



August 16, 2013

Stephen R. Oliver
Bonneville Power Administration

David Ponganis
U.S. Army Corps of Engineers

U.S. Entity
Columbia River Treaty
P.O. Box 3621
Portland, OR 97208-3621
emailto:treatyreview@bpa.gov

Re: Columbia River Treaty Draft Recommendation

Dear Mr. Oliver and Mr. Ponganis:

On behalf of the Washington Public Utility Districts Association (WPUDA) I appreciate the opportunity to provide comments on the Columbia River Treaty Draft Recommendation. The future of the Treaty is important to our members who provide electrical service to more than 600,000 residential, business and industrial customers across the State of Washington. Some of our members operate large hydroelectric projects on the Columbia River while others rely on power generated by the Federal based system to serve their communities. WPUDA has serious concerns about the Draft Recommendation in its current form and does not believe it should serve as the basis for a final recommendation to the Department of State. We strongly believe modifications must be made to adequately address key issues that the power and economic interests articulated in the review process.

As a member of the Columbia River Treaty Power Group, WPUDA supports the following principals outlined by the group:

- The Canadian Entitlement payment made to Canada for downstream power benefits should not exceed one-half of the power benefits achieved through a coordinated United States/Canada operation as compared to a non-coordinated operation.
- Flood control payments should be the responsibility of the federal government, not regional ratepayers.
- An equitable correction to the Canadian Entitlement should not lead to an increased ecosystem mitigation requirement. The draft recommendation fails to recognize the substantial investments in ecosystem functions this region has already made for decades outside the Treaty. Regional electric customers have invested billions in fish protection efforts, and each of the entities providing the Canadian Entitlement already have robust environmental mitigation plans embedded in their project authorizations. Along with the cost of the Entitlement return, this mitigation is funded by utilities and their customers.

In addition to the above principals, WPUDA concurs with the comments dated August 16, 2013 submitted by the Columbia River Treaty Power Group regarding the Draft Recommendation.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'George M. Caan'. The signature is written in a cursive, flowing style.

George Caan, Executive Director