

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](mailto:nancy@nwenergy.org).