

3TIER Environmental Forecast Group
Advocates for the West
Alaska Housing Finance Corporation
Alliance to Save Energy
Alternative Energy Resources Organization
American Rivers
The Apollo Alliance
Audubon Washington
Avista Utilities
BC Sustainable Energy Association
Bonneville Environmental Foundation
Central Area Motivation Program
Citizens Utility Board of Oregon
City of Ashland
Clackamas County Weatherization
Climate Solutions
The Climate Trust
Community Action Partnership of Oregon
Community Action Partnership Assoc. of Idaho
Conservation Services Group
David Suzuki Foundation
Earth and Spirit Council
Earth Ministry
Ecos Consulting
Ecological Design Center
eFormative Options, LLC
Emerald People's Utility District
The Energy Project
Energy Trust of Oregon, Inc.
enXco Development Corporation
Environment Oregon
Environment Washington
Eugene Water & Electric Board
Friends of the Earth
Golden Eagle Audubon Society
Horizon Wind Energy
Home Performance Washington
Housing and Comm. Services Agency of Lane Co.
Human Resources Council, District XI
Iberdrola Renewables
Idaho Conservation League
Idaho Rivers United
Idaho Rural Council
Idaho Wildlife Federation
Interfaith Network for Earth Concerns
Kootenai Environmental Alliance
League of Women Voters – ID, OR & WA
Metrocenter YMCA
Missoula Urban Demonstration Project
Montana Audubon
Montana Environmental Information Center
Montana Public Interest Research Group
Montana Renewable Energy Association
Montana River Action
Montana Trout Unlimited
Moontown Foundation
The Mountaineers
Multnomah County Weatherization
National Center for Appropriate Technology
Natural Resources Defense Council
New Buildings Institute
Northern Plains Resource Council
Northwest Energy Efficiency Council
Northwest Renewable Energy Institute
Northwest Solar Center
NW Natural
NW SEED
Olympic Community Action Programs
Opportunities Industrialization Center of WA
Opportunity Council
Oregon Action
Oregon Energy Coordinators Association
Oregon Environmental Council
Oregon HEAT
Oregon State Public Interest Research Group
Pacific Energy Innovation Association
Pacific NW Regional Council of Carpenters
Pacific Rivers Council
The Policy Institute
Portland Energy Conservation Inc.
Portland General Electric
Puget Sound Alliance for Retired Americans
Puget Sound Energy
Renewable Northwest Project
Salmon for All
Save Our Wild Salmon
Seattle Audubon Society
Seattle City Light
Sierra Club
Sierra Club, BC and MT Chapters
Snake River Alliance
Solar Oregon
Solar Washington
South Central Community Action Partnership, Inc
Southeast Idaho Community Action Agency
Southern Alliance for Clean Energy
Spokane Neighborhood Action Programs
Student Advocates for Valuing the Environment
Tahoma Audubon Society
Trout Unlimited
Union Of Concerned Scientists
United Steelworkers of America, District 11
WA CTED - Housing Division
Washington CAN!
Washington Environmental Council
Washington State University Energy Program
Working for Equality And Economic Liberation
A World Institute for a Sustainable Humanity
World Steward



Bonneville Power Administration Integrated Program Review - Energy Efficiency 2010 IPR Draft Close Out Report

Comments of the NW Energy Coalition, South Central Community Action Partnership (Twin Falls, ID), Natural Resources Defense Council

July 29, 2010

The Coalition, Partnership and NRDC appreciate the opportunity to submit these comments in support of BPA's proposed energy efficiency budget for FY 2012 and 2013. This proposed budget is consistent with the energy savings targets committed to in the Regional Dialogue policy and the Post-2011 efficiency plan.

BPA is responding appropriately to the fact that the Northwest Power and Conservation Council has identified more cost-effective energy efficiency opportunities than ever before. BPA's continued leadership and experience will be essential in delivering those potential benefits to all Northwest utility customers. The proposed IPR efficiency funding levels properly reflect the need for an even more robust coordinated regional and local delivery strategy.

We support BPA's decision to maintain funding in three categories: expense, capital and administrative support. Expensing investments in areas such as NEEA, RD&D, program design, marketing, evaluation and technical support is an effective and clear strategy. Except for NEEA, the benefits of these types of programs are measured not in long-term savings but in near-term capacity building, facilitation and education.

Using the capital budget as the tool to significantly increase efficiency investments is the right strategy for BPA and its customers at this time. Capitalizing investments that produce clear savings and have savings targets attached to them makes sense for BPA. Energy savings persist over time, just like supply-side generation or other infrastructure investments. Because efficiency measures have varied life expectancies, a 5- to 13-year amortization period seems reasonable. Many measures with much longer useful lives merit 20- to 30-year amortization periods, but we recognize that extended depreciation periods lead to excessive interest payments and to accumulated debt that could make continued funding a challenge. One benefit of increased capital financing is increased involvement by the federal treasury -- a lender that recognizes the value of efficiency assets and can provide low-cost capital to help the region meet its savings and rate stability goals.

While we support BPA's general approach and budget levels, we do have two areas of concern:

1. The low-income and tribal weatherization program receives no funding increase despite the considerable increase in BPA's overall energy savings goal. The previous savings goal was 260 aMW over five years and now BPA's target is 504 aMW. BPA funding allows state and local community action agencies to leverage other funds to maximize the impact of low-income weatherization services. The need for these services has grown and increased funds for 2012-13 would reach state and local agencies just as their ARRA funding runs out. In fact, ARRA funds have caused local agencies to expand their delivery capacity and infrastructure and leaves them well-situated to take on additional funding that maintains important weatherization infrastructure and the pace of delivery. BPA should work with state and local agency staff to determine an appropriate increase in funding for this program, recognizing the increased capacity of the agencies to delivery more service.

2. Given the greater program savings goals and dollar investments, the proposed funding increase for energy efficiency staffing and overhead may be insufficient. While BPA should keep its administrative costs low, it must continue to operate an efficient and effective department. No customer utility should blame BPA's administrative processing of support services for holding up its programs and delivery of services. BPA should consider increasing the internal operating costs for conservation support beyond the \$10.4-10.7 million proposed.

Thank you again for the opportunity to comment. We congratulate BPA for its determined progress on energy efficiency. If you have any questions regarding these comments please contact Nancy Hirsh, NW Energy Coalition at 206-621-0094 or nancy@nwenergy.org.