



October 25, 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:

Public Utility District No. 1 of Benton Country, Washington (Benton) appreciates this opportunity to provide comments in response to the U.S. Entity's September 20, 2013 draft recommendation (Draft Recommendation) for the future of the Columbia River Treaty (Treaty) with Canada. Benton has approximately 50,000 customers and depends primarily on the Columbia hydropower generating plants through its' contract with Bonneville Power Administration to meet its customer's electric energy needs.

Benton is a member of the Columbia River Treaty Power Group (Power Group) and fully supports their response, dated October 25, 2013, to the U.S. Entity's September 20, 2013 Draft Recommendation.

Benton appreciates the U.S. Entity's efforts, since issuing the June 27, 2013 working draft recommendation, to better understand the concerns and interests of Northwest electric customers related to its effort to develop and fund a regional recommendation for the U.S. Department of State (State Department). Along with the concerns expressed by the Power Group, Benton's principal concerns have not been adequately addressed in the Draft Recommendation: (1) prioritizing the Canadian Entitlement (Entitlement) as the most important issue to address in any renegotiated Treaty and (2) fully accounting for significant ongoing efforts in the Columbia River and its tributaries for fish and wildlife in any proposal to expand the Treaty to include ecosystem function.

Additionally, Benton believes that funding for additional ecosystem-based function operations should come from sources other than rebalancing of the power benefits between the two countries .

Benton urges the U.S. Entity to closely examine and fully address these issues when developing its final recommendation to the State Department. We encourage the U.S. Entity and the State Department to continue to work with the Columbia River Treaty Power Group. Benton remains ready to discuss these issues in greater depth, and to work towards reaching a truly regional final recommendation.

Please feel free to contact Dan Bickford at 509-582-1229 or email at [bickford@bentonpud.org](mailto:bickford@bentonpud.org) if you have any questions regarding the issues raised in this letter.

Sincerely,



Chad B. Bartram  
General Manager