

Schrepel, Eric

From: Jenkins, Kris
Sent: Friday, November 19, 2004 4:24 PM
To: Lapworth, Heather
Subject: FW: Sierra Club comments on the 5th Power Plan

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

From: Chase Davis [REDACTED]
Sent: Friday, November 19, 2004 4:22 PM
To: Jenkins, Kris
Cc: 'Chase Davis'
Subject: Sierra Club comments on the 5th Power Plan

November 19, 2004

Sierra Club Comments on the Draft Fifth Pacific Northwest Electric Power and Conservation Plan/ **document 2004-12.**

Submitted electronically to Mr. Mark Walker at comments@nwcouncil.org

Dear Northwest Power and Conservation Council:

Thank you for the opportunity to provide comments on the draft Fifth Pacific Northwest Electric Power and Conservation Plan. On behalf of Sierra Club, please accept and consider these comments as the Council works toward a final plan.

Energy Efficiency and Renewables: We applaud the draft plan for including over the next twenty years 2,800 megawatts in energy efficiency measures. This is cost effective and cheaper than using existing resources. We also support the plan's proposed target of 6,000 megawatts of wind power. We would encourage additional analysis of the potential benefits of investments in solar and more cautious analysis, due to the significant environmental effects, of geothermal, biomass and other renewables. We encourage the Council to continue working with Bonneville, utilities in the region, state governments, and others to insure that these targets are met through a series of short-term action plans as well as incorporation into a new regional framework as anticipated by the Bonneville "regional dialogue."

No Coal Alternative: The 400 megawatts of coal-fired generation identified in the draft is inappropriate, not needed, and should therefore be removed in the final power plan. The selection of new coal over additional wind or energy efficiency is clearly a matter of slight differences in modeling assumptions. A single relatively small coal resource in the plan is a signal that the region is interested in further expansion of coal and is not fully prepared to make the transition to clean energy. The draft identifies another alternative that consists of nearly the same level of risk and investment, but without using coal, and we recommend adoption of that approach in the final plan.

Low Income Weatherization, Needs, and Assistance: The draft is supportive of these concepts, but offers no clear direction for making them a reality. For the final, we encourage further analysis regarding costs and benefits over the next 20 years of a comprehensive implementation workplan for low income weatherization, needs, and assistance. BPA and the utilities very clearly require specific direction from the Council in this area.

11/23/2004

Loss of Fish Operations Probability: The draft completely misses the mark by not identifying adequate protections for fish and wildlife. We can appreciate that the draft was created by the Power Committee and that Fish Staff are working on spill and sub-basin plans, however, one cannot plan for power in the Northwest without planning for wild salmon recovery when there is so clearly a direct connection. Yet somehow fish are not accounted for in the draft. We believe the Loss of Fish Operations Probability to be a great first step in the direction of quantifying data that could positively contribute to the goal of full recovery of wild salmon stocks to harvestable numbers. Why was this formula for calculating chances of causing harm to fish excluded? We can have adequate power supplies without killing fish, but it requires the Council to plan ahead wisely. For the Council to continue to allow the Power Committee to rely on calls for water for generation when it would otherwise assist with fish passage is not in accordance with federal law. For the final, we strongly encourage the Council to include specific provisions for fish and wildlife that will ensure compliance with the equitable treatment law under the Northwest Power Act.

We appreciate the opportunity to provide comments and look forward to working with the Council on the final power plan and its successful implementation.

Sincerely,

Chase Davis, Sierra Club Inland Northwest Regional Representative
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