



Idaho County Light & Power Cooperative Association, Inc.

August 14, 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

Dear Mr. Oliver and Mr. Pongains:

The Board and management of Idaho County Light & Power Cooperative, on behalf of its members, want to take this opportunity to state our vital interest in the Columbia River Treaty and our grave concern regarding June 27th working draft of a regional recommendation to the Department of State on the future of the Columbia River Treaty with Canada.

Idaho County Light & Power Cooperative (ICLP) is a consumer owned rural electric utility serving approximately 3,700 members in the central panhandle of Idaho. Our cooperative has been a full requirements customer of the Bonneville Power Administration since 1942. Because ICLP is nestled among three river systems all feeding into the Columbia, our member/consumers have relied not only on the power generated by the Columbia River, but are integrally tied to the Columbia and its vast resources economically, historically and even spiritually.

Our primary concern with the June 27th working draft of a regional recommendation is that it does not give priority to balancing the equitable distribution of the Columbia's power benefits. This, after all, was the reason the Treaty was brought into existence. Since the signing of the Treaty, all BPA consumers including our members have become increasingly disadvantaged in the sharing of benefits under the Treaty. In addition, over the years they have also paid increasing amounts of their rates into fish and wildlife mitigation and enhancements. This brings attention to another problem with the draft

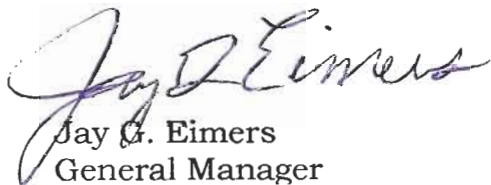
recommendation. While ecological concerns are clearly a major focus of the Sovereign Review Team, there is virtually no recognition of the accomplishments and gains made by this region with the \$13 billion from rate-payers pockets. It is painfully clear to us, that if the draft recommendation were the basis for the Department of State's negotiation strategy, our members would only become even more disadvantaged.

It is our opinion that draft recommendation is not representative of this region and should not be forwarded to the Department of State as such. The drafting of the recommendation completely excludes the group that has been paying the bill and is most impacted by the Columbia River System. We would hope that the consideration of this group would be included in the review and drafting of any final recommendation.

We therefore support the principals for the treaty outlined by the Columbia River Power Group. First, 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. Second, any payments for Columbia River flood control should be the responsibility of the taxpayers of the United States. This is consistent with the flood control funding approach employed throughout the United States. Third, an equitable correction to the Canadian Entitlement should not lead to an increased ecosystem mitigation requirement. The draft recommendation fails to recognize the substantial and successful investments in ecosystem functions this region has already made for decades outside the Treaty.

Thank you for this opportunity and for considering our views. We look forward to a final recommendation for the State Department that represents all of our region's interest in the Columbia River Treaty.

Sincerely,



Jay G. Eimers
General Manager

CC:

Jim Yost, State of Idaho Representative NWPC
Sen. Mike Crapo, c/o Tony Snodderly
Sen. James Risch, c/o Mike Hanna
Rep. Raul Labrador, c/o Scott Carlton
Elliot Mainzer, BPA
Colonel John Kem, USACE, NW Division