

June 26, 2015

Phil Rockefeller, Chair and Council Members Northwest Power and Conservation Council 851 SW Sixth, Suite 1100 Portland, Oregon 97204

## Dear Phil and Council Members:

RiverPartners (NWRP) appreciates the opportunity to comment on the Council's "Cost Savings Methodology". As you are aware, NWRP's member organizations include more than 40,000 farmers, 4 million electric utility customers, several northwest ports, and small and large businesses that rely on the economic and environmental benefits of the Columbia and Snake rivers. We promote science-based salmon restoration policies and measures balanced with cost-effectiveness. NWRP's members and their constituents pay for the regional Fish and Wildlife Program, the largest and most expensive in the nation, which is driven by both Endangered Species Act obligations and the requirements of the Northwest Power Act.

We begin our comments on this important methodology with a firm congratulations for a clear and systematic approach to identifying opportunities to find cost savings within the Fish and Wildlife Program. As we indicated in our comments on the Draft Fish and Wildlife Program, we believe that a collaborative effort between the Council and Bonneville can result in substantial savings that can be redirected to higher priority objectives in the Program to better benefit of fish and wildlife and BPA's customers' investments. The following is from our comments on the Draft Program:

"[W]e urge the Council to partner with BPA to form a collaborative team (Team) comprised of both BPA and Council fish and wildlife staff. This Team should be tasked to perform a comprehensive audit of measures that are currently funded in the Program starting with a focus on research, monitoring and evaluation projects."

We find the proposed Cost Savings Methodology to be consistent with the effort we suggested in our comments. Further we are pleased to see that your proposed methodology recognizes the importance of measures needed to implement the FCRPS Biological Opinion and the accompanying Accords. These are obviously high priority for the Council's Program and for the region and cannot be reduced without creating future regulatory and legal risks and unnecessary controversy.

Lastly, we support the collaborative approach proposed between the Council and Bonneville. Both of your agencies have important roles to play in managing the Program and its implementation. By working together we are confident that you can identify savings that can then be redirected to higher

priority and more effective measures. We support your approach to deferring how best to spend any savings until actual savings have been secured. This bifurcated process will facilitate an objective review of potential cost reductions without creating unnecessary controversy over how best to expend any savings. We intend to participate fully in those future discussions.

Thank you for the opportunity to comment on this important methodology, and we stand ready to do whatever we can to help you and Bonneville to be successful in identifying future cost savings.

Sincerely,

Terry Flores, Executive Director

**NW RiverPartners** 

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Cc: Lori Bodi, BPA

Peter Cogswell, BPA Bill Maslen, BPA