



October 18, 2007

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

**RE: Comments on “Carbon Dioxide Footprint of the Northwest Power System”
(Council Document 2007-15)**

Dear Mark:

The Public Power Council (PPC) appreciates the opportunity for comment on the Northwest Power and Conservation Council’s (Council) study of the CO₂ footprint of the Northwest power system. With climate change and carbon emissions becoming increasingly prevalent on state, regional and national stages, the Council’s study of regional carbon output and how it is expected to change in the future is a helpful analysis.

Summary of Findings

The Council study confirmed that the Northwest is the lowest regional emitter of carbon in the nation because of the hydro system that provides the bulk of its electricity. Despite the hydro system’s benefits however, the Council’s study showed that with future population and load growth, it will be increasingly difficult for the region’s power production to maintain current emission levels and even more difficult to reduce emissions to the 1990 levels referenced as a point of comparison. Although the 1990 levels are not consensus target levels for the region, it would be interesting to see the magnitude of actions required to meet this target, using only current options.

The veracity of the study was bolstered by its frank look at future realities and at data that acknowledges the difficulty of maintaining or reducing the CO₂ footprint of electric generation in the region. While three of the region’s four states have implemented aggressive renewable portfolio standards (RPS) and the Council has recommended an equally aggressive conservation goal in its Fifth Power Plan, the analysis asserts that even

if all of these are achieved – including a hypothetical RPS for Idaho – the region’s carbon footprint will continue growing.

As noted by Council staff, several utility Integrated Resource Plans have been completed since work began on this study, and that data should be included as it does impact the results. It would be helpful if the Council could incorporate this more current data in its analysis.

Snake River Dams Analysis

The PPC believes the Council made a proper decision when it omitted from this draft two of three scenarios that centered on replacing lost generation by the hypothetical removal of the Snake River Dams. In previous drafts it was suggested that the generation lost by removing the Snake River Dams could be replaced by: 1) increased purchases from the wholesale competitive power market, 2) conservation and renewable energy resources and 3) gas-fired generation. The first two options have been omitted in this draft and the PPC agrees with the belief that they were flawed analyses.

As the study’s most recent draft recognizes, assuming replacement of lost generation with market purchases is a flawed in that doing this on a regional level compromises system reliability by reducing the amount of resources available to meet load. Additionally, replacement of lost generation by conservation and renewable energy is also a flawed when considering the realities of regional requirements and usage. As they become available, reliable, and cost effective, additional conservation and renewable resources are being included in utility portfolios to meet RPS laws and in the Council’s future power plans to meet load growth. Proposing that conservation and renewables could fill the void for generation lost by removing the Snake River Dams fails to acknowledge this fact. Furthermore, even if massive amounts of new unallocated renewables and conservation resources became available, concern over emissions would argue for using these to cover load needs from retirement of older coal-fired plants.

Because the analysis of gas-fired replacement of generation by Snake River Dams remains in the study, it should also include the secondary impacts (e.g., increased CO₂ emissions caused by a mode shift of cargo from barge to truck and/or rail transportation) that would result from this action. All of the carbon consequences should be included when assessing proposed changes to the power production of the Northwest hydroelectric system.

Court-ordered Spill


The study notes that approximately 380 average megawatts from coal and gas-fired turbines are needed to compensate for lost hydro energy due to court ordered spill. It goes on to point out that compared to no summer spill, this action increases the average annual CO₂ production in the Northwest by 2.1 million tons. Hopefully this element of the analysis will provoke honest debate in the region and careful consideration of the actual impacts and costs of summer spill in light of the debate over the biological effects.

Conclusion

As the Council study noted, CO₂ production in the Pacific Northwest is considerably lower than that in other regions in terms of electricity produced. But, with essentially the same future resources available as other areas of WECC and the nation, it will be more difficult for the region to maintain or reduce its CO₂ emission rate. The region will continue its leadership in low carbon energy production. But, as utilities meet increasing demand, this will be no small task. We hope the Council's study will be very useful as the region continues to develop energy policies into the future.

Thank you for your willingness to undertake this analysis and for providing the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Scott Corwin".

Scott Corwin
Executive Director
Public Power Council