

snake river alliance

IDAHO'S NUCLEAR WATCHDOG

November 16, 2004

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

RE: Comments on the Northwest Power and Conservation Council Draft Fifth Power Plan

Dear Mr. Walker,

The Snake River Alliance is an Idaho-based grassroots group working through research, education, and community advocacy for peace and justice, the end to nuclear weapons production activities, and responsible solutions to nuclear waste and contamination. I submit these comments on behalf of our board of directors and dues-paying members.

I urge Council members to hold firm on their commitment to energy efficiency. I'm glad that the Council identifies the need for the region to acquire about half of our anticipated load growth with 2,800 megawatts of energy efficiency. I'm particularly impressed with the Council's acknowledgement that energy efficiency is so cost-effective that it should be acquired regardless of load growth, since it's cheaper than many existing resources.

The 6,000 megawatts of new wind scheduled or development is a great step forward, and much more can be done, not just with wind but with other renewables such as solar, biomass, and geothermal to continue expanding these clean and secure source energy sources.

The Council's recommendation for acquiring about 50 average megawatts of wind a year over the next five years is far less than what developers are building and some utilities are planning to buy already. Wind technology is already proven. The Council's Plan should reflect this reality.

Given the potential for low-cost renewable energy and energy efficiency, development of new coal is an unacceptable option for meeting future energy needs. The Council should

104 S Capitol Blvd
PO Box 1731
Boise, Idaho 83701
(208) 344-9161 voice
(208) 344-9161 fax

411 E 6th Street/ERC
PO Box 4090
Ketchum, Idaho 83340
(208) 726-7271 voice

310 E Center Street
Pocatello, Idaho 83201
(208) 234-4782 voice
(208) 232-4922 fax

recognize that burning more coal not only poses risks to human health, but continues to accelerate the global warming that's already reducing our hydropower potential.

“Clean coal” is a myth, and nowhere is that fiction more obvious than in the communities where the polluting fossil fuel is mined. Often, these mines are far from the areas that actually consume the coal-generated electricity.

The Council – and the region's utilities – must face the fact that regulations and taxes on carbon emissions are looming. Oregon and Washington already require mitigation of carbon from new fossil fuel plants. These state and federal initiatives will make coal much more expensive than clean resources such as wind.

The Council must ensure the weatherization needs of low-income families are met. The draft Plan has no analysis of weatherization needs and costs, no targets and, thus, no direction to Bonneville and the utilities. Low-income families need both stable rates and weatherization assistance so no family has to choose between food and electricity.

The Council agrees with Bonneville's plan to quit providing new power for the region's utilities. If the nearly 100 publicly owned electric utilities that rely on BPA power suddenly have to go it alone, standards must be put in place to protect consumers and ensure that the region takes advantage of its energy efficiency and renewable energy opportunities.

BPA and the utilities have to build enough new resources and avoid building too many. Several other regions have instituted mandatory *adequacy standards* to ensure coordinated acquisition of new resources. This avoids wasteful "boom-and-bust" building cycles and reduces the chance of blackouts. The Council should state that mandatory standards are critical.

The Council is not living up to its legal responsibility to treat fish equitably. The draft plan excludes a formula included in an earlier version that would have calculated the chances of harming fish for each particular resource strategy.

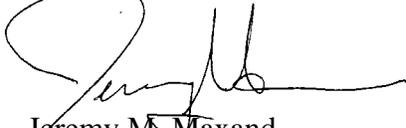
We must stop pitting fish survival against power needs. Eliminating spill over the dams – one of the few proven fish-friendly hydro operations – was back on the table this past summer as Bonneville Power Administration pushed for more income from power production. If we look ahead and plan wisely, we can have adequate power supplies without sacrificing fish-saving operations. I'm disappointed that the Council has retreated so dramatically on fish and wildlife protection.

The Council seems to appreciate that the current transmission system is dysfunctional and that adequate transmission is needed to get wind power to the Western cities. But the Council must propose a solution.

A group representing all of the region's major stakeholders has been working on a new transmission planning and oversight system called Grid West. The Council needs either to endorse the ongoing Grid West process or come up with a better alternative. The region must cooperate to make the transmission system work for everybody, but doing nothing is not an option.

I appreciate your consideration. If you have questions, please feel free to contact me in our Boise office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremy M. Maxand', with a long horizontal flourish extending to the right.

Jeremy M. Maxand
Executive Director