



COLUMBIA RIVER TREATY POWER GROUP

October 25, 2013

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Dear Mr. Oliver and Mr. Ponganis:

The Columbia River Treaty Power Group (Power Group) 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.¹ The Power Group, formed in 2011, consists of over 80 electric utilities, industry associations and other entities that depend on power produced by the Columbia River hydropower generating plants. Together, we represent at least 6.4 million electric customers in the four Northwest states that are directly impacted by this Treaty.

The Power Group appreciates the U.S. Entity's renewed commitment since the initial June 27, 2013 working draft recommendation to better understand the concerns and interests of Northwest electric customers related to its efforts to develop a regional recommendation for the U.S. Department of State (State Department). The U.S. Entity's outreach efforts to utilities and their customers since the release of the working draft recommendation led to an improved Recommendation. However, the two primary concerns that Power Group members have raised consistently during the U.S. Entity's Treaty review process are not adequately addressed in the Draft Recommendation:

1. The U.S. Entity, in its attempt to craft a regional recommendation to the State Department, has failed to focus on and properly prioritize the fundamental need to reestablish an equitable distribution of power benefits between the U.S. and Canada. Unlike other resource priorities identified in the Draft Recommendation, this paramount issue—the amount of the Canadian Entitlement payment (together with determination of cross-border flood risk management cooperation post-2024)—can be resolved *only* between the U.S. and Canada.

¹ Individual members of the Power Group also may be submitting their own comments to the U.S. Entity on the Draft Recommendation.

2. To the extent the U.S. Entity recommends to the State Department that a renegotiated Treaty should formally adopt ecosystem functions as a “third primary purpose” of the Treaty, that recommendation must recognize and *fully account for* efforts already being undertaken under existing federal and state programs to protect fish and wildlife resources in the Columbia River and its tributaries. This means that any effort to expand the Treaty to include ecosystem function must not interfere with or adversely affect these ongoing programs, as they are publicly developed programs that have resulted in billions of dollars already invested by Northwest electric customers, and hundreds of millions of dollars in fish and wildlife measures each year. In addition, the Draft Recommendation should clearly assert that domestic ecosystem issues - such as fish passage at Grand Coulee and Chief Joseph dams - are outside the scope of any renegotiated Treaty.

For these reasons, the Power Group believes that more work needs to be done to reach a regional recommendation.

Rebalancing of the Canadian Entitlement Is the Paramount Issue to Address in Any Treaty Negotiations with Canada

The primary objective of engaging in any Treaty negotiations with Canada must be intensely focused on correcting the current inequity of the U.S. obligation under the Canadian Entitlement. Any regional consensus on a recommendation to the State Department hinges on this being the paramount issue in any Treaty negotiations. The Power Group believes that among the U.S. Entity, Sovereign Review Team, and other stakeholders there is consensus on the need to rebalance the Canadian Entitlement. Reducing the financial burden to Northwest electric customers, caused by a Canadian Entitlement vastly out of sync with current conditions, and returning the use of clean, renewable hydroelectricity to the Northwest, is clearly in the best interest of the United States.

Unfortunately, the Draft Recommendation seems to lose sight of this fundamental point by appearing to position ecosystem function as the leading issue to pursue in Treaty negotiations. From its opening paragraph in the introduction through the end of the document, ecosystem function is consistently and prominently listed before other Treaty purposes.² Most of the “General Principles” touch upon ecosystem function, with little discussion of other Treaty purposes.³ The specific recommendations for ecosystem function are far more numerous and expansive than any other proposed Treaty purpose.⁴ Even where the Draft Recommendation sets

² See, e.g., Draft Recommendation at 2 (“[T]he region’s goal is for the United States and Canada to develop a modernized framework for the Treaty that ensures a more resilient and healthy ecosystem-based function throughout the Columbia River Basin while maintaining an acceptable level of flood risk and assuring reliable and economic hydropower benefits.” (footnote omitted)); *id.* at 3 (“Treaty provisions should enable the greatest possible shared benefits in the United States and Canada from the coordinated operation of Treaty reservoirs for ecosystem, hydropower, and flood risk management, as well as water supply, recreation” (General Principle 1)).

³ *Id.* at 3-4.

⁴ *Id.* at 4-5.

forth proposals for other Treaty purposes, in some instances those recommendations appear to apply only to the extent they do not infringe upon the inclusion of ecosystem function proposals.⁵

The Power Group believes that the Draft Recommendation's approach elevates a resource issue that is inherently domestic in nature (and addressed thoroughly under well-established federal and state statutory programs⁶) at the expense of the cornerstone issue—the Canadian Entitlement—that can be addressed *only* through negotiations between the U.S. and Canada via the Treaty.

While the Canadian Entitlement is the financial lynchpin of the Treaty, the U.S. obligation under the Entitlement far exceeds the actual power benefit received. The U.S. Entity has estimated that the U.S.'s obligation under the Entitlement costs Northwest electric customers between \$250 and \$350 million in annual power benefits transferred by the U.S. to Canada,⁷ even though the U.S. Entity itself has estimated that one-half of the downstream power benefits received by the U.S. would be about one-tenth of the exported electricity (valued at \$25 to \$30 million annually).

This disparity is wholly unacceptable. At this stage of developing a regional recommendation to the State Department, the U.S. Entity—instead of exerting significant resources on domestic ecosystem issues—should be focused on analyzing the problems in the current methodology for calculating the Canadian Entitlement, identifying possible solutions for correcting these problems, and developing a recommendation for addressing these matters with Canada at the earliest possible time. By 2024, 60 years will have passed since the Treaty was ratified. The U.S. has a duty on behalf of its citizens, and Northwest electric customers in particular, to rebalance the Canadian Entitlement in a manner that ensures that the U.S. obligation under the Treaty is commensurate with the power benefits actually received.

Thus, any regional recommendation must prioritize rebalancing the Canadian Entitlement to reflect the actual power benefits of ongoing coordinated operation. This priority must appear on page 1 and throughout the U.S. Entity's final recommendation to the State Department.

⁵ See, e.g., *id.* at 6 (providing that storage and release allocations for water supply “should be made through a future domestic process and be consistent with water rights, including tribal reserved water rights and ecosystem-based function”); *id.* (“A modernized Treaty should consider impacts from climate change to all elements above, and create new terms in the post-2024 Treaty to allow the adaptive management of coordinated Treaty operations to better mitigate any impacts associated with climate change.”).

⁶ As the Power Group has previously explained:
Projects and activities are subject to the substantive and procedural requirements of numerous federal and state programs such as the National Environmental Policy Act, Clean Water Act, Clean Air Act, Endangered Species Act, Federal Power Act, Fish and Wildlife Coordination Act, Magnuson-Stevens Fishery Conservation and Management Act, Pacific Northwest Electric Power Planning and Conservation Act, Coastal Zone Management Act, Federal Land Policy and Management Act, National Forest Management Act, state water quality standards, state water rights, and numerous other requirements.

Letter to Stephen Oliver, Bonneville Power Administration, and David Ponganis, U.S. Army Corps of Engineers, from The Columbia River Treaty Power Group at 6 (Aug. 16, 2013) [hereinafter, Power Group Comment].

⁷ See Iteration #2 Alternatives & Components: General Summary of Results at 33 (Apr. 10, 2013).

Correcting the Canadian Entitlement also is consistent with the Administration's clean energy policy objectives. From that perspective, it is counterproductive to export between \$2 and \$3 billion in clean, renewable, domestically produced energy over the next decade. Moreover, if left unchanged, this situation will continue after 2024. By 2025, the current calculations for determining the Canadian Entitlement will require providing Canada approximately 450 MW average megawatts of energy and 1,300 MW of capacity each year. Correcting that inequity should be the highest priority of the State Department when pursuing any Treaty negotiations with Canada. Each year after 2024 in which the Canadian Entitlement remains unchanged is a significant loss of resources and value for the U.S.

Article VII of the Treaty defines downstream power benefits as the “difference in hydroelectric power capable of being generated in the U.S. with and without the use of Canadian storage.”⁸ Going forward post-2024, this is the wrong baseline. The appropriate level of value returning to Canada after the initial 60-year agreement must be based on the benefits of ongoing coordinated operations between the U.S. and Canada—not on a comparison of conditions pre-and-post dam construction. The Power Group supports a Canadian Entitlement that does not exceed one-half of the actual incremental power benefit achieved through a coordinated U.S./Canada operation as compared to non-coordinated operation.

As the 60th anniversary of the Treaty draws closer, the U.S. and Canada face an ideal opportunity to reevaluate the approach and methodologies utilized to determine downstream power benefits (and thus, the Canadian Entitlement). The current approach for determining downstream power benefits is based on the following question: What are the downstream power benefits resulting from the construction of the Canadian storage projects compared to the operation of a U.S. power system, as it stood prior to 1965, without the upstream Canadian storage dams? This question, however, is outdated and irrelevant when determining the Canadian Entitlement methodology that should apply on a going-forward basis. As the Canadian storage is now in place, and will continue to operate into the future, the fundamental approach to Canadian Entitlement determination should be redirected towards clearly determining the downstream power benefits resulting from a post-2024 Treaty assured operation (as opposed to the uncoordinated operation of each country's hydropower system). Moreover, the important experience gained and the lessons learned over the last five decades related to shortcomings and problems with the methodologies currently employed in the Canadian Entitlement determination should be strongly considered and used to ensure a more equitable, flexible, and robust downstream power benefit determination process exists going forward.

History has shown that no matter how sincere the effort to appropriately calculate the Canadian Entitlement might have been, a static formula based upon extrapolations of then-current conditions into the future was not an optimal approach to ensuring fair and equitable outcomes. The original methodology was not developed to capture the actual realized downstream power benefits created by the Treaty provisions so much as it was a compromise method that—based upon then-current expectations about the future—might have been expected to result in a fair “price” for each country relative to the benefits each was expected to receive. During original Treaty negotiations, there clearly was an expectation by both countries that the Canadian Entitlement would end well before 2024. The current methodology was a choice, based upon

⁸ Article VII(1).

expert judgment in the early 1960s, that it would be a reasonable approximation to the actual power benefits created by Canadian storage based upon certain expectations as to how the future would unfold. However, the future unfolded much differently than expected.

Factors such as significantly lower than expected regional electric load growth, greatly expanded opportunities to market non-firm hydropower outside the region, a much wider slate of power supply resource types available for consideration than existed at the time of Treaty signing, and changing societal preferences regarding environmental and cultural issues have greatly affected the reasonableness of the current methods as an approximation of the actual downstream power benefits resulting from the original Treaty provisions, and thus the accuracy of the calculated Canadian Entitlement. The result was the severe imbalance in benefits received relative to costs paid by U.S. power consumers.

For these reasons, the Power Group believes that the U.S. Entity's final recommendation to the State Department must clearly call out these methodological deficiencies and delineate a path to rectify them. The primary objective for the State Department in any Treaty negotiation should be to ensure that after 2024, the U.S. should pay Canada only one-half of the actual downstream power benefits of ongoing coordinated operations.

Ecosystem Function Remains Unclear

The Power Group appreciates the U.S. Entity's acknowledgement in the Draft Recommendation that any expansion of the Treaty to include ecosystem function must "formalize, provide certainty, and build on the many ecosystem actions already undertaken through annual or seasonal mutual agreements between the countries."⁹ The Power Group is concerned, however, that the ecosystem function recommendation is vague and offers little certainty and structure. Without additional details, adding a sweeping and broad third primary purpose of the Treaty would lead to conflicting obligations and priorities. Further, the Draft Recommendation provides no explanation as to how an expanded Treaty would fit in with the numerous environmental programs currently in place within the Federal Columbia River Power System (FCRPS) and at the generating projects of Power Group members. These uncertainties could diminish, or threaten altogether, ecological benefits achieved after years of detailed studies, tireless investigations and negotiations, and at times, litigation. The uncertainties associated with ecosystem function, as presented in the Draft Recommendation, create significant risk to environmental resources and electric customers in the Northwest.

Members of the Power Group are proud of their environmental stewardship and the progress that their significant efforts have made in protecting and managing fish and wildlife resources. This is why, in our prior comment letter, we urged the U.S. Entity to "account for the significant ecosystem stewardship actions taken to date."¹⁰ By asking for this recognition, Power Group members were not merely seeking acknowledgement of our successful environmental programs, though it is important for stakeholders to have a robust understanding of the investments already undertaken. Rather, we are expressing concern that proposals to inject ecosystem functions at

⁹ Draft Recommendation at 3.

¹⁰ Power Group Comment at 7.

the Treaty level could have unintended consequences for existing, publicly developed programs in the U.S. that represent significant investments for electric customers. Treaty-mandated changes in flow regimes, fish passage operations, or similar requirements could conflict or interfere with ongoing programs in the Columbia River Basin and harm the very resources Treaty-imposed ecosystem functions seek to protect.

While the Draft Recommendation *acknowledges* the “[s]ignificant efforts to address ecosystem concerns” and that “the region, principally through its electric utility ratepayers, has invested hundreds of millions of dollars annually to achieve ecosystem improvements throughout the Basin,”¹¹ the Draft Recommendation does not actually *account* for these ongoing programs. Instead, the Draft Recommendation only expresses a desire to “expand, enhance, and complement these existing ecosystem investments as part of the post-2024 Treaty”¹²—without any accompanying analysis as to how this is to be achieved.

Thus, any final recommendation to the State Department related to ecosystem function should carefully *account* for all ongoing efforts in the Basin, to ensure that the recommendation does not inadvertently conflict with, undermine, or disrupt these efforts—particularly those that were developed in close consultation and negotiations with the public, many members of the Sovereign Review Team, other federal and state resource agencies and Tribes, and environmental advocacy groups. Such ongoing programs include, for example:

- The FCRPS Biological Opinion;
- Requirements of Federal Energy Regulatory Commission licenses, Habitat Conservation Plans, and other permitted activities of Power Group Members; and
- The Columbia Basin Fish Accords.

An important role for the U.S. Entity, as the technical expert on river operations, is to provide sideboards for this Treaty discussion by describing the operational constraints of the existing Columbia River system and its tributaries, their complexity, and the current constraints relating to flood control and flow augmentation. In addition, in order for this region to have a fuller understanding of the cost and benefit of ecosystem proposals, the U.S. Entity should provide insight into the costs, and the funding sources, for contemplated ecosystem proposals.

In this regard, the Power Group appreciates the U.S. Entity’s recognition of the importance of the hydropower system to electric customers in General Principle 8 of the Draft Recommendation.¹³ We strongly support the statement that any modification to the Treaty should not prevent the region from achieving its objective of reducing U.S. power costs. In fact, General Principle 8 should specifically state: “The U.S. should rebalance the Canadian Entitlement and thereby reduce power costs. Any other modifications should not undermine that overall effect.” Even more important is the ability to use the clean, renewable hydroelectricity in the United States to

¹¹ Draft Recommendation at 1.

¹² *Id.* at 2.

¹³ *Id.* at 4.

meet customer needs, and assist with integrating other renewable resources, rather than sending an over-allocation of energy and capacity to Canada. Our electric customers and the Northwest economy are sensitive to energy prices, and residential electric customers and businesses have seen substantial rate increases over the past several years. The Northwest economy relies on the multiple uses of the Columbia River to support the vibrant mix of technology, trade and agriculture that contributes to this region's quality of life.

With regard to the second sentence in General Principle 8, however, the use of the word “funding” seems inappropriate if it is suggesting that savings from a rebalanced Canadian Entitlement could be used to purchase ecosystem measures. The currency of the Canadian Entitlement is megawatts of hydropower energy and hydropower capacity. The Bonneville Power Administration may lack statutory authority to “spend” the value of any rebalanced Canadian Entitlement payments on new ecosystem issues. The Power Group recommends that the sentence be restructured to ensure the reference to “funding” applies only to “other sources,” such as federal appropriations.

Comments on Specific Ecosystem Function Issues

The Power Group offers the following comments in response to several specific ecosystem functions discussed in the Draft Recommendation:

- *Cross-Border Flows:* The Power Group believes that cross-border flows with Canada may be an appropriate topic for international discussions—specifically, the quantity and timing of flows across the border. Such discussions, however, would need to include sideboards. Changes in flows for ecosystem-based functions, for example, would need to be based on documented, scientifically proven analysis. Moreover, the effects of changes in flow on ongoing ecosystem projects and programs must be fully understood in order to prevent unintended negative impacts. The Power Group remains concerned that a shift in flows from winter to spring will reduce the amount of useable hydroelectric energy and capacity, potentially impact grid reliability, inhibit the system’s ability to integrate renewable generation and accelerate the need for fossil-fuel capacity, and contribute to high levels of total dissolved gas in the river during the spring migration period.

It is also important for the U.S. Entity to differentiate between cross-border flows and any other proposed flow augmentation that would rely solely on changes to U.S. project operations. Any discussion of flow augmentation that is not directly tied to cross-border flow discussions must be considered a domestic issue, and addressed in an appropriate domestic forum.

- *Non-Treaty Storage Agreements and Ecosystem Actions:* There may be advantages to both countries to bringing existing, non-Treaty actions (such as the non-Treaty storage agreements) into the Treaty discussions, with a goal of better integrating both Treaty and Non-Treaty storage agreements that govern river operations. The Power Group notes, however, that bringing ecosystem issues into the Treaty may trigger a more formal review and approval process.

- *Fish Passage at Grand Coulee and Chief Joseph Dams:* The construction and operation of fish passage facilities in the U.S. is a domestic issue, and should be addressed, if warranted, through current domestic laws and regulations. On this point, the Province of British Columbia's recent *Draft BC Recommendation* states the following Principle: "Salmon migration into the Columbia River in Canada was eliminated by the Grand Coulee Dam in 1938 (26 years prior to Treaty ratification), and as such is not a Treaty issue. British Columbia's perspective is that restoration of fish passage and habitat, if feasible, should be the responsibility of each country regarding their respective infrastructure."¹⁴

In addition, because the study of fish passage into Canada would be subject to Congressional appropriations and authorizations, the Power Group believes it is inappropriate even to include a reconnaissance study in the Draft Recommendation. The Power Group has reservations about being able to satisfy our goal of reducing U.S. power system costs to our customers if fish passage at Grand Coulee and Chief Joseph is included in the recommendations.

Other Changes to the Draft Recommendation Are Warranted

In addition to the Canadian Entitlement and ecosystem function issues described above, the Power Group believes the following changes should be incorporated into the final recommendation to the State Department:

- *Flood Risk Management:* Public safety should continue to be a high priority, and for this reason the Power Group believes that a modernized framework for the Treaty should maintain flood risk management similar to current levels. In addition, funding for flood risk management should be consistent with national flood risk policy of federal funding with applicable local beneficiaries sharing those costs as appropriate.
- *Delivery of the Canadian Entitlement:* The Power Group is also concerned about transmission issues associated with the return of the Canadian Entitlement, an issue that also must be addressed in any renegotiated Treaty. As a result of the U.S. Entity's decision not to build the Oliver-Chief Joseph transmission line, the Canadian Entitlement energy has been returned to Canada via transmission lines running through the heavily-populated Puget Sound area. In recent decades, this has created transmission congestion events and threatened service reliability. The Power Group agrees with the Draft Recommendation¹⁵ that the U.S. should seek a least-cost transmission strategy with Canada for any power returned to Canada after 2024, including reconsidering the flexibility of the return.
- *Climate Change:* Climate change is a recurring theme throughout the Draft Recommendation, which calls for "new terms in the post-2024 Treaty to allow the adaptive management of coordinated Treaty operations to better mitigate any impacts

¹⁴ British Columbia, *Columbia River Treaty Review Draft BC Recommendation*, Principle 11.

¹⁵ Draft Recommendation at 5.

associated with climate change.”¹⁶ The Power Group recommends that any climate change “adaptive management” or “mitigation” activities respond to a demonstrable adverse effect upon ecosystem resources or hydropower production attributable to climate conditions, such as a long-term change in flow patterns from baseline conditions, that can be supported with the best available scientific information.

- *Irrigation and Water Supply:* Any changes in flow regime under a renegotiated Treaty should not adversely affect existing water rights established pursuant to federal or state law. Any future decisions under the Treaty related to water supply must include those holding existing water rights.
- *Navigation:* In addition to hydropower operations, navigation also would be affected by increased spring flows and lower fall and winter flows. These changes could affect operational restrictions and dredging required in the lower Columbia River due to increased sediment distributions. To ensure that navigation concerns are fully analyzed and considered, more detailed study of the proposed shift in flow timing would be necessary.
- *Domestic Matters to be Addressed Post-2013:* The Power Group should be represented in any Domestic Advisory Forum created by the State Department. Our electric customers are responsible for paying the value of the Canadian Entitlement to Canada, and they will be directly impacted each year by a compounding lost opportunity if the Canadian Entitlement is not rebalanced.
- *Additional Areas of Discussion for U.S. and Canada:* The working draft recommendation issued June 27, 2013 stated: “If unable to achieve agreement in principle on key aspects by summer 2014, we recommend evaluating other options to create a modernized post-2024 Treaty, such as starting from a clean slate.”¹⁷ This statement is excluded from the current Draft Recommendation. The Power Group strongly believes this language should be reinserted in the final recommendation to the State Department. The Treaty expressly recognizes the possibility of termination following the initial 60-year term, and the Power Group believes that the State Department should evaluate all available options to protect the interests of the U.S. when engaging with Canada on these important matters.

Conclusion

The Draft Recommendation attempts to address several of the issues raised by the Power Group in our prior written comments and in meetings with the U.S. Entity. We appreciate the work that has gone into these revisions. However, the Draft Recommendation still needs to place the Canadian Entitlement “front-and-center” as the primary international issue that can only be addressed through the Treaty. Further, we believe the Draft Recommendation remains

¹⁶ Draft Recommendation at 6.

¹⁷ Working Draft Recommendation at 6.

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inappropriately vague in terms of proposed ecosystem function, inviting uncertainty about the effects on hydropower operations and existing environmental programs.

The Power Group believes that a regional consensus that seeks to rebalance the Canadian Entitlement and provides real return in value to the U.S. electric system is in the best interest of all citizens of the U.S., and particularly Northwest electric customers. At this time, the Power Group supports concluding the Sovereign Review Team process. We remain ready to discuss these issues in further detail and to make a good-faith effort to reach a truly regional recommendation. Please do not hesitate to contact us at info@crtpowergroup.org with questions or comments about this letter.

Sincerely,

Columbia River Treaty Power Group

- Alcoa Inc.
- Avista
- Benton County PUD
- Benton Rural Electric Association
- Blachly-Lane Electric Cooperative
- Canby Utility Board
- Central Electric Cooperative, Inc.
- Central Lincoln PUD
- Chelan County PUD
- City of Bonners Ferry
- City of Cheney Light Department
- Clark Public Utilities
- Clatskanie People's Utility
- Clearwater Power Company
- Columbia River PUD
- Columbia Rural Electric
- Consumers Power Inc.
- Coos-Curry Electric Cooperative
- Cowlitz County PUD
- Douglas County PUD
- Douglas Electric Cooperative
- Emerald PUD
- Eugene Water and Electric Board
- Fall River Rural Electric Cooperative
- Ferry County PUD
- Flathead Electric Cooperative
- Franklin County PUD
- Glacier Electric Cooperative

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- Grand Coulee Project Hydroelectric Authority
- Grant County PUD
- Grays Harbor PUD
- Harney Electric Cooperative
- Idaho Consumer-Owned Utilities Association
- Idaho County Light & Power Cooperative
- Idaho Falls Power
- Inland Power and Light Company
- Kootenai Electric Cooperative
- Lane Electric Cooperative
- Lewis County PUD
- Lincoln Electric Cooperative
- Lost River Electric Cooperative
- Lower Valley Energy
- Mason County PUD #1
- Mason County PUD #3
- McMinnville Water and Light
- Midstate Electric Cooperative
- Missoula Electric Cooperative
- Monmouth Power & Light
- Nevada Rural Electric Association
- Northern Lights, Inc.
- Northern Wasco County PUD
- Northwest Requirements Utilities
- Okanogan County Electric Cooperative
- Okanogan County PUD
- Orcas Power & Light Cooperative
- Oregon Municipal Electric Utilities Association
- Oregon Rural Electric Cooperative Association
- Pacific County PUD #2
- PacifiCorp
- Pacific Northwest Utilities Conference Committee
- Pacific Northwest Waterways Association
- Pend Oreille County PUD #1
- Peninsula Light Company
- PNGC Power
- Portland General Electric
- Public Generating Pool
- Public Power Council
- Puget Sound Energy
- Raft River Rural Electric Cooperative

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- Ravalli County Electric Cooperative
- Richland Energy Services
- Salmon River Electric
- Seattle City Light
- Snohomish County PUD
- Springfield Utility Board
- Tacoma Power
- Tillamook PUD
- Umatilla Electric Cooperative
- United Electric Co-op, Inc.
- Vigilante Electric Cooperative
- Washington Public Utility Districts Association
- Washington Rural Electric Cooperative Association
- Wells Rural Electric
- Western Montana Electric Generating & Transmission Cooperative
- West Oregon Electric Cooperative, Inc.

cc: Elliot Mainzer, Bonneville Power Administration
Brigadier General John Kem, U.S. Army Corps of Engineers, Northwestern Division
Daniel Poneman, U.S. Department of Energy
Sue Saarnio, U.S. Department of State
Northwest congressional delegation
Governor Butch Otter, State of Idaho
Governor Steve Bullock, State of Montana
Governor John Kitzhaber, State of Oregon
Governor Jay Inslee, State of Washington