



SERVICE CENTERS:
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HARNEY ELECTRIC COOPERATIVE, INC.

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August 15, 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. Ponganis

The Columbia River Treaty (CRT) and the review process are of significant interest to Harney Electric Cooperative. Our Cooperative purchases all of our energy through the Federal Columbia River Power System.

Harney Electric Cooperative serves the High Desert of Southeastern Oregon and Northern Nevada, a 20,000 square mile area that has a density of one member per 16 square miles. Ranching and Agriculture are the two predominate ways of making a living.

I am extremely disappointed in the June 27th working draft recommendation concerning the future of the Columbia River Treaty with Canada. The working draft does not put the United States in a strong position to advocate for our regional and national interests with Canada. It does not come close to representing the regional consensus on this issue with the U.S. Entity. The draft needs to be rewritten before being sent as the basis for a final recommendation to the Department of State.

So how would I like to see this changed?

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 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.

The inclusion of "ecosystem" as an issue in the treaty negotiations provides inequitable additional opportunities that are already in place including those under the FCRPS Biological Opinion.

Thank you for considering my 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,

Harney Electric Cooperative



Randall T Whitaker
General Manager

cc: Oregon Congressional Delegation
John Kitzhaber, Governor of Oregon
Elliot Mainzer, Bonneville Power Administration