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Via Electronic Submission
Bonneville Power Administration
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Inland Power comments in support of the joint NRU, PNGC and WPAG proposal concerning the Utility Delivery Charge (UDC) for FY2014/2015 and beyond

Inland Power and Light Company (Inland) as a full requirements customer of BPA has participated in the UDC discussion during the current rate case. While Inland is no longer subject to the UDC having purchased all of the BPA owned substations serving our loads over ten years ago we are still subject to similar service at the points of delivery (POD's) owned by Avista Utilities.

Inland continues to support BPA's initiative to get out of the low voltage delivery business. The joint proposal brings certainty to ending this service from BPA while allowing sufficient time for the remaining 47 facilities to be sold or facility specific charges to be developed and directly assigned to the utility(s) being served. We understand the unique nature (age, multiple utilities, etc) of some of the facilities and the complexities in transferring ownership which result. We believe it is possible to sell at least some of the remaining facilities if BPA and the individual utilities are given time to work through the issues and find innovative solutions while recognizing the work involved and that an end to the existing service may be necessary to speed negotiations and compromise. Increasing the rate for this service commensurate with the average transmission rate increase further incentivizes this work while providing some financial stability until a sale is completed.

Inland recognizes that the similarities between GTA and directly connected low voltage delivery service are diminishing and that adoption of two separate pools each with its own cost basis may be necessary. Eventually directly assigning these costs to individual utilities may be the fairest solution for both groups. We appreciate the support BPA has shown in working with individual utilities to find solutions which support BPA's goal of getting out of the low voltage delivery business and meet our goal of providing low cost reliable energy to our members.