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From: Bill Kopacz [mailto: ]  
Sent: Wednesday, February 05, 2003 10:03 AM  
To: comments@nwppc.org  
Subject: Comments on draft mainstem amendments,

Mark Walker  
Public Affairs  
Northwest Power Planning Council  
851 SW 6th Ave., Suite 1100  
Portland, OR 97204

Mark,

Midstate Electric Cooperative Inc. fully support the attached document on the mainstem amendments. Thanks for the offer to comments.

Bill Kopacz  
General Manager  
Midstate Electric Cooperative, Inc.  
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<<Mainstem fish points Feb 03.doc>>

### **N.W. Power Planning Council's Mainstem Amendments, requested action.**

- Because of the importance of the Columbia River system to the health of our region, the Northwest Power Act intended the Council to serve a unique role. The Council is given the mandate to look for the best science and apply it to find alternatives for fish and wildlife enhancement that have the "minimum economic cost". This reflects Congress' intent that limited ratepayer dollars be used in the best way possible.
- Our adequate, efficient, economical, and reliable power supply in the Northwest is at risk. Utilities serving millions of residential customers have seen wholesale power rates increase by 45-50% and expect to see an additional double-digit increase this year. Industrial customers write that the rates they face in the Northwest are some of the highest anywhere in the country.
- Ratepayers support protecting fish and wildlife. The Council reports that ratepayers have paid over \$6 billion in fish and wildlife costs in the last two decades. They need to know that expenditures paid through their rates are going to the best use. Funding must be cost-effective. We urge the Council to create cost-effectiveness evaluation tools that follow on ideas of the Independent Economic Analysis Board and the NMFS Science Center, and could benefit fish and ratepayers
- The Council takes some much-needed steps in their Draft Mainstem Amendments to the Fish and Wildlife Plan. These amendments move the region one step closer to more accountability and results-oriented funding for fish and wildlife programs.

- We support the Council's recommendation to replace the April 10 refill target with a more reasoned approach that ensures refill by June 30. This adds much-needed flexibility to water management during the winter season.
- The Council should revise its recommendation that mandates an elevation behind Grand Coulee Dam of 1283 feet from September through December. Because Grand Coulee is a key tool for regional generation in the fall, we urge a more thorough evaluation of retention time needs of these fish. Certainly, there is a less costly alternative to this proposal.
- While the Council recommends no changes in spill operations, we urge the Council to act on their statements supporting a change in spill, especially in summer. The Council's Draft, and current science, makes the following observations:
  - (1) Spilling water to the dissolved gas limits at some dams may be increasing mortality.
  - (2) Spillway passage is the most costly route, especially during high markets.
  - (3) Differences in survival between spillway passage and other methods may be minimal in some instances.
  - (4) Maximum level of fish survival at each project does not necessarily correlate to spill.
  - (5) Spill may have negative effects on returning adults.
- During these difficult budget times, we support other proposals to shave costs including modifying certain spill levels at John Day, Ice Harbor, and The Dalles dams, eliminating spill for Spring Creek hatchery fish, and question whether BPA funding of the Fish Passage Center is an appropriate obligation of the ratepayers.