



Save Our wild Salmon

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- Alaska Trollers Association
- American Rivers
- Association of Northwest Steelheaders
- Boulder-White Clouds Council
- Clearwater Biodiversity Project
- Coast Range Association
- Columbia Riverkeeper
- Defenders of Wildlife
- Earthjustice
- Federation of Fly Fishers
- Friends of the Clearwater
- Friends of the Earth
- Idaho Conservation League
- Idaho Rivers United
- Idaho Steelhead and Salmon Unlimited
- Idaho Wildlife Federation
- Institute for Fisheries Resources
- Izaak Walton League – Greater Seattle Chapter
- Lands Council
- Lighthawk
- Long Live the Kings
- The Mountaineers
- National Wildlife Federation
- Natural Resources Defense Council
- North Cascades Conservation Council
- Northwest Ecosystem Alliance
- Northwest Resource Information Center
- Northwest Sportfishing Industry Association
- NW Energy Coalition
- Oregon Guides and Packers Association
- Oregon Natural Desert Association
- Oregon Natural Resources Council
- Oregon Trout
- Oregon Wildlife Federation
- Pacific Coast Federation of Fishermen's Associations
- Pacific Environmental Advocacy Center
- Pacific Marine Conservation Council
- Puget Sound Harvesters
- Purse Seine Vessel Owners Association
- Rivers Council of Washington
- Salmon For All, Inc.
- Salmon For Washington
- Sawtooth Wildlife Council
- Sierra Club
- The Wilderness Society
- Trout Unlimited
- U.S. Public Interest Research Group
- Washington Kayak Club
- Washington Trollers Association
- Washington Wilderness Coalition
- Washington Wildlife Federation
- Water Watch of Oregon
- Wild Angels
- Willamette Riverkeeper

July 13, 2007

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

RE: Comments on the "Achievable Savings" report, Document 2007-07

Dear Mr. Walker,

"I write you today on behalf of the six million citizens throughout the Pacific salmon states and across the nation collectively represented by the member groups of the Save Our Wild Salmon (SOS) coalition. SOS is a nationwide coalition of conservation organizations, commercial and sport fishing associations, businesses, river groups, and taxpayer advocates – all joined in a commitment to protect and restore Pacific Northwest wild salmon and the communities that depend on them.

SOS is pleased to offer these comments on the draft report from the Northwest Power and Conservation Council ("Council") called "Achievable Savings – A Retrospective Look at the Northwest Power and Conservation Council's Conservation Planning Assumptions." SOS also endorses the comments previously submitted to you by the NW Energy Coalition.

SOS is excited to learn that the Northwest region is greatly outpacing the conservation targets set in the 5th Northwest Power and Conservation Plan ("Plan"). According to your report, the region is acquiring conservation at a much faster pace than the Plan expected. This is good news to SOS since increased conservation in the region could mean less reliance on the outdated and expensive lower Snake River dams.

Oddly, these conservation gains appear to have been made with little assistance from the Bonneville Power Administration (BPA), which we know has not raised its conservation budget. But if others can increase their pace of acquiring efficiency, BPA can too. However, unless the Council increases the Plan's conservation target, SOS fears that BPA and other utilities might ignore opportunities to save their customers money by acquiring all available, cost-effective conservation resources.

For this reason, SOS urges the Council to revise the Plan to increase the total 20-year achievable conservation target by at least 30 percent and to revise the interim targets accordingly. Even though the region is already acquiring conservation ahead of the schedule set out in the plan, we need to set appropriate targets to ensure that that trend continues.



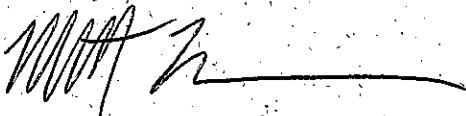
As you well know, the Council's conservation targets are used by utilities around the Northwest as a guideline for their operations. Though these utilities may not simply appropriate the Council's target as their own, it would certainly be a concern to them – and to their regulators and governing boards – if their programs' goals and progress towards their targets was significantly different. We believe that to be reason enough to warrant revisiting the Council's targets.

Additionally, as noted in the NW Energy Coalition comments, in the wake of I-937 – which BPA has committed to meet and most utilities in Washington State are *required* to meet – the targets are much more than simply advisory benchmarks. And since we don't know if the conservation gains are resulting primarily from utilities not subject to I-937, it is all the more important for the Council to revise its annual targets. If the gains we have seen so far are mainly due to non-BPA and/or non-Washington utilities, increasing the conservation target should result in even greater strides in that direction.

As you know, a 2002 study from the Tellus Institute found over 3500 aMW of cost-effective energy efficiency savings available by 2020. The conservation gains we've seen so far give credence to that report's projections and make it clear that the resource potential is much greater than originally projected in the 5th Plan. There is thus ample reason for the Council to increase the total 20-year achievable conservation target by at least 30 percent and revise the interim targets accordingly.

Thank you for the opportunity to submit these comments and please do not hesitate to contact me if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rhett Lawrence', followed by a long horizontal line extending to the right.

Rhett Lawrence
Policy Analyst