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VIA EMAIL: treatyreview@bpa.gov

Stephen R. Oliver
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Bonneville Power Administration

David Ponganis
U.S. Entity Coordinator, Columbia River Treaty
U.S Army Corps of Engineers, Northwestern Division

RE: U.S. Entity's Draft Recommendation (Draft Recommendation)

The Public Generating Pool (PGP) is composed of eleven consumer-owned electric utilities that serve approximately one million customers throughout Oregon and Washington. As Bonneville Power Administration (BPA) customers and Mid-Columbia project owners, PGP member utilities collectively pay for 62% of the Canadian Entitlement. The Columbia River Treaty (Treaty) has a significant impact on our customers.

The U.S. Entity's outreach efforts to utilities and their customers since the release of the working draft recommendation led to an improved Draft Recommendation. While we appreciate the subsequent outreach, the PGP still has concerns on the following key issues that have not been adequately addressed in the Draft Recommendation.

Prioritize a Rebalancing of the Power Benefits

Rebalancing the power benefits between the two countries should be reflected as the primary objective in any Treaty negotiations with Canada. We appreciate the Draft Recommendation's statements about rebalancing power benefits and, in particular, that "...the United States should only provide benefits to Canada equivalent to one-half of the actual United States downstream power benefits received from coordinated operations as compared to a non-coordinated operation." The Draft Recommendation loses sight of the fundamental issue of rebalancing power benefits by appearing to position the ecosystem function as the leading issue in Treaty negotiations.

- ***We ask the U.S. Entity to clearly prioritize rebalancing the power benefits under the Canadian Entitlement as the most important issue to address in the Final Recommendation. In view of its importance, the Hydropower section should be moved to the beginning of the Recommendation Details portion of the Final Recommendation.***

Support for Flood Risk Management

Maintaining effective flood control is an important safety and economic issue for the region. We appreciate statements related to Flood Risk Management in the Draft Recommendation. Any payments made to Canada for Columbia River flood control should be the responsibility of the taxpayers of the United States not

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the customers of Northwest utilities. This issue is also a high priority for the international negotiation and the order of the Recommendation Details should be modified accordingly to reflect this priority.

- ***We ask the U.S. Entity to clearly recognize the Flood Risk Management section as a continued economic and public safety priority. The Flood Risk Management Section should follow the re-ordered Hydropower section in the Recommendation Details of the Final Recommendation.***

Ecosystem-Based Function Must be Scientifically Credible

We continue to be concerned with the suggestion of specific operations in the Ecosystem-based Function portion of the Draft Recommendation. BPA and Northwest utilities have had significant experience with regional processes designed to evaluate and recommend potential ecosystem measures. That experience has demonstrated that all measures have trade-offs; not only between ecosystem and other purposes but most often between benefits and impacts to different species within the ecosystem. For this reason, the Northwest has developed highly public processes of scientific evaluation to support this complex decision making. Any exploration of ecosystem based function that is relevant under an international treaty must follow rigorous scientific evaluation and decision making. Given the regional process and scientific rigor that has been used to support the current ecosystem activities on the Columbia River, it is essential that any changes or modification to river operations be fully supported by a regional review of scientific evidence of benefit and impacts to all species in the ecosystem.

- ***We ask the U.S. Entity to assure that any Ecosystem-based Function be subject to the same standard of regional scientific review and decision making as current Columbia River operations before being placed in the Final Recommendation.***

Thank you for the opportunity to comment on the Draft Recommendation. We encourage the U.S. Entity to narrow the focus of any Final Recommendation to those issues that legitimately and appropriately fall under the scope of international negotiation and to this Treaty.

Sincerely,



Therese Hampton
Executive Director, Public Generating Pool

Cc:

Elliot Mainzer, Acting Administrator, Bonneville Power Administration
Columbia River Treaty Power Group

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