Now  
Elevate  
Energy350  
Energy Trust of Oregon  
Environment Oregon  
Environment Washington  
FlexCharging, Inc.  
Forth  
Gallatin Power  
Global Ocean Health  
Green Energy Institute at Lewis & Clark Law School  
GRID Alternatives  
Grid Forward  
Homes for Good  
Home Performance Guild of Oregon  
Human Resources Council, District XI  
Idaho Conservation League  
Idaho Organization of Resource Councils  
Idaho Rivers United  
League of Women Voters Idaho  
League of Women Voters Oregon  
League of Women Voters Washington  
McKinstry  
Montana Audubon  
Montana Environmental Information Center  
Montana Renewable Energy Association  
Multnomah County Office of Sustainability  
National Center for Appropriate Technology  
Natural Resources Defense Council  
New Buildings Institute  
Northern Plains Resource Council  
Northwest Energy Efficiency Council  
Olympia Community Solar  
OneEnergy Renewables  
Opportunity Council  
Oracle/Opower  
Oregon Citizens' Utility Board  
Oregon Energy Fund  
Oregon Environmental Council  
Oregon Physicians for Social Responsibility  
Oregon Solar + Storage Industries Association  
Pacific Energy Innovation Association  
Portland Energy Conservation, Inc.  
Portland General Electric  
Puget Sound Cooperative Credit Union  
Renewable Hydrogen Alliance  
Renewable Northwest  
Save Our *wild* Salmon  
Seattle City Light  
Sierra Club  
Sierra Club, Idaho Chapter  
Sierra Club, Montana Chapter  
Sierra Club, Washington Chapter  
Small Business Utility Advocates  
Smart Solar Energy  
Snake River Alliance  
Snohomish County PUD  
Solar Oregon  
Solar Washington  
South Central Community Action Partnership  
Spark Northwest  
Spokane Neighborhood Action Partners  
Sustainable Connections  
The Climate Trust  
The Energy Project  
UCONS, LLC  
UMC, Inc.  
Union of Concerned Scientists  
United Steelworkers of America, District 12  
Utilidata  
Washington Conservation Action  
Washington Physicians for Social Responsibility  
Washington Solar Energy Industries Association  
Washington State Community Action Partnership  
Washington State Department of Commerce  
Washington State University Energy Program  
Yellowstone-Teton Clean Cities



**NW Energy Coalition**  
*for a clean and affordable energy future*

August 8, 2024

Bonneville Power Administration  
P.O. Box 14428  
Portland, OR 97293  
prdm@bpa.gov

Re: NW Energy Coalition's Initial Comments on the Public Rate Design Methodology (PRDM) Rough Draft

Dear PRDM Team:

The NW Energy Coalition (NWECE) appreciates the opportunity to provide initial, high-level feedback on Bonneville Power Administration's (BPA) rough draft of its PRDM, introduced at the August 1, 2024 workshop. NWECE greatly appreciates the hard work BPA has undertaken to design the PRDM, as well as the work and engagement of all affected stakeholders who have attended PRDM workshops to date.

The formulation and implementation of the PRDM in place of the Tiered Rates Methodology (TRM) will help should enhance BPA's ability to meet the needs of its customers and the region. NWECE applauds BPA for working hard to structure changes to the TRM in the PRDM that account for its changing system and the needs of the region.

NWECE was heartened by comments made by BPA PRDM staff at the August 1 workshop that any changes to the PRDM relative to the TRM—specifically in Chapter 4 regarding Tier 1 Rate Design—must be undertaken in a manner that upholds BPA's obligations to encourage conservation and efficiency and the development of renewable and other nonfederal resources while providing an adequate, efficient, economical, and reliable power supply. NWECE agrees with the statements of BPA staff, as these requirements are enshrined in Section 2(1)-(2) of the Pacific Northwest Electric Power Planning and Conservation Act of 1980 which fundamentally altered the scope of BPA's authority and obligations.

At a high level, NWECC supports the general direction of the PRDM insofar as it retains core incentives necessary to support the proliferation of conservation and nonfederal resources, which, aside from being legally mandated, are essential to meet the challenges BPA's system will face in the future with load growth and forecasted diminishing hydroelectric capacity. For example, NWECC supports the notion that a clearer price signal for capacity is needed to ensure that capacity resources are adequately valued moving forward. Retention of capacity and demand-based charges will help ensure BPA's system is dispatched efficiently and create an important incentive for conservation and nonfederal resources. NWECC supports the comments made by customer groups at the August 1 workshop that additional clarity is needed on how conservation will be valued and treated in the future.

NWECC again thanks BPA and all stakeholders for their hard work and for the opportunity to file these initial comments. NWECC looks forward to engaging in this and other processes to help ensure a bright future for BPA and the region as a whole.

Sincerely,

Mike Goetz  
Senior Policy and Regulatory Counsel  
NW Energy Coalition