

PRE-AGENDA
FOR THE REGULAR MEETING OF
CLALLAM COUNTY PUBLIC UTILITY DISTRICT #1
BOARD OF COMMISSIONERS
JULY 11, 2022 AT 1:30 PM

Join Zoom Meeting: <https://clallampud-net.zoom.us/j/84366661040?pwd=UndtalBWMGtCRFptY0QxdVIIYTd0dz09>

Meeting ID: 843 6666 1040 | **Passcode:** 196444

One tap mobile: +12532158782,,84366661040#,,, *196444# US (Tacoma)

Find your local number: <https://clallampud-net.zoom.us/u/kclJEpBQCn>

- **Consent Agenda Items**

The Commissioners will consider approving Consent Agenda items.

- **RESOLUTION 2245-22 Appointing the District's Public Records Officer**

The Commissioners will consider Appointing the District's Public Records Officer.

Staff requests a motion, second and vote: approving RESOLUTION 2245-22 appointing Nicole Hartman as the District's Public Record Officer effective July 11, 2022.

- **Presentation of the Draft 2023 Strategic Plan**

Staff will present the Draft 2023 Strategic Plan to Commissioners.

- **Intervening in Petition Review for BP-22**

Commissioner Paschall will introduce this petition for review and discussion.

- **BPA Post-2028 Contract Discussion**

Commissioners and staff will discuss recent developments of the BPA post-2028 contract.

The Commissioners will also consider the customary business matters associated with approval of payments, minutes of the previous meeting, reports from Commissioners and staff, comments from the public, and other items of information or general business. Items may be added to, or removed from, the agenda at the meeting.

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1. CALL TO ORDER

2. COMMENTS FROM THE PUBLIC

3. AGENDA REVISIONS

4. APPROVAL OF CONSENT AGENDA

- a. Minutes of the June 30, 2022 special meeting;
- b. Claim vouchers for June 27 through July 5, 2022 for a total of \$1,097,083.52;
- c. Payroll vouchers for the period of June 16 through June 30, 2022 and for July 8, 2022; and
- d. Removal of delinquent accounts from the July 2022 active accounts receivable totaling \$18,478.65 including a 30% collection fee.

5. BUSINESS ITEMS

- a. RESOLUTION 2245-22 Appointing the District's Public Records Officer Sean Worthington
- b. Presentation of the Draft 2023 Strategic Plan Staff
- c. Intervening in Petition Review for BP-22 Rick Paschall
- d. BPA Post-2028 contract discussion Commissioners, Staff

6. CORRESPONDENCE/COMMUNICATIONS

7. COMMISSIONER REPORTS

8. STAFF REPORTS

9. BOARD ACTIONS FOR STAFF

10. COMMENTS FROM THE PUBLIC

11. EXECUTIVE SESSION

12. ADJOURN

CLALLAM COUNTY PUBLIC UTILITY DISTRICT #1

Minutes of the Special Meeting of the Board of Commissioners

Main Office | 104 Hooker Road | Sequim, WA 98382

June 30, 2022 at 11:00 AM - This meeting was held remotely via ZOOM

Commissioners Present

Will Purser, President

Rick Paschall, Vice President

Jim Waddell, Secretary

Staff Present via Zoom

Sean Worthington, General Manager

John Purvis, Assistant General Manager

Lori Carter, Controller/Auditing Officer

Ruth Kuch, Finance Manager/Treasurer

Teresa Lyn, Executive Assistant

Steve Schopfer, IT Manager

Mike Hill, Engineering Manager

Jamie Spence, HR Manager

Tom Martin, Water/Wastewater Manager

Terry Lind, Operations Manager

Xanthius Christenson, Engineer

Chelsey Jung, Payroll Coordinator

Nicole Hartman, Communications Manager

Eric Jacobson, Business Analyst

Colin Young, Distribution System

Supervisor

Others Present as Identified

Attorney Dave Worley

Bethany Rondeaux

Patty Morris

Rick Rupp

Heather Nicolson

Matt Chaney

Ken Hays

The meeting commenced at 11:00 AM.

PUBLIC COMMENT :33

Public comment was heard from a customer regarding a business meter hookup price increase.

AGENDA REVISIONS 3:55

No revisions.

CONSENT AGENDA 4:03

Upon recommendation of staff, and upon motion of Commissioner Paschall, seconded by Commissioner Waddell and carried, the Board approved the following consent agenda items:

- a. Minutes of the June 13, 2022 regular meeting;
- b. Claim vouchers for June 13 through June 20, 2022 for a total of \$2,938,504.42;
- c. Payroll vouchers for the period of June 1 through June 15, 2022; and
- d. Contractor prequalification for Osmose Utility Services in the amount of \$1,000,000 for the upcoming calendar year.

BUSINESS ITEMS STARTING AT 4:39

- a. **4:53:** Upon recommendation of staff, and upon motion of Commissioner Paschall, seconded by Commissioner Waddell and carried, the Board passed RESOLUTION 2241-22 and rescind Resolution 2236-22. This Resolution authorizes additions to the 2022 Schedule of Deposits and Charges and introduces a new service capacity charge that will shift the elevated transformer cost to customers requesting new service, as opposed to the existing rate payers.
- b. **18:48:** Upon recommendation of staff, and upon motion of Commissioner Paschall, seconded by Commissioner Waddell and carried, the Board passed RESOLUTION 2244-22 Authorizing Staff to Purchase Long Lead-time Vehicles and Equipment for 2023 and 2024 Budget Years.
- c. **24:43:** Commissioners and staff discussed recent BPA Post-2028 contract information. Topics discussed: recent utility requests to increase power generation; expected load-growth due to EV power needs, CETA requirements, and climate change expectations; the potential effect of BPA going into a big acquisition mode for power not sourced from hydro; and a suggestion for self-augmentation for larger utilities. General Manager Sean Worthington asked the Commissioners if they supported the WPAG draft proposal to support a \$31 million Columbia Generating Station upgrade study. Commissioners Paschall and Purser agreed with the WPAG draft as submitted and Commissioner Waddell advised he needed more information.

CORRESPONDENCE/COMMUNICATIONS 52:57

No correspondence or communications.

COMMISSIONER REPORTS 53:04

Commissioner Waddell attended integrated program review workshops, a WPUDA strategic plan meeting, and a WPAG meeting. Commissioner Paschall attended a WPAG meeting. Commissioner Purser attended an Energy Northwest (ENW) executive board meeting.

STAFF REPORTS 1:05:33

Water and wastewater Manager Tom Martin presented a detailed update the status of obtaining Carlsborg UGA water rights. Included in the update was an outline of shareholder interests; a report on the June 17th Ecology Mitigation Plan meeting; a diagram of the proposed service area expansion per the draft Memo of Understanding (MOU); an inventory of current water rights; a build out demand summary as of 2018; and options and a plan to expand the service area.

BOARD ACTION ITEMS FOR STAFF 1:40:54

- a. Staff is to respond to correspondence from a customer regarding a business meter hookup price increase.

COMMENTS FROM THE PUBLIC 1:41:08

There was no public comment.

EXECUTIVE SESSION 1:42:06

The regular meeting recessed at 12:42 PM to go into executive session for approximately 20 minutes to discuss litigation or potential litigation with legal counsel, pursuant to RCW 42.30.110(1)(i). Those in attendance were: Commissioners Purser, Paschall, and Waddell; Attorney David Worley; General Manager Sean Worthington; and Human Resources Manager Jamie Spence. No action is expected.

The executive session adjourned at 1:05 PM and the regular meeting reconvened at that time.

ADJOURN

There being no further business to come before the board, the meeting adjourned at 1:05 PM.

ATTEST:

President

Vice President

Secretary

A detailed transcript of this meeting via audio recording is available to the public on the Commission Meetings page of the PUD website here: <https://clallampud.net/commission-meetings/>.

June 30, 2022

SUMMARY VOUCHER APPROVAL
PUBLIC UTILITY DISTRICT #1 OF CLALLAM COUNTY
OPERATING FUND

We certify, under penalty of perjury, that the materials have been furnished, the services rendered, or the labor performed as described herein, and that the attached list of claims are a just, due and unpaid obligation against Public Utility District No. 1 of Clallam County, and that we are authorized to authenticate and certify said claims.

SIGNED  DATE 7/6/22
AUDITING OFFICER

 DATE 7/6/22
GENERAL MANAGER

Vouchers audited and certified by the Auditing Officer and the General Manager have been recorded on the attached list(s) which has been made available to the Board of Commissioners of Public Utility District No. 1 of Clallam County. We, the undersigned Board of Commissioners of Public Utility District No. 1 of Clallam County, approve for payment those vouchers included on the attached list(s):

Summary for Voucher Lists Dated 6/27/2022–7/5/2022

Checks	\$	745,995.18
Wire Transfers		223,532.20
E-Payment		28,809.72
Prepays		98,746.42
Total	\$	1,097,083.52

COMMISSIONER

COMMISSIONER

COMMISSIONER

PUD#1 OF CLALLAM COUNTY, WASHINGTON

JULY 2022

**DELINQUENT ACCOUNTS TO BE REMOVED
FROM ACTIVE ACCOUNTS RECEIVABLE**

Delinquent accounts listed for electricity and water on the attached pages are approved to be removed from the active accounts receivable. All accounts to be removed are grouped and total as follows:

07/05/22	Clallam Bay – Evergreen	\$	234.80
07/05/22	Forks – Evergreen	\$	1,200.38
07/05/22	Port Angeles – Evergreen	\$	4,558.38
07/05/22	Sequim – Evergreen	\$	8,116.27
07/05/22	All Area-Direct W/O Bankruptcy	\$	-
07/05/22	All Area-Direct W/O Deceased	\$	125.96
07/05/22	All Area-Direct W/O Small Balance	\$	-
	SUBTOTAL	\$	<u>14,235.79</u>
07/05/22	30% Collection Fee	\$	4,232.96
	TOTAL	\$	<u><u>18,468.75</u></u>
	Previous Debt Collected in June 2022	\$	717.71
	Previous Debt Collected Year To Date 2022	\$	8,033.70

Dated this _____ day of _____, 20_____.

President

Secretary

Vice-President

SW:kw

Attachments

These lists comply with our CIS software which removes accounts from the active accounts receivable when placed with a collection agency (classifies them as bad debt). The exceptions are bankruptcies, deceased customers and customer accounts with small balances under \$20. These are removed under the categories of All-Area Direct W/O, but not placed with a collection agency.

A RESOLUTION Appointing the
District's Public Records Officer

WHEREAS, Chapter 42.56, Section 580 of the Revised Code of Washington requires that all state and local government agencies appoint and publicly identify a public records officer whose responsibility is to serve as a point of contact for members of the public in requesting disclosure of public records and to oversee the agency's compliance with the public records disclosure requirements; and

WHEREAS, it has been determined that the appropriate party to be the public records officer for Public Utility District No. 1 of Clallam County (District) is the Communications and Government Relations Manager; now, therefore, be it

RESOLVED, That pursuant to RCW 42.56.580, the Communications and Government Relations Manager is designated as the public records officer for the District.

2. That the person to whom members of the public may direct requests for disclosure of public records of the District and who will oversee the District's compliance with the public records disclosure requirement of the public disclosure laws of the State of Washington is:

Nicole Hartman, Communications and Government Relations Manager
PUD No. 1 of Clallam County
P.O. Box 1000
Carlsborg, WA 98324

3. Notice of the designation of the District's public records officer shall be made in a manner reasonably calculated to provide notice to the public of such designation, said notice to include, but not be limited to, the following: posting at District offices, and posting on the District's website.

PASSED, by the Board of Commissioners of Public Utility District No. 1 of Clallam County,
Washington, this 11th day of July 2022.

President

ATTEST:

Vice President

Secretary

2023 STRATEGIC PLAN

NOTE: HIGHLIGHTED content in this plan indicates either content that is NEW or SIGNIFICANTLY REVISED from the 2022 plan.



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We are proud to present to you PUD #1 of Clallam County's 2023 Strategic Plan.

The 2023 Strategic Plan continues the expectation of excellence established in prior years. The Plan includes the District's focus on broadly defined areas described as **Strategic Objectives**, with a definition and **"Picture of Excellence"** for each objective. Gaps to reaching Excellence are identified and **Strategic Initiatives** were developed to close these gaps and help us achieve the Picture of Excellence. Along the way, we track performance through the use of **Key Performance Indicators**. Minor updates are performed annually, with a "deep dive" into the Plan every 3 to 5 years.

As always, our **Mission** remains the foundation for our Strategic Objectives – **"Providing reliable, efficient, safe, and low cost utility services in a financially and environmentally responsible manner."** This, along with our **Core Values**, will help us continue to be what our **Vision** states in **"Being the best utility for OUR customers."**

We welcome feedback and suggestions for future updates to our Strategic Plan.

Thank you,



Sean Worthington
General Manager

Leadership is having a compelling vision, a comprehensive plan, relentless implementation, and talented people working together.
~ Alan Mulally

ABOUT CLALLAM PUD



In 1940 the people of Clallam County were presented with the opportunity to vote on formation of a Public Utility District. The language presented on the ballot for the purpose stated: ***“to conserve water and power resources and to supply public utility service, including water and electricity, for all uses.”*** PUDs are unique in our nation, as they are not-for-profit, and are owned by the customers served. Since 1940, Clallam PUD has developed three more utilities: water, sewer, and then in 2000 broadband, after the Legislature authorized PUDs to go into the wholesale telecommunications business.

Today our PUD serves over 28,000 accounts with electric service, and over 4,500 with water connections. We have offices in Forks, Clallam Bay/Sekiu, as well as a main office in Carlsborg that provide one-stop shopping for customers and high efficiency for employees.

We also help our customers save money with rebates, incentives and lower power bills associated with conservation and implementation of renewable distributed generation. Our PUD is fortunate to have access to renewable hydroelectric power for the bulk of our power needs.

On average, we are over 95% carbon-free.

CORE VALUES – R.E.S.P.E.C.T.

RESPECTFUL We guide all our actions with respect for each other, our customers and ourselves.

ETHICAL Integrity and honesty form the foundation of all our actions.

SAFE Safety is at the center of the PUD’s mission.

PROACTIVE Proactive, positive thinking and action are essential to our success.

EXCELLENT We use the standard of excellence to judge our work.

CUSTOMER FOCUSED We are committed to providing friendly, professional customer service.

TEAM ORIENTED We value the importance of teamwork to satisfy both our customers and ourselves.



ACHIEVEMENTS

- GFOA Certificate of Achievement for Excellence in Financial Reporting – Annual Comprehensive Financial Report for Year Ending December 31, 2020*
- WPTA Certification of Excellence – Investment Policy
- APPA Reliable Public Power Provider 2020-2023*
- APPA Smart Energy Provider 2020-2022*

*The District has re-applied for these designations for the next period.

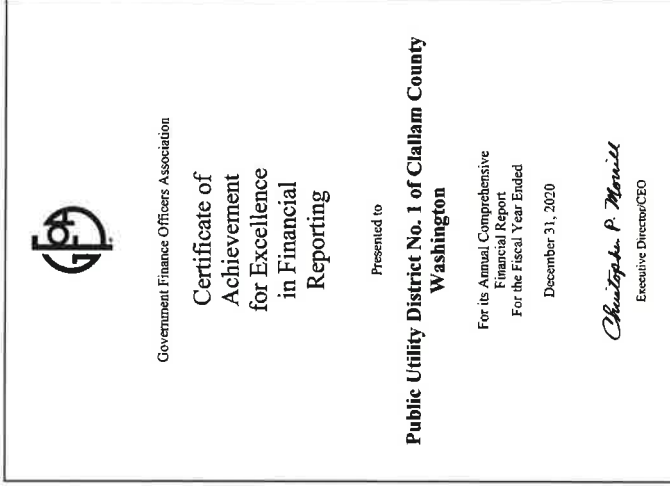


American Public Power Association

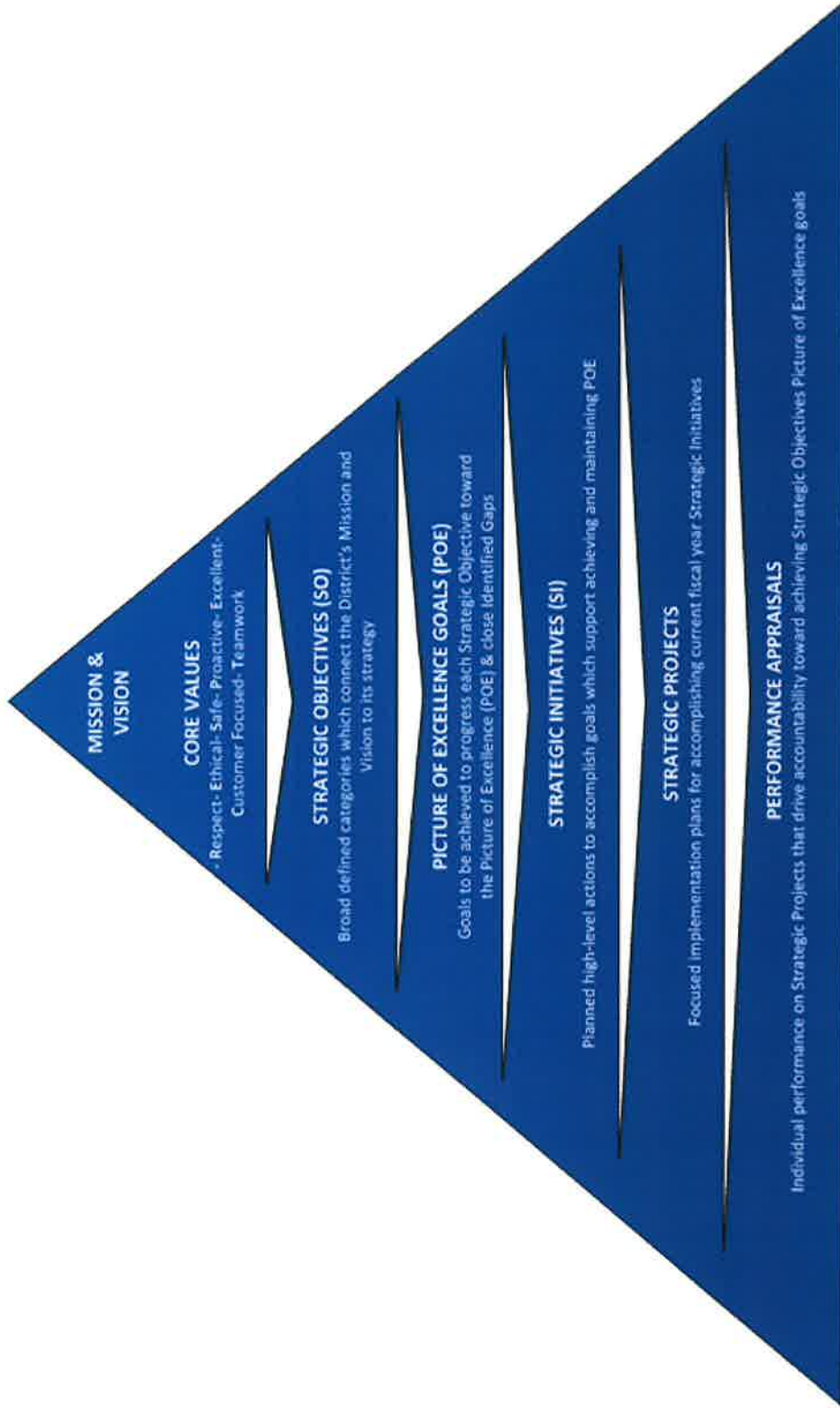


**SMART
ENERGY
PROVIDER**

American Public Power Association



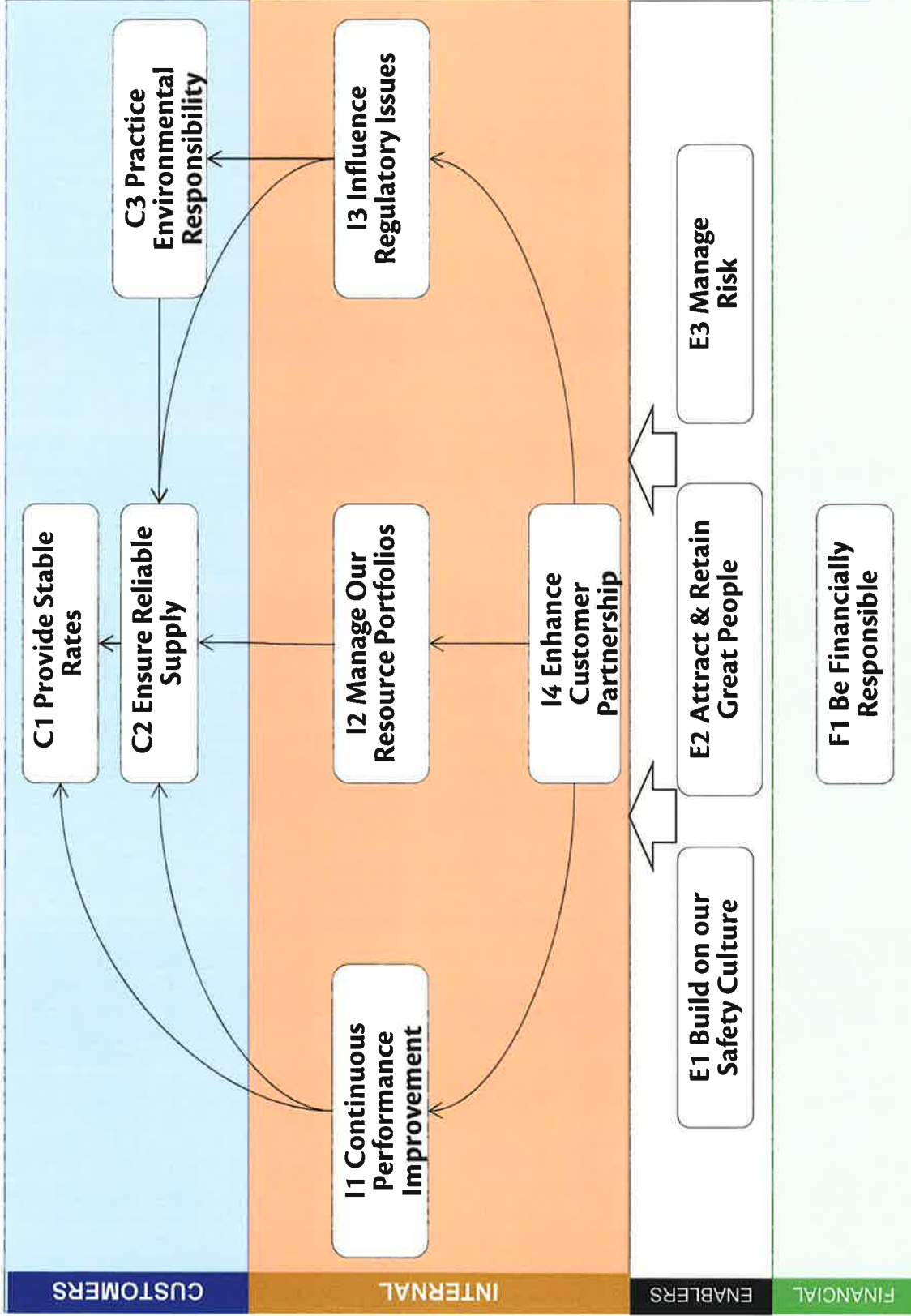
Clallam County PUD #1 Strategy Pyramid



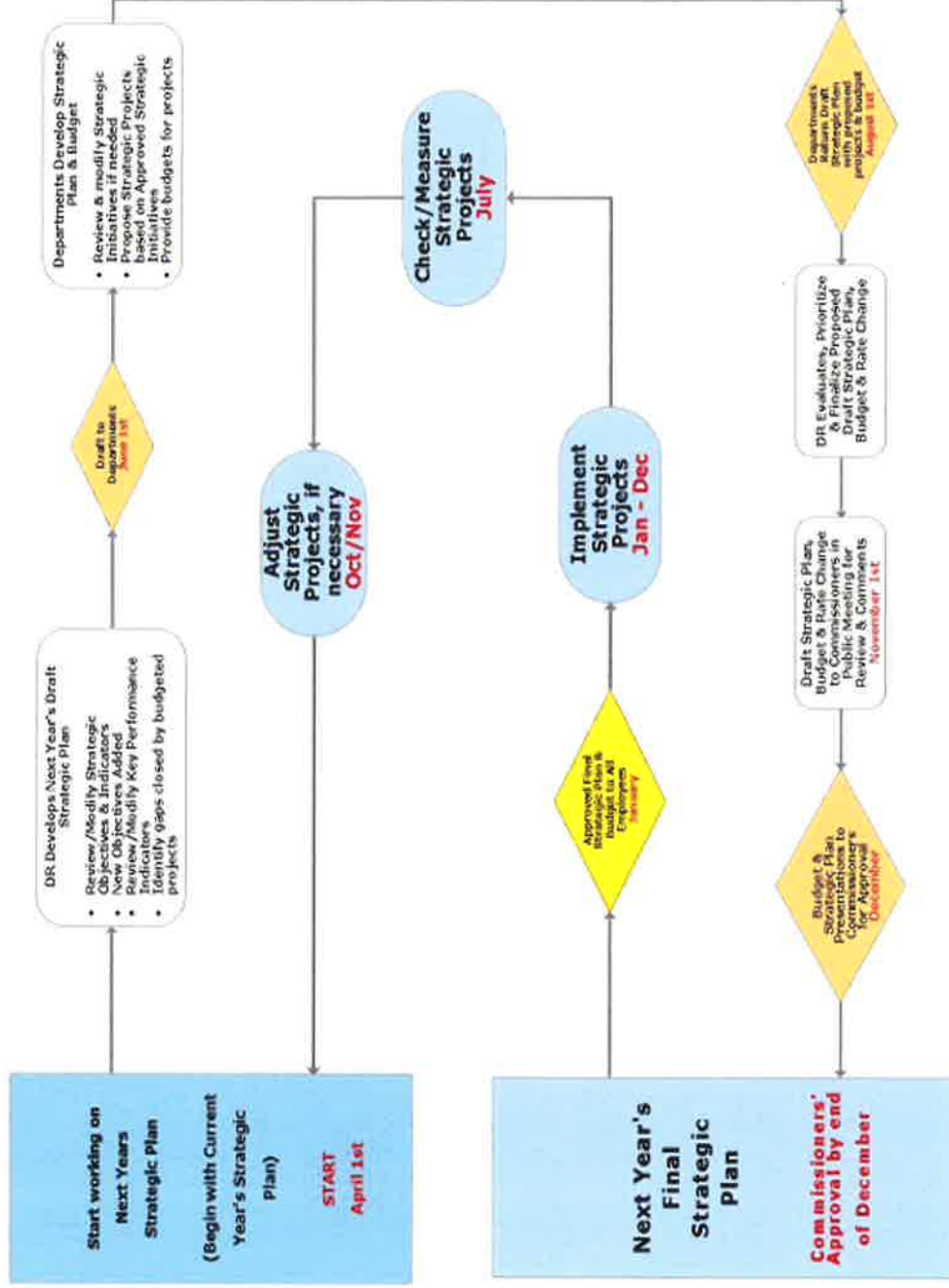
STRATEGIC OBJECTIVES (SO)

- CUSTOMER:** Provide Stable Rates; Ensure Reliable Supply; Practice Environmental Responsibility
- INTERNAL:** Continuous Performance Improvement; Manage Our Resource Portfolios; Enhance Customer Partnerships; Influence Regulatory Issues
- ENABLERS:** Build on our Safety Culture; Attract & Retain Great People; Manage Risk
- FINANCIAL:** Be Financially Responsible

STRATEGIC OBJECTIVES



STRATEGIC PLAN PROCESS



DEFINITIONS

- Picture of Excellence (POE): The perfect picture; where we would like to be.
- Identified Big Gaps to POE: The identified challenges to reaching the POE.
- Strategic Initiatives: Initiatives that will bridge the Big Gaps, to reach the POE.
- Key Performance Indicators (KPI): The measurables that allow us to assess progress towards the POE.

ACRONYMS

- AMI: Advanced Metering Infrastructure
- APPA: American Public Power Association
- AWWA: American Water Works Association
- BPA: Bonneville Power Administration
- CEIP: Clean Energy Implementation Plan
- CETA: Clean Energy Transformation Act
- DOE: Department of Energy
- DOH: Department of Health
- EIA: Energy Independence Act
- ERRP: Emergency Response & Restoration Plan
- GFOA: Government Finance Officers Association
- GIS: Geographic Information System
- NES: National Electric Safety Code
- NWPPA: Northwest Public Power Association
- NWRP: Northwest RiverPartners
- OMS: Outage Management System
- OSHA: Occupational Safety & Health Administration
- PPC: Public Power Council
- PURMS: Public Utility Risk Management Services
- RP3: Reliable Public Power Provider
- SCADA: Supervisory Control & Data Acquisition
- SEP: Smart Energy Provider
- WPAG: Washington Public Agencies Group
- WAC: Washington Administrative Code
- WPTA: Washington Public Treasurers' Association
- WPUDA: Washington Public Utility District Association

STRATEGIC OBJECTIVE: PROVIDE STABLE RATES

Direct Report Lead

Ruth Kuch, Finance Manager/Treasurer

Definition

Levelize rate increases responsive to inflation to provide rate stability for District customers.

Picture of Excellence (POE)

Customers experience stable rates with no more than a 2% rate adjustment over the previous 5-year average rate adjustment. Over 10 years, replacement capital costs are within 15% of depreciation.

Identified Big Gaps To POE

- Cost pressures (BPA and conservation) require efficiency measures be identified and implemented to control other costs.
- Environmental and other regulatory as the Energy Independence Act (EIA) & Clean Energy Transformation Act (CETA) upward rate pressures.
- Volatile KWH sales and decreasing system load factor due to conservation and distributed generation.
- Aging infrastructure requires capital improvements and replacement.
- Weather effects on water and power usage affecting cost recovery.
- Alignment of personnel and succession to meet obligations.
- Volatile supply chain issues and inflation.

Strategic Initiatives

- Maintain and use the 10-year projection model to forecast rates, personnel, capital and financing needs.
- Conduct regular Cost of Service studies and implement appropriate rate structures.
- Active participation in WPAG, WPUDA, and other industry associations.
- Maintain modeling and tracking of monthly rate revenues.
- Managers track budgets monthly in order to actively manage costs.
- Review of budgets quarterly with managers and supervisors.
- Plan, design, and implement engineering projects and technology to reduce future O&M and energy procurement costs, while enhancing system efficiency.
- Maintain targeted cash reserves to address pandemic, unusual weather events, disasters, inflation, and other unforeseen events.
- Review and maintain Restricted Capital Account to proactively plan for CETA compliance.
- Active participation in BPA Provider of Choice contract negotiations.

Key Performance Indicators (KPI)

Electric

Revenues/expenses within % of budget (weather adjusted)

- **Green** = Within 5% of budget
- **Yellow** = Within 5 to 8% of budget
- **Red** = >8% of budget

Electric Rate Increases

- **Green** = Within 0-1 % of 5 year average
- **Yellow** = Within 1-2% of 5 year average
- **Red** = 2+% of 5 year average

Water

Revenues/expenses within % of budget

- **Green** = Within 5% of budget
- **Yellow** = within 5% to 8% of budget
- **Red** = >8% of budget

Electric and Water

- **Green** = Capital +/- 15% of Depreciation
- **Yellow** = Capital +/- 20% of Depreciation
- **Red** = Capital > +/- 20% of Depreciation

STRATEGIC OBJECTIVE: ENSURE RELIABLE SUPPLY

Direct Report Leads

John Purvis, Assistant General Manager
Tom Martin, Water/WW Systems Manager
Shawn Delplain, Broadband Supervisor

Definition

Provide dependable and high-quality products and services to our customers.

Picture of Excellence (POE)

Customers provided with on demand and continuous electric, water, and communications service. Outages are kept to a minimum. Emergency events incorporate lessons learned and follow up. Proven and secure technologies provided for electric and water systems. (SCADA, GIS, AMI) Drinking water regulations are met at lowest cost. Successfully adapt to consequences of climate change.

Identified Big Gaps To POE

- Aging infrastructure has negative impact on system reliability.
- Inadequate system looping /redundancy.
- Technologies not fully deployed (AMI, broadband, connectivity, GIS, SCADA).
- Excessive outage duration and frequency.
- Optimize system operations through technological innovation.
- Broadband expansion not financially viable without rate payer subsidy or substantial grant funding.
- BPA transmission outages.
- Infrastructure enhancements required to adapt to climate change.

Strategic Initiatives

Electric

- Conduct comprehensive planning study, every three years with 10-year horizon, with annual review, and effective implementation of associated projects.
- Track cable faults and effectively implement cable replacement projects.
- Develop and implement AMI-, SCADA-, GIS- and OMS-based applications and tools.
- Complete substation modernization and SCADA.
- Plan, design and implement engineering projects to meet future requirements and contingencies
- Plan, design and implement engineering projects and technology to improve system reliability by quantifiable reduction in System Average Interruption Duration Index (SAIDI).
- Procure quality products/service from reputable vendors at a competitive price to ensure availability and timely delivery that will benefit the District and our customers.
- Ensure product is readily available when needed by crews during outages and emergency situations.
- Maintain established vegetation cycles, and management plan.
- Conduct annual ERRP assessment, lessons learned, and conduct ERRP exercises/drills.

Telecommunications

- Develop a 5 year capital plan.
- Comply with Federal and State mandates for broadband network components.
- Encourage, support, and work with local Internet Service Providers (ISPs).
- Develop staff network proficiency and availability.
- Expand broadband for District services with ancillary benefit for underserved and unserved communities

Water

- Study effective management of outages and make recommendations for improvement.
- Plan, design, and implement engineering projects to replace failing infrastructure.
- Implement SCADA for Panoramc Heights water system
- Implement GIS and asset management system for all water systems.
- Implement a Preventative Maintenance Program.
- Develop looping and redundancy policy and plan.
- Development emergency backup system plan for all pump stations.
- Conduct feasibility studies for climate change resiliency.
- Procure a water truck for drought mitigation.

STRATEGIC OBJECTIVE

ENSURE RELIABLE SUPPLY ...continued

Direct Report Leads

John Purvis, Assistant General Manager
 Tom Martin, Water/WW Systems Manager
 Shawn Delplain, Broadband Supervisor

Key Performance Indicators (KPI)

Electric (Rolling Annual)

- Green = SAIDI < 180
- Yellow = SAIDI = 180 - 250
- Red = SAIDI > 250

Electric (3 Year Cycle)

- Green = > 95% on RP3 score
- Yellow = > 80% on RP3 score
- Red = < 80% on RP3 score

Water: Outages due to Aging Infrastructure

- Green = 0-1 per quarter
- Yellow = 2-3 per quarter
- Red = > 3 per quarter

Water: Operating Permit Status

- Green = Green status
- Yellow = Blue status
- Red = Yellow status

Telecom: District System Availability

- Green = > 99.999%
- Yellow = 99 - 99.999%
- Red = < 99%



STRATEGIC OBJECTIVE: PRACTICE ENVIRONMENTAL RESPONSIBILITY

Direct Report Leads

John Purvis, Assistant General Manager
Tom Martin, Water/WW Systems Manager

Definition

Meeting regulatory requirements while recognizing our compliance actions have short and long-term impacts on the environment as well as financial burdens to our customers.

Picture of Excellence (POE)

Meets or exceeds all environmental regulations in a financially responsible manner by implementing cost effective, proven technologies and initiatives to support conservation and environmental responsibility.

Identified Big Gaps To POE

- Protect existing water rights and procure or mitigate for sufficient new water rights to satisfy DOE & DOH mandates.
- Adequate first responder and backup training for oil spills and other environmental emergencies.
- Uncertain path to resource adequate carbon free power supply.
- Identify long-term disposal/storage of environmental obligations.
- Not geographically situated to take competitive advantage of large-scale renewable resources.
- Low interest in community solar due to low financial return.
- Unknowns: compliance costs and effectiveness of conservation rates.
- Underdeveloped relationships with local environmental stakeholders and groups.

Strategic Initiatives

- Assess how regulatory compliance and changes will affect us and our customers.
- Introduce and evaluate fleet electric vehicles.
- Document all environmental regulations, procedures and reporting requirements.
- Procure, recycle, and dispose of equipment and materials in an environmentally safe manner.
- Engineer projects adhering to all local, state and federal environmental requirements and regulations.
- Comply and conform to all local, state, and federal environmental related directives.
- Coordinate with project partners to conduct necessary SEPA and cultural resource review after preliminary engineering task.
- Complete first responder and backup training for oil spills.
- Develop relationships and improve communications/collaboration with environmental stakeholders and groups.
- Incorporate climate-change and environmental impacts in project cost analysis.

Electric:

- Develop and maintain a Clean Energy Implementation Plan (to reduce CO2 emissions)
- Plan and develop sustainable EV charging infrastructure.
- Conduct annual oil spill, Polychlorinated Biphenyls (PCB) and Spill Prevention, Control, and Countermeasure (SPCC) training.
- Conduct periodic site audits of District waste disposal areas and processes.
- Conduct periodic site audits of District waste disposal contractors.

Water:

- Track effectiveness/revenue impact of conservation rates.
- Track costs of compliance for water right mitigation and discharge permits.
- Identify/track climate-change related project costs.
- Evaluate water quality issues and develop low cost solutions.

Key Performance Indicators (KPI)

Electric (Power Supply Carbon Content)
 ➤ Green = Carbon Neutral
 ➤ Yellow = 0-10% Carbon
 ➤ Red = > 10% Carbon

Electric (Quarterly)

➤ Green = No violations
 ➤ Yellow = Investigation of violation
 ➤ Red = Any violation

Water (Conservation/Revenue)

Average gallons/per day, residential
 Summer (May-Sept)
 ➤ Green = 150-225
 ➤ Yellow = 225-400
 ➤ Red = <150 or >400

Winter (Oct-April)

➤ Green = 100-150
 ➤ Yellow = 150-225
 ➤ Red = <100 or >225

Water (Quarterly)

➤ Green = No violations
 ➤ Yellow = Investigation of violation
 ➤ Red = Any violation

STRATEGIC OBJECTIVE: CONTINUOUS PERFORMANCE IMPROVEMENT

Direct Report Lead
Jamie Spence, HR Manager

Definition

Continuous improvement in everything we do including: strategy, process improvement, innovation, and leveraging technological advances.

Picture of Excellence (POE)

A culture where all employees are empowered to continuously strive for new ways to improve and incorporate technology and information systems are leveraged for optimum use and performance.

Identified Big Gaps To POE

- A more direct link is needed between employee's job duties and performance with the Strategic Plan.
- Need for cost effective implementation and integration of rapidly changing industry proven technologies.
- No defined process for employees to proactively improve efficiency, productivity and innovation.
- Insufficiently effective vertical communication to fully assess/address employee suggestions.
- Inefficient or redundant processes.
- Inconsistent empowerment of employees.
- Employee survey results indicate a need for clearer communications.
- Lack of participation in employee survey.

Strategic Initiatives

- Supervisor training.
- Revamp staff appraisal and salary matrix.
- Expand, promote, and implement employee suggestion program and ad hoc evaluation committees.
- Identify and eliminate redundant processes.
- Implement proven industry technologies and applications that improve processes and productivity.
- Improve quality and accessibility of data to enhance processes and productivity.
- Utilize project and work assignments to develop staff and expand staff competencies.
- Integrate Strategic Plan initiatives and KPIs into employee goals, objectives and performance.
- Maximize functionality of our integrated NISC, AML, and Laserfiche software solutions.
- Implement payroll processes that accurately reflect activity and simplify reporting Employee Self Serve (ESS).
- Interdepartmental awareness training.

Key Performance Indicators (KPI)

% Employee Participation in Survey

- Green = >70%
- Yellow = 50-70%
- Red = <50%

RP3

- Green = >95%
- Yellow = 80-90%
- Red = <80%

SEP

- Green = >85
- Yellow = 70-85
- Red = <70



STRATEGIC OBJECTIVE: MANAGE OUR RESOURCE PORTFOLIO

Direct Report Leads

John Purvis, Assistant General Manager
Tom Martin, Water/WWW Systems Manager

Definition

Electric: A load-following BPA customer that has an optimized BPA supply that is compliant with WA State CETA as well as other regulatory requirements that meets customer needs and expectations in a manner consistent with the District's mission. **Water:** Continually optimized portfolio meeting all resource requirements.

Picture of Excellence (POE)

Maintain an optimized portfolio maximizing carbon-free power supply and water supply while meeting the District's mission. The effects of climate change are factored into all resource availability and use. Water rights are secured as soon as possible for full build out of existing retail service areas.

Identified Big Gaps To POE

- Legislative uncertainty with respect to renewable and other mandates.
- Lack of corporate knowledge / familiarity with emerging power distribution technologies.
- Need to acquire additional water rights for near term needs and full build out of water system service areas.
- Need for optimized mix of conservation and Tier 2 resource mix.
- Water losses due to aging infrastructure.
- Need conservation rate structure that encourages conservation and offsets rate impacts (ex. Time of Use (TOU) rates).
- Need to meet Clean Energy Transformation Act (CETA) requirements.
- No long term power supply contract post 2028.
- Lack of power/risk manager.

Strategic Initiatives

Electric

- Monitor CETA rulemaking, develop compliant Resource Plan (RP), CEIP and conduct associated feasibility studies.
- Acquire conservation with a program cost that is less than our avoided cost of power in keeping with stable rates.
- Implement a distribution upgrade program that optimizes energy savings and system reliability.
- Plan, design, and implement engineering projects that cost effectively reduce or optimize line losses and customer conservation
- Complete deployment of AMI.
- Monitor and review CETA compliant power supply technologies.
- Active participation in WPAG, WPUA and PPC to ensure procurement of a cost competitive power supply.
- Long term full service power acquisitions made at most competitive regional rates.
- Mitigate rate pressure through consistent and innovative enhancements in productivity.
- Engage in BPA Provider of Choice 2028 contract negotiations and coordinate with associations to ensure District concerns are addressed.
- Implement time of use rate and demand response pilot projects based on power procurement cost offset.

Water

- Identify strategies to secure water rights for full buildout.
- Develop in-kind and out-of-kind mitigation projects in collaboration with local stakeholders.
- Look at each water system independently to determine what level of conservation is needed.
- Replace aging infrastructure based on cost/benefit.
- Continually optimized portfolio meeting all resource requirements at the lowest cost.
- Develop strategies for meeting full buildout demand for each water system.
- Identify strategies for groundwater storage in the Dungeness basin.
- Maintain all water sources in active compliance.

STRATEGIC OBJECTIVE: MANAGE OUR RESOURCE PORTFOLIO

Direct Report Leads

John Purvis, Assistant General Manager
Tom Martin, Water/WW Systems Manager

Key Performance Indicators (KPI)

Conservation

- **Green** = Conservation < Tier 2 costs
- **Yellow** = Conservation 100-110% Tier 2 costs
- **Red** = Conservation > 110% Tier 2 costs

Electric System Losses

- **Green** = <5%
- **Yellow** = 5.0-5.5%
- **Red** = >5.5%

Water (per system)

Distribution system loss rates are within DOH Water Use Efficiency Standards.

- **Green** = all standards below 10% loss rate
- **Yellow** = all standards between 10% - 15% loss rate
- **Red** = all standards greater than 15% loss rate

Ratio of water right supply to full buildout demand

- **Green** = > = 100%
- **Yellow** = 80-100%
- **Red** = <80%



STRATEGIC OBJECTIVE: INFLUENCE REGULATORY ISSUES

Direct Report Lead

Nicole Hartman, Communications & Government Relations Manager

Definition

Understanding regulatory and policy issues that affect the District helps us to educate customers and elected officials about the impact of proposed or final legislation which allows us to anticipate and manage our costs and practices.

Picture of Excellence (POE)

The District alone and with affiliated appropriate organizations influences regulatory issues, and protects PUDs from disadvantageous legislation and is successful in implementing legislation that is the interest of our customers. The District receives issue analysis from affiliated organizations and communicates to customers and employees the legislative issues facing PUDs.

Identified Big Gaps To POE

- Minimal influence with state and federal legislators – need for understanding of impact to utilities/ratepayers.
- Lack of customer and employee awareness of the impact of regulatory requirements, new legislation, and initiatives.
- Uncertainty in identifying cost and funding requirements of existing and proposed legislation or initiatives.

Strategic Initiatives

- Work with legislators, stakeholders, and affiliated committees and organizations to support and implement reasonable water, telecom, and electric legislative changes and/or to restrict legislation impacting customers negatively.
- Promote the benefits of Public Power and Local Control at all levels of government.
- Monitor and respond to requests for comment on proposed regulatory, legislative, case law, and code changes.
- Educate policymakers, customers, and employees describing issues and impacts
- Effective staff representation at external meetings.
- Communication conveyed to internal stakeholders about information learned at meetings attended.
- Work with funding agencies and elected officials to develop their budgets to make the necessary funds available.

Key Performance Indicators (KPI)

Clallam PUD representation at affiliated regulatory organizations and committees

- Green = >85%
- Yellow = 60-85%
- Red = <60%

Relevant monthly print or digital

- Green = 100%
- Yellow = 75%
- Red = <75%



STRATEGIC OBJECTIVE: ENHANCE CUSTOMER PARTNERSHIPS

Direct Report Lead

Nicole Hartman, Communications &
Government Relations Manager

Definition

Two-way communication develops awareness, knowledge, understanding, acceptance and participation in the District by customers. By engaging customers and community partners we facilitate improvement, build ownership, support local control, and manage costs.

Picture of Excellence (POE)

Our customers are well informed about District resources, services, public power structure and benefits, and are strong advocates for the District and public utilities. Customers trust the District is a subject-matter expert.

Identified Big Gaps To POE

- Decreasing awareness of the benefits of public power.
- Need for further education to both customers and employees on key issues and understanding the District's business.
- Inconsistent outbound communications undermine customer confidence.
- Measuring District participation in local committees and organizations.
- Lack of awareness in the community of the District as a resource and partner.
- Need to enhance customer experience by eliminating bottlenecks and sources of frustration.

Strategic Initiatives

- Educate employees on public power, District operations, key issues and the District's Mission, Vision and Strategic Plan.
- Hold GM/senior staff small group meetings and/or annual meetings with employees.
- Commissioner outreach to constituents (i.e. commission meetings in all three Commissioner districts, casual meetings, Public Power Week, etc.)
- Track customer engagement through website and social media trends.
- Provide ample early notification to customers on new, or changes to, products and services.
- Integrate comprehensive customer survey feedback into the strategic plan and projects every 3-5 years.
- Informal surveys to increase customer engagement.
- Enhance partnerships with the community, contractors, organizations, and local governments.
- Engage with customers through community events, seminars, and volunteer activities.
- Continue to utilize educational content/infographics provided by APPA, AWWA, BPA, NWRP, NWPPA, and WPUA.
- Continually evaluate digital tools to enhance customer access and ease of doing business.

Key Performance Indicators (KPI)

Indicator = Website users vs. last 30 days

- Green = > 5,000
- Yellow = 3,500-5,000
- Red = < 3,500

Indicator = Facebook page engagement

- Green = > 20% likes to customers ratio
- Yellow = 10-20% likes to customers ratio
- Red = < 10% likes to customers ratio

Community Outreach/Events

- Green = > 12 per year
- Yellow = 8-12 per year
- Red = < 8

Water (Stakeholder Engagement)

- Green = Quarterly
- Yellow = Semi-annual
- Red = Annual

STRATEGIC OBJECTIVE:

BUILD ON OUR SAFETY CULTURE

Direct Report Lead

Larry Morris, Safety Manager

Definition

A safety-first culture supports employee and public safety, and aids in preventing injuries, casualties, and property damage which mitigates risk to the District and public.

Picture of Excellence (POE)

Safety is fully incorporated into the work culture; such that all employees continually recognize personal and public safety as the primary concern in all work related activities. District maintains compliance with all federal and state safety regulations and recognized industry best practices. District recognized for its safety program (awards).

Identified Big Gaps To POE

- Need to address and reduce most common causes of injuries.
- Need to reduce recordable injuries and reduce vehicle and property damage.
- Unsure if PPE being uniformly utilized.
- Safety committee lacks structure and authority.
- Safety Recognition Program not fully applied.
- L&I experience factor higher than industry standard.
- Emergency supply procurement not completed.
- Lack of accountability when safety-related injuries/damages incurred.

Strategic Initiatives

- Provide District-wide employee education on the impact and cost of L&I experience factor.
- Identify categorize light-duty opportunities District-wide.
- In-house L&I accident investigation training.
- Ensure documentation of accident/ injury investigation are complete.
- Explore new avenues for safety education and training for customers, contractors and employees.
- Complete monthly field safety audits.
- Recognize work groups that are 1- year accident free.
- Utilize existing Performance in Excellence for safety recognition.
- Ensure personnel are provided and utilize quality reliable and up-to-date Personal Protection Equipment and safety supplies.
- All personnel maintain a clean and hazard-free work space and environment.
- Comply with all applicable NESC, WAC, and OSHA safety requirements.
- Restructure safety committee team and authority to enable decision making.
- Complete procurement of ERPP supplies.
- Develop a hazard mitigation plan for each department.

Key Performance Indicators (KPI)

Loss Time Injuries reported per quarter (LTI)

- Green = < 1
- Yellow = < 2- 3
- Red = 4 or more

Accidents/injuries/damages investigation completed

- Green = 100% within 4 working days
- Yellow = 100% within 8 working days
- Red = >8 working days

Recognition of departments with 1-year accident free

- Green = annually
- Yellow = biannually
- Red = >biannually

L&I experience factor

- Green = <1
- Yellow = 1-1.15
- Red = >1.15

Quarterly field employees safety audits

- Green = >3
- Yellow = 2-3
- Red = <2

STRATEGIC OBJECTIVE: ATTRACT AND RETAIN GREAT PEOPLE

Direct Report Lead

Jamie Spence, HR Manager

Definition

Providing competitive compensation, benefits, development, and promotion opportunities in a healthy and secure work environment. The District recognizes people are critical to our success and helps maintain a proficient and stable workforce.

Picture of Excellence (POE)

The District is a premiere employer with outstanding employees. The District attracts and retains great employees that are highly skilled and provide exceptional service as ambassadors to the District.

Identified Big Gaps to POE

- Objective performance criteria and assessment not well defined/consistently applied for all employees.
- Do not have a way to regularly engage employees.
- Difficulty recruiting relevantly-skilled individuals for all positions on the Olympic Peninsula.
- Applicant process needs to be updated/streamlined.
- Domino effect when backfilling positions impacts departments.
- Inaccurate performance appraisals.
- Staff employee compensation based on performance, position longevity, market, and promotions is not fully objective.
- Misalignment between evolving employee expectations and the District's core values.
- Lack of engagement/awareness between managers/supervisors and their employees.

Strategic Initiatives

- Survey supervisors/managers to identify needed training and provide that training in-house if possible.
- Update Employee Handbook on a biannual basis.
- Promote and encourage employee growth and advancement through available relevant and applicable training.
- Complete comprehensive outside compensation and benefits analysis every two years.
- Conduct monthly small group meetings with general manager, and all employee meeting every two years.
- Provide annual anti-harassment training.
- Provide Benefit Fair to employees biannually.
- Cross train employees where applicable.
- Identify key positions and plan for attrition/succession.
- Provide a competitive total compensation and benefit package to comparable utilities.
- Work through labor management to reduce the time to fill represented positions.
- Refine objective performance and assessment criteria for represented employees.
- Ensure staff performance appraisals are completed on time.
- Develop a pay for performance appraisal defined comp ratio component in the staff salary program.
- Develop an employee engagement committee.
- Conduct annual employee survey and incorporate feedback.
- Assure employees understand strategic plan and its benefits.
- Develop non-monetary benefits.
- Implement NeoGov applicant tracking software.
- Host quarterly empowering video screenings to help inspire employees to become ambassadors.

Key Performance Indicators (KPI)

Performance appraisals turned in on time

- Green = 100% on time
- Yellow = 100% within first pay period
- Red = > 30 days

Non-retirement attrition last 12 months

- Green = Turnover rate <5%
- Yellow = Turnover rate 5%-10%
- Red = Turnover rate is >10%

HR training/meetings attendance %

- Green = > 95%
- Yellow = > 85%
- Red = < 85%

RP3 Score

- Green = > 95%
- Yellow = 80-95%
- Red = < 80%

Monthly employee recognition

- Green = 3
- Yellow = 1-2
- Red = 0

STRATEGIC OBJECTIVE: MANAGE RISK - INTERNAL

Direct Report Lead

John Purvis, Assistant General Manager

Lori Carter, Controller/Auditing Officer

Definition

"Risk" is exposure to the possibility of loss or other adverse effects on the District's objectives. "Risk management" is the process of identifying, analyzing, planning for, and monitoring risk.

Picture of Excellence (POE)

The District adheres to a formal risk-management program that identifies and analyzes risk to the District's strategic objectives to control or minimize loss or other adverse results.

Identified Big Gaps To POE

- a. No comprehensive risk management program in place.
- b. Insufficient risk analysis in developing and prioritizing strategic projects.
- c. No comprehensive physical security policy.
- d. Lack of manager/supervisor training in following procurement regulations.
- e. Lack of documented backup plan in place to address critical staff functions.

Strategic Initiatives

1. Develop, implement a formal risk management program and conduct employee training.
2. Annual tabletop exercise on Emergency Response and Restoration Plan (ERRP).
3. Conduct annual review of, and training on, contract and procurement procedures.
4. Conduct annual anti-harassment and cyber-security training.
5. Incorporate risk cost avoidance in CIP and strategic project financial analysis.
6. Conduct annual departmental risk assessments, including regular spot-control audits and review/update of internal controls as needed.
7. Complete and implement a comprehensive physical security policy.
8. Develop standard desktop procedures and cross train employees on critical functions.

Key Performance Indicators (KPI)

On track with active strategic projects

➤ Green = > 90%

➤ Yellow = 75% to 90%

➤ Red = > 75%

AEGIS topic ratings

➤ Green = All satisfactory

➤ Yellow = 1-2 needs improvement

➤ Red = 3 or more needs improvement

STRATEGIC OBJECTIVE: MANAGE RISK – External

Direct Report Lead

John Purvis, Assistant General Manager
Lori Carter, Controller/Auditing Officer

Definition

“Risk” is exposure to the possibility of loss or other adverse effects on the District’s objectives. “Risk management” is the process of identifying, analyzing, planning for, and monitoring risk.

Picture of Excellence (POE)

The District consults with outside agencies and subject matter experts to identify and mitigate external risks.

Identified Big Gaps To POE

- Emergent external risks may not yet have been identified/analyzed.
- Not meeting requirements of insurance underwriter.
- Outdated service area and franchise agreements.
- Unplanned budgetary impacts due to new regulations, economic uncertainties, and inflationary pressure, are increasing cost of operation and project completion times.
- Critical supply chain issues resulting in significant project cost increases, delays, and inability to perform our mission.

Strategic Initiatives

- Prepare for upcoming CETA rules/legislative requirements.
- Continue to prepare and mitigate risk of major wildfires and natural disasters.
- Continue to evaluate and prepare for mass adaptation of EVs on District’s electric system.
- Incorporate pandemic lessons learned into ERRP.
- Prepare to mitigate and recover from a major breach or ransomware impacting the computer system.
- Implement a multi-factor authentication solution to meet the cyber-security insurance (PURMS) requirements.
- Negotiate with Sequim, Forks, Port Angeles and Clallam County to renew and maintain service area and franchise agreements.

Key Performance Indicators (KPI)

On track with active strategic projects

- Green = > 90%
- Yellow = 75% to 90%
- Red = > 75%

AEGIS topic ratings

- Green = All satisfactory
- Yellow = 1-2 needs improvement
- Red = 3 or more needs improvement

Claim events paid or compromised annually

- Green = < \$10K paid
- Yellow = \$10K-\$20K paid
- Red = > \$20K paid

STRATEGIC OBJECTIVE: BE FINANCIALLY RESPONSIBLE

Direct Report Lead

Ruth Kuch, Finance Manager/Treasurer

Definition

Ensure financial stewardship by delivering outcomes that demonstrate transparent, effective, and responsible management of District finances.

Picture of Excellence (POE)

Healthy, sustainable financial position supported by active management of District's budgetary plan. Maintain an Aa3 rating with Moody's Investor Services while achieving the objectives and initiatives of the Strategic Plan.

Identified Big Gaps To POE

- Economic uncertainty and inflationary pressure.
- Supply chain issue impacting cost.
- Revenue variations due to weather and pandemic.
- No integration of budget process into enterprise software systems
- Unanticipated cost from storms and disasters.
- Lack of cash forecasting model.
- Staff lack of understanding of budget process and related reporting.
- Not leveraging all available funding.
- Significant monetary obligations associated with CETA low-income mandates.

Strategic Initiatives

- Educate managers on budget development, review, and analysis.
- Streamline budget reporting process enabling managers to effectively react to budget variances.
- Evaluate and strategize utilization of iVue budget model.
- Develop cash forecasting model to help evaluate and mitigate unplanned economic impacts.
- Provide asset management training and develop an asset management plan (life cycle cost, etc.).
- Plan, design and implement projects and technology to reduce future O&M and energy procurement costs.
- Manage Low Income CETA Program to mitigate rate impacts.
- Scoping plans for utility scale qualifying CETA projects and corresponding restricted cash account.
- Implement a revised customer charge to mitigate escalating material cost.
- Continue to apply for FEMA reimbursement and other funding when available.

Key Performance Indicators (KPI)

Debt service coverage ratio

- ▲ Green = >2.0x
- ▲ Yellow = 1.25x-2x
- ▲ Red = <1.25x

Debt to asset ratio

- ▲ Green = <40%
- ▲ Yellow = 40-50%
- ▲ Red = > 50%

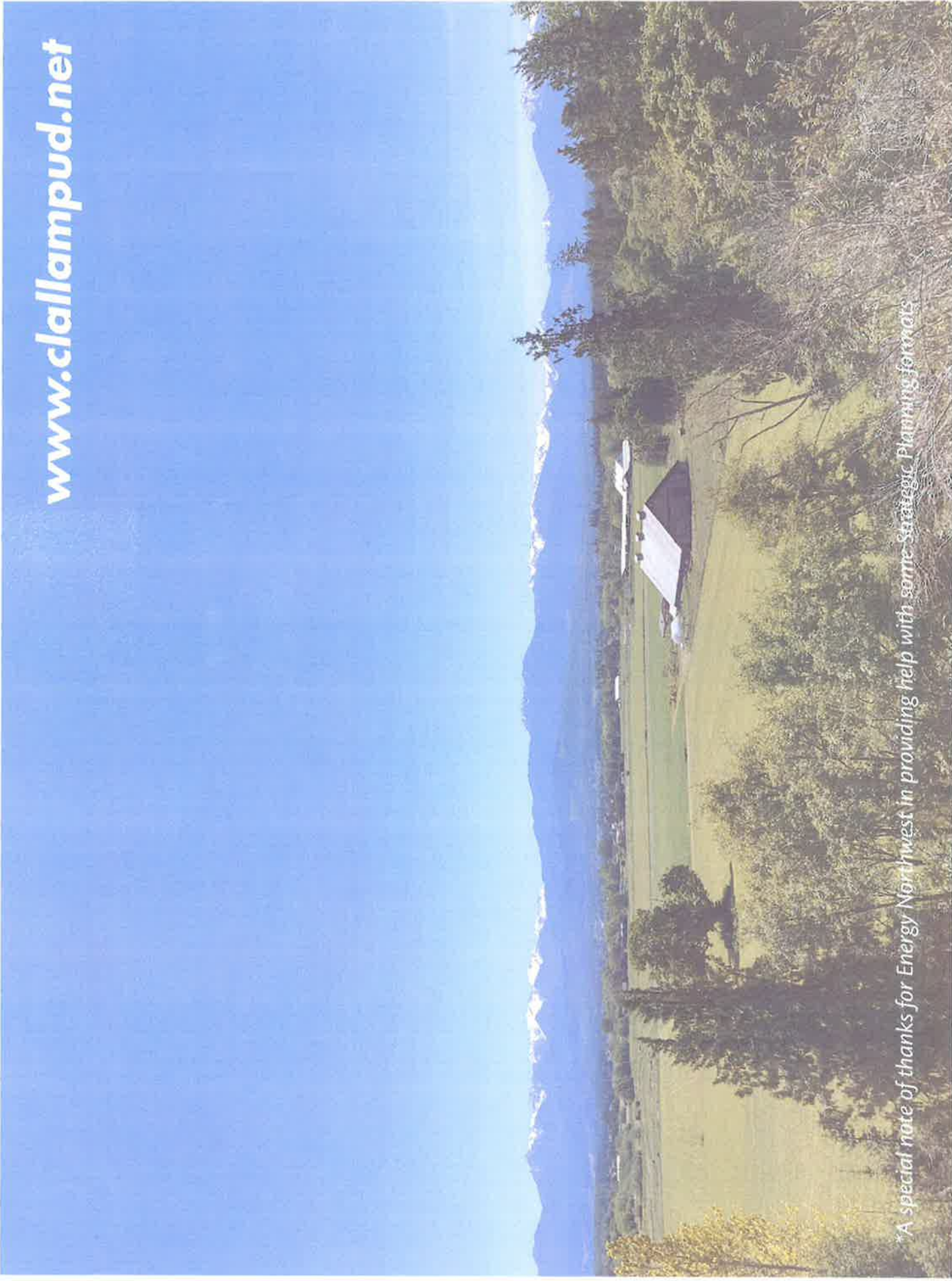
Cash reserves

- ▲ Green = 150-180 days
- ▲ Yellow = 120-150 days, 180-210 days
- ▲ Red = < 120 days or > 210 days



www.clallampud.net

**A special note of thanks for Energy Northwest in providing help with some Strategic Planning forums*



IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

IDAHO CONSERVATION LEAGUE,)
GREAT OLD BROADS FOR WILDERNESS,)
and IDAHO RIVERS UNITED,)
)
Petitioners,)
)
v.)
)
BONNEVILLE POWER ADMINISTRATION,)
)
Respondent.)
_____)

PETITION FOR REVIEW UNDER THE NORTHWEST POWER ACT

Petitioners Idaho Conservation League, Great Old Broads for Wilderness, and Idaho Rivers United respectfully petition this Court for review of the Bonneville Power Administration’s (“BPA”) decision adopting power and transmission rates for the fiscal years 2022–23 (the “BP-22 rates”). Petitioners also request review of all “preliminary, procedural, or intermediate agency action[s] or ruling[s] not directly reviewable,” 5 U.S.C. § 704, that preceded, fed into, and/or were effectively part of BPA’s decision to adopt the BP-22 rates, including (1) BPA’s adoption of its 2018–2023 Strategic Plan and (2) BPA’s integrated program review (“IPR”) for BP-22. This petition is brought pursuant to the Pacific Northwest Electric Power Planning and Conservation Act (“Northwest Power

Act”), 16 U.S.C. § 839 *et seq.*, and the Administrative Procedure Act, 5 U.S.C. §§ 701–06.

BPA adopted its BP-22 rates in a record of decision signed on July 28, 2021.¹ The Federal Energy Regulatory Commission (“FERC”) approved BPA’s rates on March 24, 2022. Petitioners timely filed a request for rehearing with FERC. On May 9, 2022, FERC notified Petitioners that their request had been constructively denied. *See* Exhibit 1. Under this Court’s caselaw, BPA’s adoption of the BP-22 rates became final when approved by FERC or, at the latest, when FERC denied rehearing. *See Golden Nw. Aluminum, Inc. v. Bonneville Power Admin.*, 501 F.3d 1037, 1042–43 (9th Cir. 2007). This petition is filed within 90 days of both dates and is thus timely under the Northwest Power Act. 16 U.S.C. § 839f(e)(5).

FERC’s review of BPA’s rates had FERC docket number EF21-3-000. Petitioners’ request for rehearing was filed under docket number EF21-3-001. The BPA rate proceeding had BPA docket number BP-22. To the best of Petitioners’ knowledge, there are no pending petitions for review of the same final decisions.

Petitioners ask this Court to set aside BPA’s final rate decision and remand the matter to the agency with instructions to set new rates in accordance with a

¹ The record of decision is available here: <https://www.bpa.gov/-/media/Aep/rates-tariff/bp-22/bp-22-final-decision/bp-22-a-02-bp-22-final-rod.pdf>

proper construction of the Northwest Power Act. Petitioners also ask for other declaratory and injunctive relief as necessary to remedy their injuries, including an order requiring BPA to provide increased funding for fish and wildlife mitigation efforts during the remand period. This relief would remedy and/or prevent ongoing and imminent harm to Petitioners. Petitioners also ask this Court to award reasonable attorney's fees and costs as allowed under the Equal Access to Justice Act, 28 U.S.C. § 2412, and any other applicable laws.

Dated: June 16, 2022

Respectfully submitted,

/s/ Andrew R. Missel

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Idaho Conservation League,
Great Old Broads for Wilderness, and
Idaho Rivers United*

RULE 26.1 DISCLOSURE STATEMENT

Petitioners Idaho Conservation League, Great Old Broads for Wilderness, and Idaho Rivers United are all non-profit organizations recognized by the IRS as Section 501(c)(3) public charities. They have no public shares and no corporate parents or affiliates with public shares.

Dated: June 16, 2022

Respectfully submitted,

/s/ Andrew R. Missel

Andrew R. Missel

Laurence (“Laird”) J. Lucas

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Idaho Rivers United

179 FERC ¶ 62,081
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Bonneville Power Administration

Docket No. EF21-3-001

NOTICE OF DENIAL OF REHEARING BY OPERATION OF LAW

(May 9, 2022)

Rehearing has been timely requested of the Commission's order issued on March 24, 2022, in this proceeding. *Bonneville Power Admin.*, 178 FERC ¶ 61,211 (2022).

In the absence of Commission action on a request for rehearing within 30 days from the date it is filed, the request for rehearing may be deemed to have been denied. 18 C.F.R. § 385.713 (2021).

Kimberly D. Bose,
Secretary.