

**WESTERN MONTANA ELECTRIC
GENERATING & TRANSMISSION COOPERATIVE, INC.**

P.O. Box 1495 Ennis, MT 59729

February 5, 2013

CRT Review (DKE)
PO Box 14428
Portland, OR 97293

Stephen Oliver, Bonneville Power Administration
David Ponganis, U.S. Army Corps of Engineers, Northwestern Division

Re: Columbia River Treaty Review [Submitted Electronically to treatyreview@bpa.gov]

Dear Steve and David:

Western Montana G&T appreciates the opportunity to provide our perspective on the Columbia River Treaty topics on behalf of over 100,000 electric consumers of Montana. We believe that the most important topics of the list you provided are Hydropower, Flood Risk and Ecosystem issues listed in order of relative priority. As the Iteration 2 studies have demonstrated, the current Canadian entitlement is about 10 times its actual value of approximately 45 aMW. We believe that the U.S. entity recommendation to the U.S. Department of State should identify the most effective approach capable of rectifying this inequity. Flood risk and flood control are important considerations for the future of the treaty but consistent with the approach throughout the U.S. this should be a broader responsibility funded by U.S. taxpayers and not through electric rates. Ecosystem management is an important consideration and much progress has been made through existing forums and funding sources such as the National Marine Fisheries Service Biological Opinion, Columbia River Fish Accords and Northwest Power and Conservation Council Fish and Wildlife Program.

As the U.S. entity completes its review and develops a recommendation to the U.S. State Department during 2013 it should make every effort to produce a clear and well-reasoned recommendation that can produce a remedy to the inequity associated with the current amount of the Canadian Entitlement. At this point it is not yet certain that the most appropriate approach to achieve this goal is a notice of termination but it may become necessary to correct the over-payment of the Canadian Entitlement.

Sincerely,



Joe Lukas
General Manager