



The National Grassroots Organization of Republicans for Environmental Protection

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Northwest Power and Conservation Council
851 SW 6th Ave., Suite 1100
Portland, OR 97204

Dear Council:

REP America, the national grassroots organization of Republicans for environmental protection, offers the following brief comments on the draft Fifth Northwest Power Plan.

The council deserves high praise for recommending aggressive acquisition of energy efficiency and demand-response resources. We strongly agree that, despite the current surplus, aggressive acquisition of efficiency and demand-response resources makes sense as a smart strategy to reduce costs, lower risks, and minimize environmental impacts.

We believe that the region should employ all available tools to ensure that every cost-effective kilowatt-hour is acquired, including stronger codes and standards, market transformation, and the Bonneville Power Administration serving as a backstop to ensure that BPA's wholesale customers acquire cost-effective efficiency resources in their service territories.

In addition, we applaud the recommendation to build up to 6,000 megawatts of wind capacity over the next 20 years. If and when uncertainties about integrating intermittent resources, transmission, and plant siting are resolved, more aggressive development of wind and other renewable resources should be pursued. We recommend strong efforts to confirm the availability and cost of emerging renewable technologies such as biomass gasification, ocean wave, and tidal generation.

We caution the council to be very cautious before recommending additional coal-fired capacity. The recently released Arctic Climate Impact Assessment is another piece in a growing stack of evidence that global warming is a gathering risk that is beginning to affect the Pacific Northwest, the nation and the world right now.

In view of the increasingly likely possibility that carbon emissions will be regulated in some form – through a cap-and-trade system, taxes, or other

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mechanisms – the Pacific Northwest should be very careful about taking on the higher costs of coal.

In view of the serious economic, environmental and public health risks that global warming is likely to bring, coal should not be viewed as a low-cost, low-risk resource unless reliable, cost-effective implementation of IGCC or other advanced coal technologies that integrate CO2 capture and sequestration are on the market. Until such time as such coal technologies are ready for market, we strongly caution the council about recommending large-scale coal development.

As a further cautionary note, the council should be mindful of the ongoing debate in Washington, DC over new federal standards for reducing nitrogen oxides, sulfur dioxide, and mercury emissions from coal-fired power plants. The outcome of that debate is not yet clear, and it is possible that new legislation will result in emissions standards for those three pollutants that are weaker than current provisions in the Clean Air Act. In the event of such a disastrous outcome for public health, no further coal development should be pursued in the Pacific Northwest. We urge the council to monitor this issue closely.

Again, we thank you for producing a well-crafted plan for meeting the Northwest's energy needs in ways that reduce economic and environmental costs and risks. In view of the federal government's chronically insipid actions in energy policy, we believe that enlightened state and multi-state initiatives such as yours are more crucial to our nation than ever.

Sincerely,



Jim DiPeso
Policy Director