

**Schrepel, Eric**

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**From:** Jenkins, Kris  
**Sent:** Friday, November 19, 2004 3:19 PM  
**To:** Lapworth, Heather  
**Subject:** FW: Comment on Draft Power Plan document 2004-12

-----Original Message-----

**From:** FatimaO [REDACTED]  
**Sent:** Friday, November 19, 2004 3:19 PM  
**To:** Jenkins, Kris  
**Subject:** Comment on Draft Power Plan document 2004-12

November 19, 2004

Mark Walker  
Director of Public Affairs  
Northwest Power & Conservation Council  
851 SW 6<sup>th</sup> Avenue, Suite 1100  
Portland, Oregon 97204-1348

**RE:** Fifth Power and Conservation Plan

Dear Mr. Walker:

The Mountaineers, with 12,000 members, is one of the oldest and largest outdoor recreation and conservation organizations in the Pacific Northwest. We have long been active in the public debate on all aspects of electrical energy production, transmission and use, because of its impact on the environment, recreational opportunities and the quality of life in the Pacific Northwest.

We have reviewed the first draft of the Council's fifth plan and have the following comments:

The Mountaineers supports and applauds the Council's emphasis on meeting 2,800 megawatts of future needs with energy efficiency. We believe this is both the most practicable, cost effective and environmentally sound approach. We strongly urge the Council to hold firm on this commitment.

The Mountaineers is also favorably impressed with the Council's goal of 6,000 megawatts of renewable energy from wind development. We would nevertheless note that the 50 average megawatts annual increase proposed is less than many developers are currently building and, less than some utilities are planning to purchase. We believe this goal can and should be substantially increased.

On the other hand, we believe that the plan's proposal to consider obtaining 400 megawatts of coal-fired generation at some point in the future is unnecessary. The 1980 enabling legislation specifically mandated that thermal power is the option of last resort to meet load growth demand. In addition the Council's risk analysis models' consideration of coal-fired generation fails to take into account any future carbon tax or requirements for carbon mitigation. It is apparent that in ten years such cost will be a significant factor in any decision to obtain additional power. Regardless of whether there will be a cost

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penalty for the use of coal plants due to CO<sub>2</sub> emissions, it is not clear that gasified coal plants with the capability to capture and store CO<sub>2</sub> are attainable any time soon. Without that capability, the significant addition of CO<sub>2</sub> emissions to existing sources of CO<sub>2</sub> is not acceptable, especially given the fact that Governor Locke has set a goal for reducing GHG emissions by 10% of the 1990 level by 2020. The Mountaineers urges that this and any other proposals for thermal power be dropped from the Council's plans.

It is unfortunate that the Council has not addressed the weatherization needs of low-income families in the draft fifth plan. No analysis of needs or costs exist, nor are any targets or guidelines for the region's utilities, including the Bonneville Power Administration, provided. The Mountaineers believes that we have not only a societal responsibility to insure clean and affordable energy to low-income households, but there is also great potential for energy efficiencies that may more than offset the "loss" of coal fired thermal generation.

The 1980 federal legislation mandated that the protection of fish and wildlife be given equal consideration with power production. We are very disappointed that the Fifth Power and Conservation Plan neglects this responsibility. The Council must live up to its legal, moral and ethical obligations to provide a framework and guidelines protecting our indigenous fish concomitant with power production. The Mountaineers believes that with foresight and wise planning the region can be assured of adequate power supplies without sacrificing fish conservation operations. Please address the issue of fish and wildlife protection in the Fifth Power and Conservation Plan.

In summary, The Fifth Power and Conservation Plan proposes some positive initiatives on energy efficiency and wind power that the Mountaineers supports. However, it also continues to hold open consideration of coal and thermal power, neglects low-income weatherization, fails to address the central issue of fish protection, and does not provide guidance on transmission system upgrades -all of which we oppose. Also, the Northwest's transmission system is out-of-date. The Mountaineers urges the Council to both endorse and support the Grid West Process or to propose an alternative.

Thank you for this opportunity to make these comments.

Sincerely  
THE MOUNTAINEERS  
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Seattle, WA 98119  
206-284-6310

Ron Eng  
President

Cc: NWEC