

**COMMENTS OF THE WESTERN PUBLIC AGENCIES GROUP
RE: FY 2024 TRANSMISSION RDC**

Date Submitted: November 22, 2024

The utilities that comprise the Western Public Agencies Group (WPAG)¹ recommend that the Bonneville Power Administration (BPA) use the FY 2024 Transmission Reserves Distribution Clause (RDC) amount of \$82.8 million to reduce the extraordinarily high BP-26 transmission rate increase—consistent with how BPA applied a portion of the FY 2022 Transmission RDC to hold BP-24 transmission rates flat.² Absent such a determination, WPAG recommends that BPA postpone its decision on the disposition of the FY 2024 Transmission RDC so that the issue can be addressed by BPA and the parties in the BP-26 rate case proceeding. This is the third consecutive year that the Transmission RDC has triggered for more than \$60 million (FY 2022 = \$63.1 million, FY 2023 = \$130.4 million, FY 2024 = \$82.8 million). The sequential triggering of the Transmission RDC for such significant amounts indicates that BPA is systemically setting its transmission rates higher than necessary to recover its costs. This is an issue that would be best addressed in the BP-26 rate proceeding. Allowing the BP-26 rate case parties to concurrently litigate how to apply the FY 2024 Transmission RDC would better ensure that BPA's persistent overcollection of costs through its transmission rates can be addressed holistically in the rate proceeding.

¹ The utilities comprising WPAG include Benton Rural Electric Association, Eugene Water and Electric Board, Umatilla Electric Cooperative, the Cities of Port Angeles, Ellensburg and Milton, Washington, the Towns of Eatonville and Steilacoom, Washington, Elmhurst Mutual Power and Light Company, Lakeview Light & Power, Ohop Mutual Light Company, Parkland Light and Water Company, Peninsula Light Company, Central Lincoln People's Utility District, Public Utility Districts No. 1 of Clallam, Clark, Cowlitz, Grays Harbor, Jefferson, Kittitas, Lewis, Mason and Skamania Counties, Washington, Public Utility District No. 3 of Mason County, Washington and Public Utility District No. 2 of Pacific County, Washington.

² See [Administrator's Letter Re: FY 2022 Transmission RDC Final Decision \(Dec. 15, 2022\)](#) (applying \$16.4 million of the FY 2022 Transmission RDC to hold FY 2024-2025 transmission rates at the levels adopted in the BP-22 rate proceeding).