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10/24/2013

Mr. Stephen Oliver
U.S. Entity Coordinator

Bonneville Power Administration

United States Entity

P.O. Box 3621

Portland, OR 97208-3621

Mr. David Ponganis
U.S. Entity Coordinator

U.S. Army Corps of Engineers

United States Entity

P.O. Box 3621

Portland, OR 97208-3621

Dear Mr. Oliver and Mr. Ponganis:

Lincoln Electric Cooperative appreciates the opportunity to provide comments on the U.S. Entity's September 20, 2013 Draft Recommendation for the future of the Columbia River Treaty (Treaty). Lincoln Electric is a distribution cooperative that serves 4,100 members in northwest Montana and is a full requirements customer of the Bonneville Power Administration.

When involved in issues of this breath and magnitude it is often easy to forget just exactly who is impacted by the decisions that are made. We believe thus far the process has been flawed. It is unconscionable that rate payers have essentially been left out of the draft recommendation process until its framework had been set. The draft recommendations hierarchy of proposed actions shows a complete lack of sensitivity to those that pay the bills. In this case, elevating ecosystem restoration as a primary purpose of the treaty sets the stage for a spending spree that could outstrip any possible Canadian entitlement reduction.

Currently our 4,100 members pay, through rates, over \$2 million per year for ecosystem restoration and treaty benefits to Canada. In an area like ours with 14% unemployment and where the poverty rate is 32% any decrease in the entitlement needs to be returned back to those that have been paying it.

By the entities own calculations the Canadian entitlement is proven to be extremely unbalanced in favor of Canada. This should be the main focus of any new treaty negotiation. Rebalancing the benefits so that both countries receive fair and equitable benefits from this wonderful asset is and should remain paramount.

I know you are well aware of the tremendous effort being made by the ratepayers of the northwest to meet or exceed the requirements of the biological opinion process. It has been most effective and should be allowed to run its course. Any additional spending through the treaty for Eco-system restoration would most likely not have to meet the standards applied through our

current process using the best available science because if it did it would already be used in the program.

To reiterate we believe:

- That the process has been flawed by not allowing ratepayers a seat at the table.
- The Canadian entitlement is out of balance. Any savings made in rebalancing of those benefits should be returned the ratepayers.
- Ecosystem restoration is being addressed through domestic laws and requirements.
- There's not enough recognition of the roughly \$800,000,000 spent annually on the Biological Opinion process and the Fish Accords.
- Domestic law should not drive the treaty discussion.
- We support the current process for ecosystem restoration and any additional proposals must meet the best available science test through the biological opinion process.

Thank you for allowing us here at Lincoln Electric to comment on the draft recommendation to the Columbia River Treaty.

Respectfully,

Ray Ellis
General Manager
Lincoln Electric Cooperative