April 11, 2014

Elliot Mainzer, Administrator
Bonneville Power Administration
P.O. Box 3621
Portland, OR 97208-3621

Re: Bonneville Power Administration draft 2014 Capital Investment Review

Dear Administrator Mainzer:

We appreciate the opportunity to comment on the Bonneville Power Administration’s draft 2014 Capital Investment Review. Our joint comments focus on the issues of priorities and asset strategy development. Our comments address the proposed capital budget for energy efficiency and express our collective concern that BPA’s proposed budget is inadequate to meet BPA’s legal obligations or to pursue the best interests of the region.

BPA should establish a capital budget for energy efficiency sufficient to achieve the savings levels for 2015-2019 identified in the 6th Northwest Power and Conservation Plan. BPA’s proposed energy efficiency capital budget is significantly lower than what it needs to meet those targets. BPA should set its annual energy efficiency capital budgets according to the funds needed to achieve the 6th Power Plan’s annual savings targets, as it did for the FY 2010-2014 energy efficiency budgets. Instead, BPA based its proposed budget on an average of the past five years’ expenditures with a generic index escalator. The proposed budget is not tied to the increasing savings targets identified by the Council.

The Northwest Power and Conservation Act establishes energy efficiency as the region’s first priority resource. The Act also establishes a legal obligation for BPA to acquire energy efficiency first and other resources consistent with the Council’s regional power plan.

We understand the capital constraints and budget pressures on BPA. Acquiring cost-effective energy efficiency actually will ease other budget pressures by reducing the needs for capital investments in new generation and transmission capacity.

Bonneville’s strong track record of acquiring cost-effective energy efficiency has helped keep power costs low and reduced consumers’ electricity bills by billions of dollars each year. BPA’s Case for Conservation shows that the agency’s energy efficiency investments reduced its revenue requirement by as much as $1.7 billion over a 10-year period, thus reducing rates to
its customer utilities. We ask you to maintain this momentum through the first priority to and adequate funding for energy efficiency in the capital budget for FY 2016 and 2017.

Sincerely,

Michael Garrity
American Rivers

Christina Zamora
Community Action Partnership Association of Idaho

KC Golden
Climate Solutions

Bob Jenks
Citizens’ Utility Board of Oregon

Keith Kueny
Community Action Partnership of Oregon

Jeff Hammarlund
Earth & Spirit Council

LeeAnne Beres
Earth Ministry

Chris Herman
Edmonds Community Solar Cooperative and Winter Sun Design

Chuck Eberdt
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Kathy Hadley
National Center for Appropriate Technology

Noah Long
Natural Resources Defense Council

Stan Price
Northwest Energy Efficiency Council

Sara Patton
NW Energy Coalition

Dave Finet
Opportunity Council

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Oregon Progressive Party

Shannon Ellis-Brock
Puget Sound Cooperative Credit Union

Rachel Shimshak
Renewable Northwest

Joseph Bogaard
Save Our wild Salmon

Bill Arthur
Sierra Club

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Snake River Alliance

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