

American Rivers ♦ Citizens' Utility Board of Oregon ♦ Climate Solutions  
Community Action Partnership Association of Idaho ♦ Community Action Partnership of Oregon  
Earth & Spirit Council ♦ Earth Ministry ♦ Edmonds Community Solar Cooperative ♦ The Energy Project  
Idaho Clean Energy Association ♦ League of Women Voters of Idaho ♦ League of Women Voters of Washington  
Montana Audubon ♦ Montana Environmental Information Center ♦ Natural Resources Defense Council  
National Center for Appropriate Technology ♦ Northwest Energy Efficiency Council ♦ NW Energy Coalition  
Oregon Progressive Party ♦ Opportunity Council ♦ Puget Sound Cooperative Credit Union ♦ Renewable Northwest  
Save Our *wild* Salmon ♦ Sierra Club ♦ Snake River Alliance ♦ Solar Oregon  
South Central Community Action Partnership ♦ U.S. Green Building Council Idaho Chapter  
Washington Environmental Council ♦ Washington State Community Action Partnership ♦ Winter Sun Design

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 6<sup>th</sup> 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 6<sup>th</sup> 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**

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of Idaho**

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**Climate Solutions**

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**Save Our *wild* Salmon**

*Bill Arthur*  
**Sierra Club**

*Ken Miller*  
**Snake River Alliance**

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