



## Public Power Council

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June 26, 2015

Phil Rockefeller, Chair  
Northwest Power and Conservation Council  
851 SW Sixth Ave., Suite 1100  
Portland, OR 97204

RE: Comments on the NWPCC's Fish and Wildlife Draft Cost Savings Methodology

Dear Chair Rockefeller,

Thank you for the opportunity to comment on the Northwest Power and Conservation Council's (Council or NWPCC) Fish and Wildlife Draft Cost Savings Methodology. As representatives of the funders of the fish and wildlife program, the Public Power Council (PPC) and its members regularly engage with the NWPCC in development of the program as well as its ongoing management. As you have previously heard from PPC and several of the more than 100 utilities it represents, we have long encouraged the Council to effectively and efficiently manage the program and cut inappropriate and outdated projects to in order to reduce costs. We are encouraged by the NWPCC's draft methodology and are hopeful that this is an effort that will be long-lived in better managing the program.

BPA costs have escalated to the point that the agency will need to take a critical look at managing all of its costs in order to remain competitive in the near future. We note that this methodology importantly includes collaboration with BPA, and we appreciate the Council's understanding of the importance of the agency's larger cost-management effort including the fish and wildlife program.

In addition to the methodology, it would be useful for the Council to bolster the authority that the workgroup review (and recommendation) has on implementing cost savings. In the past, there have been extensive efforts to create supportable recommendations regarding programs that could be reduced, but the follow-through on

those efforts and recommendations were sometimes limited. We are hopeful that this methodology creates a mechanism to induce action after the review is completed.

Related to the prior point is a concern we continue to have that the cost savings principles in the methodology may create too many restrictions on the projects that can be considered. We are supportive of the Council's recognition of the importance of the projects and Accords supporting the BiOp. However, the principles could be interpreted as attempting to put the Non-Accord, non-BiOp projects on an equal footing. If all projects have the same degree of support (or cannot be "burdened"), it is difficult to clearly see which projects the cost savings reviews will consider. Additional clarity on this question would be useful.

Public power appreciates the creation of this methodology and looks forward to continuing work with the Council on this issue to ensure a thoughtful and long-lasting process toward a more effective and efficient fish and wildlife program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bo Downen', with a long horizontal line extending to the right.

Bo Downen  
Policy Analyst