



OREGON TRAIL ELECTRIC COOPERATIVE

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February 11, 2010

Bonneville Power Administration
Public Affairs Office – DKC-7
P.O. Box 14428
Portland, OR 97293-4428

RE: Irrigation Rate Mitigation Program

As the General Manager of Oregon Trail Electric Cooperative (OTEC) and a Board Member of Northwest Irrigation Utilities, I signed the November 13, 2009 letter to BPA regarding the "Underpayment of Irrigation Mitigation Benefits."

On behalf of our Board and the over 1100 irrigation retail consumers of OTEC I want you to know how important this issue is to the community we serve. As members of NIU we have worked in good faith with BPA over the years and participated in the Irrigation Discount, Summer Seasonal Product, and now Irrigation Rate Mitigation Product. All of these programs were designed, in part, to protect summer intensive loads in rural areas from a BPA rate structure driven in large measure by the west coast marginal value of energy and the impacts of California markets.

BPA needs to be a dependable business partner and fulfill the terms of the contract we signed for the current 10-year period. We appreciate BPA recognizing the \$2 million overcharge that was made and look forward to resolving this issue in a manner that is equitable for the retail irrigation customers of Load Following utilities. Forging the overcharge, as BPA suggests, is not a reasonable or fair solution though.

I also request that you extend the comment period by 28 days to better allow utilities an opportunity to share this concern with its affected members in an affordable, yet timely, manner.

Let's not allow this to be yet another example of BPA acquiescing to the larger population areas and ultimately discounting the commitments it has made to the more rural areas.

Sincerely,

A handwritten signature in black ink, appearing to read "Werner Buehler".

Werner Buehler
Executive Vice President / General Manager

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