DSI-076
MAR 14 2005

SPRINGFIELD UTILITY BOARD

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March 11, 2005

Paul Norman
Senior Vice President
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208-3621

Re: BPA Regional Dialog (Supplemental DSI Comments) – PT-5

Dear Paul:

Springfield Utility Board ("SUB") received your letter dated February 4, 2004 which discussed an additional comment period for DSI service associated with BPA's Regional Dialog process. This letter is in response to your invitation for comment. SUB is a municipal utility that serves approximately 30,000 electric customers within the City of Springfield, Oregon. The comments below are intended to supplement SUB's comments dated September 22, 2004 and November 12, 2004.

Procedural Concerns

- SUB has repeatedly requested information on the implications of BPA processes and the ability to comment on issues in upcoming the rate case(s). SUB has made it clear that SUB is concerned that our ability to raise issues may be pre-empted by decisions outside a rate case.

- BPA has yet to provide critical clarification on the implications of segmenting its various processes (e.g. Power Function Review, DSI service) with regard to rate case parties' ability to raise issues in the upcoming 7(i) rate case process.

- SUB has discouraged "BPA from 'picking and choosing' what policies to isolate from the broader discussion"[1]. There is increased uncertainty that this type of piecemeal decision-making may be creating financial obligations that do not otherwise legally exist[2]. It also raises concerns about the potential limit of the BPA Adminstrator's exercise of this type of power. To what extent would or could the Adminstrator attempt to prescribe benefits and cost commitments outside a rate case process?

- Dialog is not encouraged within these segmented processes if BPA sets the agenda, isolates some issues, and excludes other interrelated issues.

- Customers have reason to be concerned with treatment of the DSIs given BPA's track record of behind-the-scenes negotiations with DSIs (a case in point being the signing of a Compromise Approach agreement that prescribed service levels to DSIs prior to the WP-02 Rate Case[3]). SUB appreciates a dialog on the DSI issue, but treating the DSI issue through a Record of Decision process merely creates a pre-emptive decision process prior to a rate case.

- By deciding issues in fragments, BPA is losing sight of the bigger picture and is painting preference customers into a corner with regards to the ability to deliberate on all issues comprehensively. The level of DSI service from BPA should be part of the upcoming rate case (or rate case settlement) and not decided outside of a rate case process.

- BPA has stated that "Final decisions regarding specific contract language and, if necessary, the qualifying DSIs will be made in the fall of 2005, <u>subject to any decisions BPA must make in a rate case process</u>."[4]

- Should BPA desire to isolate any issue from a rate case discussion, it should make such a determination absolutely clear so that interested parties have a better understanding of the legal implications of BPA's decision-making processes. BPA has not done so in this case. **<u>Given the public notice on DSI issues specifically made reference to issues being subject to a rate case process, SUB would object to any attempt by BPA to make a final determination on DSI service from 2006-2011. BPA should make it clear that all issues regarding DSI service are allowed to be raised in upcoming rate cases.</u>**

- Should BPA want to isolate the level of DSI service (or any aspect thereof) from future rate cases, it should re-issue a public notice clearly stating that intent and allow a reasonable time period for additional public comment on this issue.

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[1] SUB's Regional Dialog Comments, November 12, 2004 - page 2

[2] BPA has stated that it has no legal obligation to provide service to DSIs. BPA has cited a desire to resolve the issue of DSI service due to political concerns, but given that BPA appears to be attempting to resolve this issue prior to a rate case SUB does not find BPA's argument compelling. A valid issue would be resolved in a rate case.

[3] *See* WP-02-A-02, page 15-37 (2002 Final Power Rate Proposal ROD, part 3 of 3) for additional history on the Compromise Approach.

[4] February 4, 2005 letter from BPA, page 1 (emphasis added).

Having spoken with Michelle Manary of BPA, SUB is encouraged to find that BPA is planning to release information that specifically identifies when (and through what process) an issue will be decided. Unfortunately, that information will not be publicly available prior to the deadline for comments on DSI service. While SUB is pleased with BPA's efforts, SUB cannot wait for comment deadlines to pass while at the same time waiting for BPA to release information to all interested parties that was reasonably to be expected months ago[5].

Overview

In BPA's February 4 letter, BPA states:

> "BPA intends to provide DSI benefits because of the industries' important historic role as a source of family wage jobs that are very important to many communities in the region. However, we are also mindful of the costs of this decision to other BPA customers. Finding the balance between supporting DSI jobs and minimizing rate impacts is an important and worthwhile regional initiative."

At face value, BPA's comments give short shrift to other industries in the northwest – placing job preservation of DSIs on a pedestal above all other industries. Since BPA raises the historical context, it is important to raise a few historic issues not previously raised:

1) Historically, DSIs contributed to placing regional energy demands on BPA that were in excess of the output of the existing Federal Columbia River Power System (FCRPS). Because of the demand for power (in significant part related to DSI service), in the 1970's BPA sought other power sources and ultimately agreed to acquire output from nuclear generating facilities through the Washington Public Power Supply System (WPPSS, now Energy Northwest). BPA's costs associated with this power acquisition are being borne by preference customers. Arguably, if the DSIs were not served by BPA, BPA could have avoided purchasing the high costs associated with nuclear power that are currently passed on to preference customers. BPA's payments associated with Energy Northwest debt service are in excess of $400 million per year.

2) An even more defensible argument would be the avoided cost of high cost resource acquisition after the WPPSS commitment. Without having to serve DSI loads, BPA would have avoided participation and subsequent withdrawal from Tenaska and other resources. Tenaska ended up being the resource that never was and cost BPA and preference customers $315 million dollars[6].

3) In the WP-02 Rate Case BPA's own figures showed that DSI service exposed preference customers to between $660 million to $1.4 billion per year in cost exposure[7]. BPA cited "A very high cost to regional ratepayers for each aluminum industry job created. For every dollar in aluminum industry wages paid, regional ratepayers would pay roughly $10 in BPA

[5] Recent examples where SUB made requests include the February 1 PFR technical workshop and the recent letter sent from the Public Power Council that SUB endorsed.
[6] NW Energy Coalition Report, September 1998, Vol. 17 #9, page 5
[7] Translating to $95,000 to $563,000 per DSI job at the time *See* WP-02-E-SP-02, page 4

rate increases to cover the cost of power purchased by DSIs…In the fall of 2001, service to aluminum smelters would have cost the region 4 jobs for every job created in the aluminum industry"[8].

4) As a consequence of signing contracts with DSIs for service after 2000, BPA bought down DSI obligations to avoid a 250% rate increase. These buy-down costs have been borne by preference customers[9]. Preference customers are still paying for the consequences of DSI service even today.

5) In some cases, DSIs that have received power have not reimbursed BPA for the power purchases. These DSIs have declared bankruptcy and avoided payment to BPA – resulting in these costs being pushed onto preference customers.

6) BPA has stated that service to the DSIs is not a national security issue[10].

7) "On balance, aluminum uses a lot of electric power for relatively few jobs."[11]

The bottom line is that preference customers have already over-contributed toward BPA providing service to DSIs. Between 1980 and 2000, DSIs had a temporary service period of twenty years to develop other alternative power supplies by taking the savings from BPA service and putting those savings toward alternate power supplies. Instead DSI management elected to have those savings contribute toward their profit margin and much of the twenty-year regional investment in DSIs evaporated into shareholder dividends. That was their choice and preference customers have been burdened with the consequences of those choices. In 1999 and 2000, BPA unilaterally elected to extend "temporary" service to DSIs for another 5 years with dire results to preference customers. Today, BPA again seeks to turn to preference customers to support DSI bottom lines.

It isn't about jobs. If that were true then BPA would have insulated the region from the consequences of corporate decision making to protect those jobs if jobs were the issue. The City of Springfield suffered devastating economic losses when the timber industry suffered a downturn in the late 1980's. Where was BPA then with extra "job money" for Springfield's timber industry? Idolizing one industry for job benefits is unfair to the hardworking individuals in other industries.

"…preference customers have done more than their share contributing toward the survival of an industry that has, for the most part, taken the money and ran…The question is "When will it end?"

Despite the history, SUB wishes DSIs the best, but preference customers have done more than their share toward contributing toward the survival of an industry that has, for the most part, taken the money and ran. The continuing economic hardship placed on preference customers due to DSI service must end. The question is, "When will it end?"

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[8] BPA Fact Sheet, April 19, 2001, page 2 (provided as an attachment to this document)
[9] Id., page 1
[10] Id., page 3
[11] Columbia River Power For The People – A History of Policies of the Bonneville Power Administration, DOE-BP-7, 1981. page 272

Given the history of service to DSIs and related consequences, SUB certainly understands the perspective of those who advocate that BPA provide no benefits to DSIs.

However, BPA requested a dialog in the Regional Dialog process. Out of respect of BPA's request and with the above comments in mind, SUB is taking this opportunity to provide input on issues raised in BPA's letter.

Principles

BPA has requested consideration of five principles. SUB will address each in turn and propose additional principles for BPA's consideration. SUB recommends that BPA not provide a power sale to DSIs as the mechanism to provide benefits, however SUB will address the principles in such a way to capture that potential outcome.

1. *The DSIs will not pay less for power than other customers per MWh, and no financial payments in lieu of power sales would be provided where such payments would cause the DSIs' net cost of power (for the portion supported through the BPA transaction) to drop below the flat PF rate equivalent.*

SUB Response: SUB agrees, in part. Surprisingly, BPA's principle would bypass a rate issue regarding establishment of an IP rate[12]. BPA should remove the reference to a "PF rate" and replace it with "IP rate". In addition, BPA should change the phrase "*The DSIs will not pay less for power than other customers per MWh...*" to "*The DSIs will not pay less for power what they would pay under an IP rate...*"

2. *Contract terms will be no better than those offered to other customers.*

SUB Response: SUB agrees with this principle and strongly recommends its retention given historic favorable contract treatment to DSIs.

3. *The power or financial benefit will only be provided in support of actual DSI operations and employment, and the DSI must be purchasing and consuming an amount of power in support of production operations to receive any Federal Columbia River Power System (FCRPS) benefits.*

SUB Response: SUB is concerned that a direct power sale from BPA that would result in higher costs or loss of surplus revenue that would lower preference rates to preference customers than if a direct power sale had not occurred. BPA's reference to financial benefits through a power sale is unclear and a slippery slope with regard to what exactly BPA is providing. SUB suggests removing reference to a direct power sale in this principle, or any principle related to DSI service. BPA should remove the term "power or" in this principle. DSIs should still be required to purchase an amount of power to support production, but not from BPA.

[12] Compounding concerns that this process would circumvent rate directives.

4. *There will be no resale potential by DSIs if there are power deliveries.*

SUB Response: Given the devastating impact in 2000-2001 of the DSIs ability to resell BPA power which held the region economically hostage, SUB strongly supports this principle if there are power deliveries – however, SUB recommends that there be no direct power deliveries from BPA (see Principle 3)

5. *Service through local utilities is the preferred path.*

SUB Response: SUB proposes the following amended language: "Service through local utilities is the preferred path, as long as BPA's obligations are not tied to local utility service." BPA's language is overly broad and SUB's language is intended to prevent BPA's principle from being used to have local utility service be the vehicle to increase BPA load obligations to DSIs (e.g. by circumventing or modifying the New Large Single Load Policy to increase DSI service).

SUB proposes the following principles (Again, while SUB addresses both physical and financial transactions, SUB's recommended path is that benefits be provided through a financial transaction rather than physical sale of power):

1) There will be no direct power sale to DSIs that would result in higher costs or loss of surplus revenue that would lower preference rates to preference customers than if a direct power sale had not occurred.

   Without this type of principle, BPA could be stuck with real-time delivery costs and other costs that would harm other customers. However, should BPA adopt SUB recommendation that benefits would not be linked to a power sale, this principle can be removed.

2) DSIs would not receive preferential treatment associated with transmission service and any benefits would be subject to BPA Transmission Business Line non-discriminatory business practices and procedures.

   This is important because DSI benefits should not be guaranteed power benefits at the expense of power deliveries, reliability, and service discrimination to preference customers.

3) Should DSIs receive benefits, the contract between BPA and the DSI customer would specify that the DSI agrees not to receive benefits from BPA after September 2011.

   This is similar to contracts that were signed by DSIs for current service in which they agree they have not right to direct service after 2006.

4) BPA will memorialize its position in this Record of Decision that it will enforce DSI contract language that the DSI agree not to receive benefits after September 2011 and will not provide DSI benefits after September 2011.

   There are currently three contracts with DSIs that specify that DSIs have not right to BPA service after 2006. BPA sold this to preference customers as a benefit to the contracts *(couching the benefits as temporary) and now BPA appears to be stepping away from its commitments to preference customers by attempting to re-open service to these DSIs post 2006. A devastating deal in 2000 is getting much worse.*

5) Should BPA propose a power sale as the vehicle to provide benefits to DSIs, the power would be interruptible to meet the needs of preference customers and would be curtailed at no cost to BPA prior to any other re-dispatch of regional resources in the event of a transmission constraint.

   Again, BPA's own documents highlight the devastating regional impact due to DSI operations in constrained operating conditions. DSIs should be curtailed first to solve regional insufficiencies if they receive any benefits from BPA.

Areas BPA Requested Specific Input

1. *What are the potential costs to other customers or constituent interests of BPA serving DSI loads at various levels of benefits; the implications of such cost burdens; and how this might direct us in terms of sizing DSI benefit levels.*

SUB's response: First, there are hundreds of millions of dollars in existing costs associated with historic DSI service that preference customers would bear in the future even if BPA did not provide any benefits to DSIs in the future (see above). Regarding compounding these costs with additional service, BPA's statements and figures speak for themselves. According to BPA, in the WP-02 process the 1000aMW power sale to DSIs resulted in incremental costs to preference customers of upwards of $1.4 billion. This translates to $1.4 million per aMW or $160/MWh per MWh. SUB suggests BPA use BPA's own figures as a benchmark for impacts of DSI service on other customers as a starting place.

In addition, BPA cited concerns regarding regional blackouts during 2000-2001 should the DSIs operate. Specifically, BPA stated "Another 1,000 aMW of DSI load would increase the chances that the system will be pushed 'over the edge' into blackout conditions."[13] This would result in billions of dollars of damage to the regional economy.

Some may dismiss the recent power crises as an anomaly and dismiss BPA's facts as irrelevant. However, the California Energy Commission recently stated: "Over the next several years, California faces significant challenges in ensuring adequate electricity supplies to keep California's lights on during critical peak demand periods."[14] Using the Northwest Power Council's recent findings, the Northwest's modest resource surplus would quickly disappear if additional DSI load were to return.[15]

[13] BPA Fact Sheet, April 19, 2001, page 1

[14] California Energy Commission 2004 Update to the 2003 Integrated Energy Policy Report, Docket #03-IEP-01, November 3, 2004 – Executive Summary, page 1, first sentence.

[15] The Northwest Power and Conservation Council's Power Supply Outlook 2005 indicates only 1500aMW of regional surplus under critical water (see page 6 of 10)

Given the burden of existing costs associated with historic DSI service and cost exposure with DSI operations, any DSI financial benefit should be minimal. Given the socio-economic harm from DSI service already acknowledged by BPA, BPA should consider conducting an environmental impact statement should BPA offer any level of service to the DSIs.[16]

2. *What are the implications of this decision for retaining relatively high paying jobs? We would like to hear more about the business plans of companies, the potential number of jobs at stake and the relationship of power costs, terms and conditions to plant operations.*

SUB Response: SUB is pleased that BPA's question is non-discriminatory and deals with all high paying jobs – not just DSI jobs. Again, SUB points to the 2000-2001 power crises in which, according to BPA, DSI operations would have resulted in the loss of four high paying jobs for every one DSI related job if the DSIs had operated. FERC and California regulators have recently pointed to regional shortages. Based on the facts, the implications of a decision to provide benefits to DSIs would adversely impact high-paying jobs in other industries by a four-to-one ratio for every 1000aMW purchased by DSIs - for every high paying DSI related job retained, four high paying jobs are lost in other industries. For a 500aMW sale, as BPA proposes, two high-paying jobs in other industries are lost for every one DSI related job created.

3. *What are the appropriate eligibility criteria, and the rationale for such criteria? Should DSI contract performance during the current rate period, and DSI choices with regard to the disposition of remarketing benefits in 2001, be considered in 2007-2011 eligibility criteria? If so, how?*

   Eligibility Criteria should include:

   Creditworthiness: A Standard and Poor's credit rating of A+ or better.
   BPA has suggested that a DSI should be creditworthy but has not proposed a standard for measuring creditworthiness. A Standard and Poor's credit rating of A+ or better is a reasonable standard. At a minimum, it should not be below the creditworthiness standard BPA has for products sold to preference customers, such as Slice customers. To do otherwise would be discriminatory, establish a meaningless standard, and conflict with BPA's proposed principle #3 (contract terms no better than those offered to other customers).

   Should BPA only provide benefits through a financial transaction not tied to a power sale, SUB's concerns regarding creditworthiness are reduced, but do not go away entirely. Because a credit rating is a measurement of a company's long term viability and reflects on job stability, creditworthiness remains an important factor[17]. In the event of a financial transaction, BPA should retain a creditworthiness standard of Standard and Poor's credit rating of BBB+, or better.

[16] Particularly if resource acquisition, market purchase, or lost revenue are a result of any proposal - since the consequences are potentially similar to, if not more severe than, BPA's participation in the Phase II Hydro Thermal Power Program and power contracts to Aluminum companies in the mid-70's (in which BPA was required to conduct an EIA).
[17] Why throw good money after bad?

DSI did not agree that BPA had no obligation to serve after 2006.
BPA signed three agreements with DSIs in which DSIs acknowledged BPA had not obligation to serve them after 2006. Presumably they received some benefit in return. BPA should not provide benefits to these DSIs after 2006.

DSI has paid historic financial obligations to BPA in full.
Some companies are bankrupt and/or have not paid historic financial obligations to BPA. DSIs must repay BPA all historic financial obligations.

DSI has provides wages and benefits to workers equal to, or better than, the industry average.
BPA has emphasized relatively high paying jobs as the reason to provide benefits to DSIs. Without attaching this, BPA continues to invite BPA funds to be used for purposes other than BPA's intended goal.

DSI has demonstrated a substantial financial commitment toward providing non-BPA power sources toward the long-term operation of the local DSI facility.
BPA should require that DSIs demonstrate they are serious about the long-term viability of the plant with a long-term, not BPA power supply.

4. *What is the most logical and sustainable method of providing these benefits?*

1) A DSI must meet the eligibility criteria above.
2) Any benefits should be financial only and not a power sale.
3) Benefits should be provided only toward plants that operate.
4) Benefits would be based on a measurable market index (Mid-Columbia) minus the calculated IP rate to arrive at a Benefit Margin ($/MWh)
5) DSI Benefits would be calculated based on a virtual level of average megawatts (500 aMW) multiplied by the Benefit Margin (500 aMW times 8760 times the Benefit Margin in $/MWh)
6) Total annual DSI Benefits applied to all DSIs would be capped at $40 million per year (or less).
7) DSI Benefits would be distributed based on the relative number of employees at a DSI facility relative to the total number of employees at all DSI facilities. If BPA is truely concerned about jobs, benefits should be linked to jobs.
8) A "$ per full time employee benefit cap per year" for any DSI. This is important for two reasons – it encourages job retention and growth and also ensures that a single DSI customer does not receive a disproportionate level of total DSI Benefits. SUB suggests a $25,000 (or less) per Full Time Employee (FTE) benefit cap per DSI facility per year. A Full Time Employee would be defined as a full time employee employed at the local DSI facility for more than a year. According to BPA's figures there are currently 1,300 employees of DSIs. $40 million in benefits divided by 1,300 is $30,769 per employee. The maximum number of employees is approximately 6,500, or ($40 million divided by

6,500) equals $6,152 per employee[18]. The suggested $25,000 per FTE per year benefit cap is higher than the average of these two figures ($18,462). It strikes an appropriate balance of providing benefits and providing an incentive to DSIs to retain, train, and expand the work force.

5. What terms and conditions can increase or decrease risk for other BPA customers?

1) BPA must place a cap on the total amount of DSI benefits distributed each year. The cap should not exceed $40 million/year.
2) BPA should calculate the level of DSI benefits in the upcoming rate case(s) and prescribe annual maximum benefits within each rate period.
3) There should be no minimum level of benefits (BPA should not provide payments to DSIs if BPA's IP rate is higher than the market).
4) DSIs contracts with BPA would state that DSIs acknowledge that BPA has no obligation to provide benefits to DSIs after September 2011.
5) BPA would affirmatively state in the Record of Decision for this process that it will not provide benefits to DSIs after September 2011.
6) Benefits should be provided "after the fact". After every quarter (or six months), BPA would determine which DSIs were eligible to receive benefits and, for those eligible DSIs, would provide a pro-rata benefit for the quarter if the DSI facility operated and subject to the $ per full time employee benefit cap per year.
7) There should be no carry-over of calculated, undistributed DSI Benefits to future periods. For example, if DSI Benefits in 2007 were calculated at $30 million, yet the $ per full time employee benefit cap limited the total distribution in 2007 to $25 million, the outstanding undistributed amount ($5 million) would not be carried over into future periods.

Conclusion

In BPA's Regional Dialog Record of Decision, BPA stated that SUB did not "definitively argue that BPA should not serve DSI load."[19] To be absolutely clear: it is SUB's position, based on facts and arguments above, that BPA should not serve DSI load.

Public Power historian Gus Norwood wrote:

> "More than two thousand years ago the Greek historian Polybius declared that the purpose of history is not satisfied by mere narrative and chronology. He held that history can and should be instructive: that we should be able to learn from history...A policy history must focus on policy and must address the question of 'why'"[20]

What we've learned, with the help of BPA, is that DSI service has historically placed the regional economy in peril. The question of "why" BPA has continued to provided service to DSIs has historically been answered by unfulfilled promises of a "temporary" solution and false

[18] *See* BPA Briefing to the Washington PUD association, January 5, 2005 page 3
[19] BPA's Policy for Power Supply Role for FY 2007-2011 Record of Decision, February 2005 page 39 of 103
[20] Columbia River Power For The People – A History of Policies of the Bonneville Power Administration, DOE-BP-7, 1981. pages ix, x

benefits associated with DSI service. SUB is willing to be forward thinking, but will not distracted by empty promises of tomorrow and encourages BPA to do the same.

SUB has submitted these comments in the interest of furthering dialog on the issue and would invite BPA to resolve other issues in conjunction with DSI issues rather than in isolation. Despite BPA's analysis of the regional economic hardship associated with DSI service, SUB would support BPA should BPA implement all of SUB's recommendations in this letter. Should BPA opt to select a subset of SUB's recommendations, any support would be contingent on final review of the DSI benefit proposal.

Respectfully submitted,

_______/s/_________

Jeff Nelson
Springfield Utility Board

cc: SUB – Bob Linahan, Bob Schmitt, Tamara Johnson
BPA – Paul O'Neal, Tina Ko, Angie Quinata

Attachments

BPA FACT SHEET
The role of direct service industries in the regional effort to reduce rates

April 19, 2001

***NOTE:** To ensure full compliance with the letter and the spirit of ex parte rules, all BPA employees who may have reason to discuss the contents of this fact sheet with outside parties are cautioned not to listen to or otherwise entertain or engage in communications regarding the merits of tiered rates or any other rate case issue.*

Background

To avoid a potential 250 percent, or greater, increase in BPA's wholesale rates this October, BPA, its customers and the region as a whole, must develop solutions to the problem of reducing BPA's load requirement by the end of May. The most direct way to control the size of BPA's rate increase is to minimize the amount of power that BPA must purchase in the spot market. To be successful, public and private utility customers as well as industrial and retail consumers must collectively reduce Northwest energy consumption on an unprecedented scale. BPA is calling for load reductions *now* by all Northwest electricity consumers to avoid the potentially severe economic consequences of a triple digit wholesale rate increase later this year. If this load reduction effort is successful, the potential BPA rate increase can be brought down from 250+ percent to below 100 percent.

Questions and answers

1. **What if the DSIs refuse BPA's load reduction offer and resume operation in October, placing an additional 1,000 average megawatts of load on BPA?**
   This would likely result in:

   - $1.5 billion in additional annual costs because of spot market purchases BPA would have to make to meet its loads in the 2002 alone. This $1.5 billion annual cost would have to be collected from BPA customers in the form of significant additional rate increases.

   - Increased risk of blackouts in the Northwest this winter because the regional power system is already being pushed to the limit. Another 1,000 aMW of DSI load would increase the chances that the system will be pushed "over the edge" into blackout conditions. This fall and winter, all else being equal, another 1,000 aMW of DSI loads would totally offset the intensive conservation and new resource construction efforts going on in the region right now.

   - Likely failure of BPA's effort to limit the average size of the October rate increase, resulting in an overall average increase for the region of about 250 percent or more. This is likely both because the DSI load would drive the rate increase up and because other customers would be much less likely to reduce their load demand on BPA if the DSIs refused to do so.

   - Much greater loss of jobs throughout the region. The economic model developed for the regional Aluminum Study Group last year indicates that the rate increases caused by reopening aluminum smelters this fall could cost the region 4 jobs in other industries for every job created in the aluminum industry and related businesses.

- A very high cost to regional ratepayers for each aluminum industry job created. For every dollar in aluminum industry wages paid, regional ratepayers would pay roughly $10 in BPA rate increases to cover the cost of power purchased for the DSIs.

- No economic help for those smelter workers who are displaced. All aluminum companies except Kaiser have agreed to compensate their workers during their shutdowns, at least through September. BPA is offering to provide funds to prolong this compensation for up to 2 more years, if the companies agree now to delay restart of their plants. BPA will not have this employee funding available if the companies wait until this fall and then decide they cannot operate. Waiting puts smelter workers' compensation at risk.

- The need to use more water to generate power that otherwise may be available for hydro operations to benefit endangered fish under many water supply conditions.

2. **Why does BPA believe the DSIs will not be able to operate profitably after October 1, 2001, if rates increase by 250 percent or more?**
In recent years, these companies were paying BPA about $22/MWh for power supply. The companies have frequently stated to BPA that it is not possible for them ot operat at wholesale electricity prices above $30/MWh. Whether the companies pay the market rate of $210/MWh, or BPA's rate with a 250 percent increase (about $60/MWh), it is unlikely that they would be able to profitably resume operation this fall.

3. **Is it true that BPA wants to put the DSIs out of business?**
No. BPA would like to see at least some of the DSIs continue to be a viable part of the region's economy. Almost all aluminum smelters are shut down now because the industry found it more profitable to resell federal power than to operate. Until the regional power system recovers from the current shortage, power prices are unlikely to fall low enough to allow smelters to operate and their operation will further tighten power supply. BPA's recommendation that the companies delay resuming operations for one to two years is based on its assessment of the realities of the system and market. In one or two years, there is every chance that prices will have fallen low enough to again allow profitable operation for some of the aluminum industry. In the long term, BPA would like to work with the DSIs to help them become more self-sufficient in energy supply and end their reliance on an oversubscribed system by 2006. BPA is not required by law to continue to serve them after 2006 and three of the companies have agreed contractually that they have no right to direct service with federal power after that time.

4. **But isn't BPA telling the DSIs that they have to stay shut down?**
No. BPA is asking for their agreement to delay resuming operation. And BPA is offering to pay limited amounts for the planning certainty that agreement would provide.

5. **Is BPA saying that 7,000 aluminum plant workers must, in effect, sacrifice their livelihoods for "the collective good" of the rest of the Northwest?**
   No. Nowhere near 7,000 aluminum plant workers would be employed even if the DSIs took all the power they are entitled to in BPA contracts. The number of workers actually employed in aluminum production using BPA power is closer to 3,000. And significantly far more jobs than this would be lost in other industries if BPA rates increase by 250+ percent. Finally, BPA is willing to provide limited compensation to the companies and their employees to help mitigate for the effects on them and local communities of a one to two-year delay in restart of operations. Unlike those in other industries who would lose their jobs to a significant BPA rate increase, the aluminum workers would not be left "out in the cold."

6. **Isn't there a national security issue with keeping all this aluminum production offline?**
   We don't think so. Over the past 50 years, these smelters have periodically suspended production many times due to economic conditions and then restarted when they were needed. The same is true now. The smelters would be available to operate if needed in an emergency.

ALCOA

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March 11, 2005

DSI-077
MAR 14 2005

Stephen J. Wright
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Dear Mr. Wright:

I regret that unchangeable plans kept me from attending the March 1 DSI forum in Portland. Future BPA service to Intalco is my second priority, right after employee safety, and I would like to take this opportunity to provide you with my comments.

First, it is obvious that you recognize that Alcoa has been an important part of the Northwest economy for decades, and needs affordable electricity to continue in that role. We have asked that you continue the current level of service to us just like you plan to do for other industries served by consumer-owned utilities.

It is also obvious that you have a concern about the overall level of BPA rates, and the costs that are associated with meeting load growth while continuing to serve existing customers.

You are engaged in a delicate balancing act. On one hand you would like to make enough power available to the aluminum industry to give us a chance to survive, but on the other hand you would like to minimize rates for other BPA customers.

One approach – the one taken in the BPA straw proposal -- would be to set limits on the total benefits available to DSI customers, and spread the limited benefits among several plants in the Northwest. While this does serve the goal of protecting all the Northwest ratepayers, the problem is that by spreading the BPA power so thinly, **none** of the Northwest plants that rely on BPA power will be able to compete in the long-run.

We believe that if you are not going to offer to extend all DSI contracts in their current amounts, a better way to allocate the limited amount of power available would be to serve the plants that will make the best partner for BPA and its customers in the future with enough power to make a significant difference – enough power to ensure its long-term existence and the ability of its owners to confidently decide that additional investment in the plant can earn a return. By allocating enough power to Alcoa, at the same rates paid by consumer owned utilities for resale to their industrial customers, you will be improving the odds of maintaining some aluminum-related jobs in the Northwest in the long-run and assuring BPA and its other customers of just such a solid partner for the future.

Sincerely,

Mike Rousseau

Mike Rousseau
Plant Manager

DSI-078
MAR 14 2005

March 11, 2005

Mr. Steve Wright
Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, Oregon 97208

Dear Mr. Wright:

The undersigned community leaders in Norwest Washington are pleased that you have decided to continue some form of service to your Direct Service Industrial customers after current contracts expire in 2006. We also appreciate that you personally have decided to chair an open forum on March 1, 2005 to help you decide the amounts of DSI service, mechanisms for providing such service and eligibility criteria.

We are very concerned that you make the right decisions regarding future service to the Alcoa Intalco aluminum plant near Ferndale, however, the time for public input at your March 1 meeting is limited, and so we are sending this letter instead of attending the meeting in person.

The Intalco plant is a vital part of our community, and that plant needs enough low-cost power to operate at near capacity to be competitive with other primary aluminum plants in the world. Intalco and the community have relied on BPA service to that plant since it was opened in 1968, and believe that you should, at a minimum, continue the same level of service contained in Alcoa's current contract. This power should be sold to Alcoa at the same rate offered to other long-standing companies traditionally served directly or indirectly with BPA power.

Sincerely,

Please see attached pages for signatures

Name	Title
[signature] Roger Lehnert	Superintendent of Schools - Ferndale
Pete Kremen	W.C. Executive
[signature] Rob Pochert	Executive Director Bellingham/Whatcom EDC
Jerry Landcastle	Mayor City of Ferndale
Wendy Wollam Scheuer	Executive Director Nooksack Salmon Enhancement Assoc.
[signature]	President Bellingham Technical College
David Harding	CEO Whatcom Family YMCA
[signature]	Western Washington U - DRF - Univ [illegible]
[signature]	Whatcom Volunteer Center
[signature] - Pete Atha	United Way Whatcom County
K. M.	Executive Director, Whatcom Literacy Council

DSI-079
MAR 14 2005

Public Power Council

1500 NE Irving, Suite 200
Portland, Oregon 97232
(503) 232-2427
FAX (503) 239-5959

March 11, 2005
Transmitted via Electronic and U.S. Mail

Paul E. Norman
Senior Vice President, Power Business Line
Bonneville Power Administration
P.O. Box 14428
Portland, OR 97293-4428

RE: The Public Power Council's Comments To BPA On The Direct Service Industries (DSIs)

Dear Paul:

We are pleased to provide BPA with these comments on service to the DSIs during FY2007-2011. Although there is considerable diversity in views within public power regarding continued DSI service, we have identified a set of core principles that should be observed in providing benefits to the DSIs.

Any Proposal BPA Makes Regarding The DSIs Must Fit Under The 27 Mill Rate Cap

First and most importantly, any proposal that BPA makes with regards to the DSIs needs to fit under the 27 mill rate cap that we have said that BPA should observe in the next rate period. An initial weakness in PBL's Power Function Review (PFR) process was that the PFR simply consisted of presenting cost estimates for various areas of PBL without reference to how all these various cost estimates added up an overall cost, and how that overall cost translated to a post-2006 PBL rate. PBL has commendably made changes to the PFR process to allow better consideration of the overall impact of the various parts of the PFR. We feel that any proposal to provide benefits to the DSIs also cannot be viewed in isolation, but needs to be part of a larger rate strategy. (The 27 mill rate cap is more than 20% higher than the BPA rate that prevailed prior to the energy crisis.)

The Cost Of Any Service To The DSIs Should Not Exceed $40 Million/Year

As part of ensuring that DSI benefits stay under the 27 mill rate cap, the cost of any service to the DSIs should not exceed $40 million/year, which works out to about a half-mill increase in BPA's rates. One of the worrisome things that became evident when BPA conducted its workshop on DSI service on March 1 is that the DSIs also have considerable differences of opinion regarding potential BPA service to the DSIs. If one added together the requests for benefits that DSI representatives made at that workshop, the total amount of MWs requested would be almost twice the amount proposed in BPA's 500 MW/$40 million/year straw proposal.

A cap is important in order to limit BPA's (and BPA customers') liability in the event of another energy crisis. BPA should not think that it has agreed to a $40 million level of benefit to the DSIs, only to discover that the agreement has morphed into a $400 million or a billion dollar level of benefit.

BPA Should Not Obligate Itself To Ensuring That The DSIs Are Capable Of Operating Under Any Set Of Market Conditions

The fact that the sum total of DSI requests for power were nearly double those laid out in the straw proposal is even more troublesome when coupled with statements by DSI representatives that a 10 mill subsidy would not be sufficient to get smelters operating – that the subsidy would have to be around 20 mills. Combining the DSIs request for near-doubling of the total amount of MW provided the DSIs plus a doubling of the subsidy provided per MW would lead to a cost of serving the DSIs on the order of $150 million, not $40 million.

BPA has noted that it is not obligated to serve the DSIs. BPA's determination that it is going to provide some level of benefit to the DSIs should not be interpreted as an obligation that BPA must to provide a level of subsidy sufficient to guarantee operation of the smelters under any circumstances. Power market prices are currently quite high (exacerbated by the persistence of the Northwest drought, of course), and alumina prices (a major input to the aluminum smelting process) are now also at a very high level. BPA should not feel compelled to offer a subsidy to ensure that smelters operate, given both the effects of the drought and the high international market price of alumina. The 10 mill level of benefit proposed in the straw proposal should provide a reasonable chance for the smelters to operate if and when power and alumina prices are closer to historical levels.

BPA Should Try To Maximize The Chances That DSI Benefits Track BPA's Rates To Its Other Customers, Subject To the $40 Million Cap

We consider the $40 million cap to be a prerequisite for offering benefits to the DSIs. While that cap is a paramount consideration, it would also be desirable for the level of DSI benefits to fluctuate with the changes in the rate that BPA charges other customers. This implies that under some circumstances, the level of DSI benefits should be under the cap – if the DSIs simply get $40 million in benefits no matter what is happening to BPA's costs and rates, then the DSIs would lose interest in controlling the level of BPA's costs and rates. While keeping DSI benefits under the cap may not always be possible, trying to maximize the circumstances when this occurs is desirable. Thus we oppose the plan offered by some DSIs that if some of the companies are unable to utilize the benefit provided by BPA, that those benefits should then automatically flow to other DSI companies, effectively making the $40 million a floor on DSI benefits, as well as a ceiling. Benefits to the DSIs should be determined on a company-by-company basis.

BPA Should Provide Benefits To The DSIs In A Manner That Does Not Place Undue Reliance On BPA's Settlement Authority

While we do not opine on what the precise mechanism that BPA should use to provide benefits to the DSIs, we would like to caution BPA not to use one that relies unduly on BPA's settlement authority. We are currently involved in litigation against BPA offering benefits to the IOUs, based on BPA's broad interpretation of its settlement authority, and we want to avoid becoming embroiled in this issue again over benefits to the DSIs.

There Are A Number Of Other Important Features That Should Be Included In Any Offer Of Benefits To the DSIs

We have identified a number of other important features that should be included in an offer of benefits to the DSIs (several of them drawn from BPA's straw proposal). For simplicity's sake, they are listed in bullet form:

- BPA should minimize credit risk in providing benefits to the DSIs, since preference customers suffer the consequences of DSIs defaulting on their obligations to BPA.

- The DSIs should not have remarketing rights.

- Under no circumstances should the rate paid by DSIs be lower than the rate paid by preference customers.

- Any power supply arrangement with the DSIs should not reduce the amount of power available to allocate to the preference customers for the post-2011 period.

- The DSIs should receive benefits only if they actually operate their Northwest facilities.

- The IOUs should share in the cost of providing DSI service.

- The DSIs should not receive better contract terms (duration, etc.) than those presented to other customers.

Thank you for the opportunity to submit these comments.

Sincerely,

C. Clark Leone
Manager

PPCDSICts0311.doc

DSI- 080
MAR 14 2005

Kuehn,Ginny - DM

From: AnonymousComment@somewhere.com
Sent: Friday, March 11, 2005 2:44 PM
To: BPA Public Involvement
Subject: Comment on Additional Comments on BPA Service to DSI Customers

Comment on **Additional Comments on BPA Service to DSI Customers**
View open comment periods on http://www.bpa.gov/comment

Dale McGuire
IAMAW
No E-mail Address Submitted
360-384-1188
6677 Enterprise Rd.
Ferndale WA 98248
Dear Sirs, I would like to comment on the recent February 4, 2005 "Straw Proposal" put forth by BPA. I do not believe the proposal addresses the real concerns of many of us in the Northwest. In order for DSI's to survive in the region there needs to be an allocation and pricing formula which enables businesses to be competive. This proposal is at best "survival mode" and may not be enough to keep Alcoa or other DSI's alive. I work for Alcoa Intalco Works in Ferndale, WA. and have watched our workforce go to great lengths to keep our plant viable for the future. But our efforts will not be enough if power allocation and pricing do not enable our plant to be profitable. Therefore, I am supporting the Alcoa Propo- al which I believe would offer Alcoa and other DSI's which have the ability to succeed in the region the opportunity to do so. Obviously I want to be able to keep my job and take care of my family but I am also concerned at the cost to the community and the region if companies like Alcoa are forced to move their businesses elsewhere. Thanks for listening. Dale McGuire

State of Washington House of Representatives

RECEIVED BY BPA
ADMINISTRATOR'S
OFC-LOG #: 05-0034
RECEIPT DATE: 3.10.05
DUE DATE: 3.24.05

DSI-081

March 9, 2005

Mr. Stephen J. Wright
Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

ASSIGN: DR-7C
cc: FO3, DC/Wash, L-7, P-6, PL-6, [redacted] DR/WSGL, DR/Spokane

Dear Steve:

It has been brought to our attention that the Bonneville Power Administration (BPA) has initiated a "Regional Dialogue" process in order to facilitate a decision as to how BPA will market power and distribute the costs and benefits of the Federal Columbia River Power System in the Northwest after September 30, 2006. It is our understanding that BPA will not be able to implement a long-term program prior to the time existing contracts with Direct Service Industrial (DSI) customers expire, and it is seeking public opinion on future electrical service to DSI customers in the short-term. We are writing to provide input on behalf of Alcoa, Inc. (Alcoa), as well as other DSI customers (both current and former) that will rely on BPA to provide sufficient low cost power in order to operate their business. In short, we are requesting the BPA to treat Alcoa and other Washington DSI customers like other qualifying industrial loads that have traditionally purchased BPA power from their local consumer-owned utilities.

In the case of Alcoa, BPA has served this company's energy loads in the Northwest since 1940. During the 1996-2001 contract period, BPA provided enough power for Alcoa to serve five aluminum reduction plants. Alcoa then sold one plant which lowered its demand. In the subsequent contract that commenced October 1, 2001, BPA lowered Alcoa's power supply by approximately 42 percent to 438 MW – which contributed to Alcoa's decision to shut down two plants and removing one potline in a third. Alcoa needs 625 MW to meet the full load requirements of its two remaining plants (Wenatchee Works and Intalco). Thus, because Alcoa is operating its plants at less than full capacity, the cost to produce aluminum is higher. This current limited production level is not sustainable for the long-term.

Because BPA is planning to offer new long-term contracts to its consumer-owned utilities in the near future, a short-term contact with Alcoa is necessary in order to enable Alcoa to operate using existing contract amounts (438 MW) until those long term contracts are in effect for all BPA customers. However, in order to meet the full load requirements of Alcoa's remaining two plants, Alcoa would need a total of 625 MW. We request that this amount be considered in the long-term allocation process that BPA intends to conduct later this year. In the meantime, Alcoa has proposed a fair, short-term proposal that includes the following components:

1. BPA should offer to sell 438 MW of power to consumer-owned (public) utilities for service to Alcoa for the next rate period (October 1, 2006 through September 30, 2009). This will extend the current level of service to Alcoa until BPA can offer new, long-term contracts to all BPA customers. Long-term service to Alcoa and other regional consumers after October 1, 2009 should be determined at the same time following completion of BPA's Regional Dialogue.

2. BPA should sell this power at a rate that is equivalent to the rate paid by other consumer-owned utilities for service to their long-standing industrial loads.

3. To protect BPA and its customers from extreme market rates, Alcoa is willing to provide "catastrophic insurance" by agreeing to temporarily reduce purchases of BPA power if BPA faces

high purchase power costs such as those in 2000/2001. This essentially will put a cap on BPA's exposure to the market, and, if market conditions again become unstable, will reduce rates and rate volatility to other BPA customers.

By providing service to traditional Alcoa loads under the same terms as other similarly-situated industries in the Northwest, this short-term agreement places Alcoa on a level playing field with other consumers in the region. Although 438 MW is not enough power to run both plants at full capacity, it will allow for the potential for Alcoa to retain and create jobs, make necessary capital improvements, and operate at increased efficiency. While this interim contract is in place, it is our understanding that Alcoa will work with other BPA customers in an attempt to implement a secure and sustainable BPA long-term role under which BPA is able to serve existing customers at low and stable rates.

BPA has a long-standing history with many Washington DSIs – some of which have struggled to survive in the Northwest's dynamic economy. As Washington's economy improves, former DSIs of BPA now have the capability to re-start operations and employ hundreds of people. However, the ability to obtain sufficient, low-cost power from BPA serves as the crucial hurdle that must be overcome. Goldendale Aluminum Company, for example, deserves consideration to receive an equitable distribution of power from BPA. BPA's decision with respect to companies like Goldendale will certainly have a profound impact on Washington State. Therefore, we ask that BPA adjust their initial proposal in order to take into account the needs of other industries that depend on sufficient, low cost power for their survival.

We appreciate your time and consideration in this matter and look forward to news that a short-term contract was successfully negotiated.

Regards,

Representative Bruce Chandler
Republican Leader
15th Legislative District

Representative Mike Armstrong
Deputy Republican Leader
12th Legislative District

Representative Jan Shabro
Republican Caucus Chair
31st Legislative District

Representative Doug Ericksen
Republican Floor Leader
42nd Legislative District

Representative Dan Newhouse
Republican Assistant Floor Leader
15th Legislative District

Representative Jay Rodne
Republican Assistant Floor Leader
5th Legislative District

Representative Jim Clements
Republican Whip
14th Legislative District

STATE REPRESENTATIVE
42nd DISTRICT
KELLI LINVILLE

State of Washington House of Representatives

ECONOMIC DEVELOPMENT, AGRICULTURE & TRADE
CHAIR
APPROPRIATIONS

RECEIVED BY BPA ADMINISTRATOR'S OFC-LOG #: 05 · 0035
RECEIPT DATE: 3·11·05
DUE DATE: 3·25·05

DSI-082
MAR 14 2005

March 7, 2005

ASSIGN: DR-7C
cc: FO3, DC/Wash, L-7, P-6, PL-6, [redacted]
DR/WSGL, DR/Spokane

Stephen J. Wright
Administrator
Bonneville Power Administration
905 N.E. 11th Avenue
Portland, OR 97232

Dear Mr. Wright:

Because of our Legislative Committee cut-off deadline, I was unable to attend the Open Forum March 1, 2005. Therefore, I trust you will thoughtfully consider these comments regarding the appropriate DSI benefit level and the "straw proposal."

Like you, the Washington Legislature is trying to balance the interests of stakeholders while grappling with demands that far exceed our resources. As you know, I chair the House Economic Development, Agriculture and Trade Committee. Our committee is striving to determine the best ways to sustain and grow our economy in the midst of significant state budget challenges. After weeks of work sessions, testimony, research and dialogue with policymakers and constituents, it is increasingly clear that Washington, and indeed, the entire region's economic health is dependent upon our ability to nourish business and industry which succeeds in the export market. A case in point is the aluminum industry.

The Northwest used to be home to a flourishing aluminum industry, which was recruited to the Northwest partly to help with national defense and partly to provide the financial commitments to purchase power that made the creation and long-term viability of BPA possible. The industry has benefited the region for decades. BPA chose to provide power directly to the aluminum industry and a few other Direct Service Industries (DSI's). Today, because of that choice and the subsequent restriction on new large single loads, DSI's today are not allowed to buy power from their local utilities. Frankly I fail to see the rationale for treating these industrial customers differently from any other business. And as you know, if DSI's were treated the same as other industrial loads, there would not even be a question today about denying them cost-based power. It's only fair, and it's economically smart to work with the DSI's to develop a feasible plan for access to affordable power.

Unfortunately your "straw proposal" falls short. It greatly restricts the amount of power available to the DSI's and sets a cap on benefits that would cause them to pay more for power than if they were served by their local utility. This proposal is not good for the region and it could have a dire impact on my legislative district. You are well aware of how important the Alcoa Intalco Works plant is to my district and the town of Ferndale. Likewise, the Alcoa Wenatchee Works plant is vital to Chelan County. Together the Alcoa plants provide hundreds of family wage jobs and millions of dollars to the Northwest economy. Alcoa is a values based company that has contributed thousands of hours in community service and supported numerous environmental, educational and social programs. And, as an export industry, Alcoa's direct impact is but a small portion of their overall impact on the economy. Many other jobs and considerably more economic activities in the region are dependent upon Alcoa.

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DISTRICT OFFICE: 104 W. MAGNOLIA, #306, BELLINGHAM, WA 98225 • 360-738-6177
E-MAIL: linville.kelli@leg.wa.gov • FAX: 360-738-6178
TOLL-FREE LEGISLATIVE HOTLINE: 1-800-562-6000 • TDD: 1-800-635-9993

STATE REPRESENTATIVE
42nd DISTRICT
KELLI LINVILLE

State of
Washington
House of
Representatives

ECONOMIC DEVELOPMENT,
AGRICULTURE & TRADE
CHAIR

APPROPRIATIONS

I have heard some say that serving Alcoa will drive costs up for others. That seems to be a specious argument since Alcoa has been part of the system for over 60 years and their load is not increasing. In fact it has decreased. Alcoa is not the source of the supply problem. Why should they be kicked off the grid or restricted from receiving equal benefits of the hydro system? Would anyone suggest that other major manufacturers be denied power from their local utility?

Instead, BPA should recognize Alcoa's long-standing commitment to the region and assure that Alcoa has access to a supply of cost-based power sufficient enough to give them a chance to continue operating in the region. I urge you to give serious consideration to Alcoa's proposal and to work with them and other stakeholders to assure that BPA doesn't make a policy decision that forces Alcoa to close their plants and costs the state, the region and the country the loss of family wage jobs and the significant associated economic activity. It would not be possible to replace those jobs, especially in their rural communities.

Thank you for your thoughtful consideration.

Sincerely,

Kelli Linville

Kelli Linville
Chair, House Economic Development, Agriculture & Trade Committee

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