



November 4, 2013

Northwest Power and Conservation Council
851 S.W. Sixth Avenue, Suite 1100
Portland, Oregon 97204

Re: Comments on the 2013-2014 amendment process for the 2009 Columbia River Basin fish and wildlife program

On behalf of the National Hydropower Association (NHA)¹, I am pleased to submit the following comments to the Northwest Power and Conservation Council (NWPPCC or Council) in response to the recommendations under consideration to amend the Columbia River Basin fish and wildlife program (Program).²

Background

NHA supports the dual goals of the Pacific Northwest Electric Power Planning and Conservation Act of 1980 (Northwest Power Act): natural resource protection and reliable, economical power supply. NHA further supports the Council's mission to protect, mitigate and enhance fish and wildlife throughout the Northwest's rivers, while also ensuring the region maintains an adequate, efficient, economical, and reliable power supply.

In the Northwest, clean, renewable hydropower generation both from the federal and non-federal system currently meets the majority of the region's electricity needs. As a result of its use of hydropower, the Northwest enjoys a lower air emissions profile and some of the lowest electricity rates in the country.

As the region continues to dramatically increase the penetration of intermittent renewable energy resources, hydropower and pumped storage projects are also providing the necessary grid services to aid in the integration of these resources as well as ensure the reliability and stability of the power system.

¹ NHA is a national non-profit association dedicated exclusively to advancing the interests of the U.S. hydropower industry, including conventional, pumped storage, and new marine and hydrokinetic technologies. NHA's membership consists of more than 180 organizations, many of which are located in the Northwest, including consumer-owned utilities, investor-owned utilities, independent power producers, project developers, equipment manufacturers, environmental and engineering consultants, and attorneys.

² NHA will leave detailed comments on the recommendations to our individual member companies in the region and directs you to those filings for consideration.

Finally, the hydropower industry is strongly committed to river stewardship and better understanding and addressing the potential impact of hydropower development on local ecosystems and fish. The industry invests hundreds of millions of dollars each year in environmental enhancements at hydropower facilities.

2013-2014 amendment of the Columbia River Basin fish and wildlife program

In addition to the benefits resulting from the existing hydropower fleet in the Northwest, there are many opportunities to grow the industry. Already several projects are underway in the region to modernize current facilities through new technology, upgrades and/or capacity additions. Developers are also investigating new hydropower development including low-impact greenfield projects, adding hydropower generation to existing dam infrastructure, pumped storage and marine and hydrokinetic technologies.

With this increased focus on new development, NHA seeks a change in one aspect of the current Program: the lack of mechanisms for developers to propose projects in some areas currently designated as protected, in appropriate circumstances.

NHA understands that the Program, in the past, was amended to designate tens of thousands of miles of streams in the Northwest as protected areas, and to recommend no new hydropower deployment in such areas.

NHA also understands that the previous versions of the Program recognized that circumstances may exist where new hydropower deployment can maintain, and in some cases, enhance fish and wildlife resources. Thus, the Program allowed a party to petition the Council to change the protected status designation of a particular stream or area to enable development, and to allow an exception to a protected area designation for the development of a project with exceptional benefits to fish and wildlife.

However, these mechanisms were removed from the current Program. NHA urges the Council to re-insert them in the 2014 Program.

By doing so, the Council would preserve the option to allow appropriately sited and managed hydropower projects to move forward.³ Whether project proposals ultimately advance should be based on their individual merits in relation to both goals of the Northwest Power Act – natural resource protection and reliable, economical power supply. As such, projects should not be automatically dismissed out of hand without the opportunity for developers to receive a review by the Council.

Conclusion

NHA believes that increased hydropower deployment and natural resource protection are eminently achievable in the Northwest's rivers and streams.

³ NHA notes that any new development proposed by non-federal hydropower interests will undergo a thorough, comprehensive review under the Federal Energy Regulatory Commission's licensing procedures that includes consultation and approvals by federal and state resource agencies, state water quality agencies, as well as engagement by environmental stakeholders and the public.

Supporting new development will allow the Northwest to continue to enjoy the environmental, renewable energy and economic benefits that hydropower brings, while helping to address many of the power needs and issues the region is currently facing.

We appreciate this opportunity to comment on the 2013-2014 amendment process to the Columbia River Basin fish and wildlife program and are happy to respond to any questions.

Sincerely,

A handwritten signature in cursive script that reads "Linda Church Ciocci". The signature is written in black ink on a light-colored background.

Linda Church Ciocci
Executive Director