



Platte River Power Authority

Estes Park • Fort Collins • Longmont • Loveland

December 20, 2022

BY EMAIL: CRinterimops@usbr.gov

Reclamation 2007 Interim Guidelines
SEIS Project Manager
Upper Colorado Basin Region
125 South State Street, Suite 8100
Salt Lake City, UT 84138

RE: Bureau of Reclamation's Notice of Intent to Prepare a Supplemental Environmental Impact Statement for December 2007 Record of Decision Titled Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead

Platte River Power Authority (Platte River) understands The Bureau of Reclamation (Reclamation) has issued a Notice of Intent to develop interim guidelines on how to operate and protect the Colorado River system due to critically low levels of both reservoirs. As a generation and transmission provider for the northern Colorado front range, we appreciate the importance of the Colorado River to all of us in the west. Platte River supports the comments from the Colorado River Energy Distributors Association (CREDA), and supports the Notice of Intent's statement of need, which clearly recognizes that current conditions could cause water elevation at Glen Canyon Dam to decline to critically low levels that impair both water delivery and hydropower operations in 2023 and 2024. Platte River must underscore how important hydropower is to the health and safety of all communities that depend on power generation as part of their daily lives.

Platte River is a not-for-profit, community-owned public power utility that generates and delivers safe, reliable, environmentally responsible, and financially sustainable energy and services to Estes Park, Fort Collins, Longmont and Loveland, Colorado, for distribution to their utility customers. From Platte River's inception nearly 50 years ago, hydropower has been a key component of our generation history and commitment to a clean energy future. To this day, our clean energy goals rely on federal hydropower as an existing dispatchable carbon-free resource.

Platte River promised state and federal regulators that it would achieve a 90% noncarbon energy supply by 2030 – the most aggressive clean energy goal in a state, Colorado, committed to clean energy production. The diversity and resilience of our generation portfolio will be integral to achieving this goal. In recent decades, and in particular the last several years, the dwindling supply of water has reduced our hydropower generation levels.

While hydropower can be a strong contributor to grid resilience and reliability, any loss or reduction of hydropower resources can adversely affect public health and safety in the communities we proudly serve. It also has environmental impacts; any curtailment to the Western Area Power Administration's (WAPA's) hydropower requires WAPA and other entities to purchase replacement power with no guarantee that those sources of energy would be from noncarbon emitting sources. Replacing clean

hydropower with purchased power from carbon-emitting sources undercuts our, and others', clean energy goals and potentially adds to the ongoing cycle of drought affecting the river basin.

In addition to the direct effect from insufficient hydropower, Platte River asks Reclamation to consider the effects to the Basin Fund of its proposed action, WAPA's contractual obligations to deliver federal hydropower and the financial and societal costs to firm electric service customers. Reclamation must clearly communicate how changes in water operations will affect firm electric service customers; if Reclamation chooses to pursue releases for water management, it must fully mitigate reduced hydropower production and contract deliveries. Any alternatives analyses should consider direct and indirect cost impacts.

Platte River supports Reclamation's inclusion of WAPA as a cooperating agency and interdisciplinary team member responsible for providing hydropower resource impact modeling and analysis and asks that hydropower remain at the forefront of your analysis and not an afterthought. We are encouraged by Reclamation's commitment to a collaborative process and hope that it continues to seek expertise in hydropower impacts as it considers how to respond to ongoing, severe drought conditions.

Our vision at Platte River is to be a respected leader and responsible power provider improving the region's quality of life through a more efficient and sustainable energy future. We hope you receive this letter with our value proposition in mind and weigh our comments heavily that will help shape a better energy future for all.

Thank you,

A handwritten signature in black ink, appearing to read "Melie Vincent". The signature is fluid and cursive, with a large, stylized "M" and "V".

Melie Vincent
Chief Operating Officer
Platte River Power Authority