

**Northwest Power and Conservation Council  
Meeting Summary  
February 16, 2022  
Portland, Oregon – Webinar**

Council Chair Guy Norman brought the meeting to order at 8:30 a.m. Council Members Jeffery Allen, Doug Grob, Ginny Burdick, Louie Pitt Jr., Patrick Oshie, Jim Yost, and Mike Milburn joined the webinar. The next Council Meeting is scheduled for March 14-15, 2022.

**Recognition of Council Member Louie Pitt Jr.**

Chair Norman began by welcoming the newest Council Member out of Oregon, Louie Pitt Jr. Member Pitt is the Director of Government Affairs for The Confederated Tribes of Warm Springs and has long tradition of natural resource stewardship. Chair Norman announced that Member Pitt will assume the Chair of the Public Affairs Committee.

**Reports from Committees**

**Fish and Wildlife Committee**

Member Allen, Fish and Wildlife Committee Chair, reported that the Fish and Wildlife Committee met three times since the January Council Meeting: January 19, February 14, and February 15.

**1. Ocean Forum**

The Ocean Forum was held on January 19 headed by Kris Homel. Over 140 people participated from 30 different organizations. They focused on 5 presentations ranging from salmon abundance, ocean productivity, to actions in fresh water that affect survival in the marine environment termed the 'carryover effect.' There was a discussion on carryover effects covering current actions that managers were taking in fresh water, research needs, and adaptive management considerations for the future.

**2. Informal Hatchery Workgroup Meeting**

On February 14, the Informal Hatchery Workgroup met and previewed three new stories the highlight hatchery funding programs in the basin. These stories outline why hatchery programs exist and detail their connection to addressing mitigation and conservation needs. The Council is continuing to make progress on telling the story of the basin's hatcheries in a regionally coordinated approach. Member Allen highlighted these efforts along with the Hatchery Story Map Web Tool as a great service that the Council offers to the region.

### **3. Progress and Next Steps Under the Willamette River Biological Opinion**

On February 15, U.S. Army Corps of Engineers (Corps) provided a progress update on the 2008 Willamette River Biological Opinion implementation. Their presentation detailed the current operations and actions that are required to protect Endangered Species Act listed populations of Upper Willamette spring chinook salmon, winter steelhead, and bull trout at the Corps' network of dams and reservoirs in the Willamette Basin. Their efforts include restoring habitat, improving fish passage, genetic studies, and research, monitoring and evaluation throughout the system. Work is underway on the new Environmental Impact Statement, and it will be finalized in 2023. A new Willamette River Biological Opinion will be needed in 2023.

### **4. Progress Report on Northern Pike Eradication Efforts in Lake Roosevelt**

Representatives from the Washington Department of Fish and Wildlife, the Spokane Tribe of Indians, and the Colville Confederated Tribes presented on their efforts to eradicate Northern Pike in Lake Roosevelt. Recent surveys indicate that their efforts have been successful so far. The number of Northern Pike being caught is decreasing and the pike are generally remaining in the upper portions of Lake Roosevelt. The group also pointed out that Lake Spokane (Long Lake) has developed a pike problem that will need to be addressed.

### **5. Draft 2022 Fish and Wildlife Division Workplan**

Fish and Wildlife Committee staff gave an overview of the Draft 2022 Fish and Wildlife Workplan which lays out the areas of focus to be accomplished in the next year. The work of the staff is generally organized into three major areas: 1) Program policy development and planning; 2) Program Implementation including the major task of periodic review of projects and tracking implementation by others; and 3) Program performance, although there is overlap between these three areas. The Workplan will continue to undergo refinement, and the full Council will have an opportunity to review the plan and will receive updates upon implementation as they become available.

### **Power Committee**

Member Oshie, Power Committee Chair, reported on the Power Committee Meeting held on February 15, 2022.

#### **1. Further Discussion of Proposed Edits to the Draft Power Plan**

The Power Committee held a meeting to review the final edits to the Power Plan that have been proposed by staff. Member Oshie was happy to report that they have produced a document that is ready to be referred to the full Council for a decision. He took time to

recognize the Committee, staff, and others who contributed to the Power Plan.

## **Public Affairs Committee**

Member Pitt, Public Affairs Committee Chair, reported on the Public Affairs Committee Meeting held on February 15, 2022.

The Public Affairs Committee discussed potential locations and activities in hosting a Congressional staff visit for 2022. Pitt acknowledged the difficult logistics of bringing Congressional staff to the region, but also emphasized the need to reconnect with the Northwest Congressional Delegation after the hiatus due to covid. Executive Director Bill Edmonds and Director of Public Affairs Mark Walker will finalize a plan for the Congressional staff visit.

Fish and Wildlife and Power Committee meeting materials for January 2022 can be found here: <https://www.nwcouncil.org/meeting/council-meeting-february-15-2022>

## **Council Meeting Agenda Items**

### **1. Independent Scientific Review Panel (ISRP) Final Report: Review of Anadromous Fish Habitat and Hatchery Projects**

ISRP Chair Stan Gregory and Richard Carmichael summarized findings from the ISRP's Final Report: Review of Anadromous Fish Habitat and Hatchery Projects. The report includes final comments and recommendations on 122 proposals submitted for the Anadromous Fish Habitat and Hatchery Review. The ISRP found that most of the proposals meet scientific review criteria, or they meet criteria with conditions requiring further action. Over half of the projects reviewed focused on habitat protection and restoration; almost one-third of the projects focused on artificial propagation and the monitoring and evaluation (M&E) required for hatchery operations; and about one-fifth of the projects focused specifically on M&E.

Overall, the ISRP was impressed with the depth and breadth of accomplishments illustrated by individual projects and integrated project programs. A wealth of new information and knowledge has been generated and is well displayed in these proposals in a number of ways, both in terms of the progress that they describe, and full descriptions of lessons learned including publications, education, and outreach. The projects provide extensive contributions to the Program's goals and numerous Tribal, State, and Federal Recovery and Management Plans. Chair Gregory and Carmichael highlighted a number of successful projects related to artificial propagation, protection and restoration of habitat, and M&E in different areas throughout the region. They touted the strong partnerships and collaboration, substantial innovation, project adjustment, and higher-level adaptive management

frameworks involved in the implementation of these projects. Chair Gregory also highlighted ISRP's programmatic comments and recommendations which focus mainly on rigorous M&E and continuous improvement in future project reviews. This report will be distributed to the Council and posted to the [ISRP's webpage](#) on February 10, 2022.

Chair Norman expressed appreciation for the emphasis on successful projects as part of the presentation.

Member Allen thanked Chair Gregory and Carmichael for the presentation, and for their commitment to continue communicating the fish and wildlife needs in the region while highlighting the reality of flat budgets and inflation. Chair Gregory mentioned that in the near future the ISRP hopes to present a 25-year retrospective, looking back at their own progress and how they might improve in the future.

Presentation materials are posted with this summary here:  
[https://www.nwcouncil.org/sites/default/files/2022\\_02\\_1.pdf](https://www.nwcouncil.org/sites/default/files/2022_02_1.pdf)

## **2. Fish and Wildlife Program Strategy Performance Indicators: Review and First Year Progress Report**

Fish and Wildlife staff provided an update on the work accomplished in 2021 on Part 1 of the Fish and Wildlife Program 2020 Addendum: Program Goals, Objectives, and Strategy Performance Indicators (SPIs).

During the 2020 Addendum process, the Council, in collaboration with regional fish and wildlife managers, identified a set of program goals and objectives that reorganized and supplemented the goals and objectives in the 2014 Program. These goals and objectives are tracked through time to evaluate program progress. Achieving the goals and objectives depends on implementing the program strategies described 2014 and 2020 programs, therefore the Council also needs an effective way to measure progress in implementing these strategies. During the Addendum process, the Council and fish and wildlife managers identified 105 SPIs that can be used to track status and trends of ecological and biological conditions.

The 2020 Addendum called for the Council to convene a standing Workgroup to provide guidance to the Council on compiling, assessing, tracking, and reporting on the program goals, objectives, and SPIs. It also called for the Council to begin reporting annually on the status of strategy performance indicators and progress toward objectives and goals. The Council established this Workgroup in 2021, and the group met four times last year in March, May, September, and December.

Staff also provided a walkthrough of the Program Tracker online portal which is still in

development. The Program Tracker is a central portal to access information from program projects and partners that together provide an understanding of the status of the basin and program progress in mitigating for the impacts of the hydrosystem. The Program Tracker is also the central tool that supports information used in the Council's Program Performance & Progress and other Resource Tools and Maps. When the portal is complete, users will be able to query up-to-date species population data across a range of SPIs.

Member Allen asked if it would be possible to link a project with a data set or SPI accessed in the Program Tracker. Senior Program Manager Leslie Bach said that it ties to the other work they're doing tracking program performance, but they haven't yet figured out how to tie it back to the website. Director of Fish and Wildlife Patty O'Toole said she thinks this will be under development in the next year.

Presentation materials are posted with this summary here:

[https://www.nwcouncil.org/sites/default/files/2022\\_02\\_2.pdf](https://www.nwcouncil.org/sites/default/files/2022_02_2.pdf)

### **3. 2021 Power Plan: Comprehensive Discussion of Proposed Edits to the Draft Power Plan**

Director of Power Planning Ben Kujala reviewed the recommended changes to most of the 12 sections of the 2021 Draft Power Plan based on the comments received and considered by the Power Committee.

#### ***Section 1: Introduction***

To address resource adequacy and regional power supply uncertainty, the Council staff added language to the Introduction to convey that these uncertainties and others were addressed by the plan in various analyses. They also added a statement that says the Council will work to be adaptive as the system evolves, and changes will be reported as new results and analyses are available and reflected in the 2021 Power Plan's mid-term assessment.

#### ***Section 3: Demand Forecast***

A slight change was made to the language in Section 3 to address the concern that the Plan understates the potential for renewable natural gas use in the region. Supporting material has also been expanded to provide more information on the sources and assessment of the potential for renewable natural gas.

#### ***Section 4: Forecast of Regional Reserve and Reliability Requirements***

Staff removed the more specific language in Section 4 regarding reserves and reliability. They added a table describing the needs of the power system with greater breadth, showing where reserves and reliability differed from one modeling scenario to the next...

**Section 5: Energy Conservation Program**

Staff changed language to clarify the position on fuel switching, saying that if fuel switching should take place, it should be done so in a way that captures the most efficiency possible. They also added more supporting material and a footnote link to the energy efficient cost-effective methodology.

**Section 6: Resource Development Plan**

Staff added more precise language on climate scenarios as well as links to supporting material, removing the assertion that climate change will result in fewer extreme winter events, and specifying what data is being used and the characteristics of that data.

Staff clarified resource strategy language, not saying whether a certain resource should be considered (or not) but saying that each utility has its own needs and its own process for evaluating those resources.

Within the context of transmission and distribution, staff also added language to convey that regional utilities should consider the plan's recommendations within the context that the plan is looking at regional values, and not looking at location-specific needs.

**Section 8: Recommendation for Amount of Power and Resource Bonneville Power Should Acquire to Meet or Reduce the Administrator's Obligation**

Staff added language and links to supporting material clarifying how the Bonneville portion of regional target (36%) was calculated.

**Section 10: Recommendations for Research and Development**

Staff added paragraph emphasizing the need to broaden regional extreme event analysis, acknowledging there is work that can be done.

To address comments on the Council's role in transmission and generation expansion, staff added a paragraph clarifying that the Council's work requires a working knowledge of the transmission system, and that knowledge comes from directly engaging with the region's transmission planners.

**Section 11: Methodology for Determining Quantifiable Environmental Costs and Benefits and Due Consideration for Environmental Quality, Fish and Wildlife, and Compatibility with the Existing Regional Power System.**

Staff added language saying the Council is committed to working with stakeholders throughout the region to help guide the consideration of the aggregated effects of new renewable resources.

Staff added a discussion and supplemental materials describing the Federal Columbia River Power System spill agreement.

General Counsel John Shurts addressed the comments in Section 11 regarding the Lower

Snake River Dams. He wanted to remind the Members that the Council's task in the Power Plan under the Power Act is to recommend what new resources should be added to the existing system. And that existing system during the plan can also include if we know an existing system is scheduled for retirement during the planning period.

He wanted to make clear that the Council's task under the Act is not to assess whether existing resources should be retired or recommend whether it be retired at all. Again, ours is a new resource strategy depending on what changes are coming that will affect the power system.

Shurts and Kujala also wanted to make clear that the Council can always do analyses across the entire range of things that will affect the power system- demand, resource costs, etc. One of the costs the Council can analyze is what would happen to that new resource strategy. Staff could analyze the power system effects if we were to lose the output of an existing resource, but not for one that isn't scheduled for retirement yet. And the Council has done this for various resources both in this plan and in prior plans. We have done it both within and outside a Power Plan process, but it's not something we're required to do per the Act in order to have a satisfactory resource strategy that has the baseline conditions of the existing system in it.

Shurts emphasized that if they do an analysis of this type, what they're analyzing are the power system impacts and the effect on the new resource strategy. It's not about analyzing whether or not that existing resource should be retired, or about recommending its retirement.

Shurts emphasized that the Council has always been clear and consistent about this, in past Power Plans, in the lead up to this Power Plan, in the Draft, in the supporting materials to the Draft, and now in the Final.

While today is the decision on adopting a Plan, staff will also be producing for Council approval a Response to Comments. This will be delivered to the Members possibly in March or April. It's not part of the Plan, but it is something that staff does need to produce. Once we do that, we'll have wrapped up the Power Planning process and put notice in the Federal Register.

We're changing a bit how we describe the next steps in analysis we might do for information's sake, for ourselves and others, but we're not changing the approach to how we understand our obligations and abilities under the Act.

Kujala expressed that he hopes this process shows that Council staff and the Power Committee carefully considered the comments that were submitted. He thanked all of the commenters and said they were instrumental in the Draft review process. Member Oshie expressed that he is pleased with the final product, and he spoke on behalf

of the Power Committee that they are presenting this Power Plan to the full Council for adoption. The Northwest Power Act requires the Council to produce a Power Plan that will assure the region of an adequate, efficient, economical, and reliable power system, while at the same time addressing the environmental impacts that may be associated with system operations. Pat said he believes that task is complete. They've used and have been informed by the full record that was developed through their preparation work. They've worked along with the public. The Power Plan's findings and conclusions built upon on this record. In the end, they believe the Power Plan's outcomes are both balanced and reasonable. More importantly, the outcomes are consistent with the Council's obligation to provide a product that meets the resource adequacy needs of the region and the demands of the Power Act.

On behalf of the Power Committee, Member Oshie commended the work of the Advisory Committees along with input from governments, utilities, stakeholders, and members of the public. He also commended the hard work of the staff, saying the Plan is built upon a foundation created by their hard work, their diligence to the task at hand, and their insistence on getting it right. Finally, he offered deep and sincere thanks to colleagues on the Power Committee, Member Yost, Member Grob, Member Burdick, and he pointed out the work of Member Devlin and others. With that, Member Oshie presented the Plan to the full Council for adoption.

Chair Norman applauded the hard work of the Committee, staff, and people throughout the basin who contributed to the Plan.

Member Yost echoed Member Oshie remarks and said that even though the Plan is finished, there is still important work outlined by the Council to be done. He said he anticipates a lot of hard work on the next 3 or 4 years to make sure the Plan is operational. He expressed his appreciation for being able to work with the Power Committee.

Member Burdick expressed her appreciation for the efforts of the Power Committee, Council Members, and staff.

Member Grob noted the difficulty of completing this work during this shifting time and complimented staff and the Power Committee on what he considers to be a heavy lift accomplished.

Presentation materials are posted with this summary here:  
[https://www.nwcouncil.org/sites/default/files/2022\\_02\\_3.pdf](https://www.nwcouncil.org/sites/default/files/2022_02_3.pdf)



## **Council Decision to Approve 2021 Power Plan**

Vice Chair Grob moved that the Council:

- approve the 2021 Northwest Conservation and Generation Power Plan as presented by staff [with the changes made by the Members at today’s meeting];
- appoint an editorial committee to work with staff to make any non-substantive editorial revisions as necessary; and
- direct the staff to prepare the plan for publication and provide public notice of the Council’s decision.

Requires a roll-call vote

### **Discussion**

Member Pitt expressed that he’s been impressed with the Council, staff, and Power Plan. He asked that the Council Members talk more about this effort.

Chair Norman praised the hard work of the Power Committee and that he is impressed with the thorough and comprehensive process to create this Plan. He believes that the product they’re approving today is forward looking and sets the stage for the region to make sure we meet our obligations for an affordable, reliable, and efficient power system.

Member Milburn expressed that he is very pleased with the outcome of the Power Plan, and he appreciates the way everyone collaborated in its creation.

### **Roll call vote**

Executive Director Bill Edmonds conducted the roll call vote.

Member Yost	Aye
Member Allen	Aye
Member Burdick	Aye
Member Pitt	Aye
Member Grob	Aye
Member Milburn	Aye
Member Oshie	Aye
Chair Norman	Aye

**Motion was approved.**

Chair Norman congratulated Power Committee Members, Council Members, and staff. He also acknowledged former Chair Richard Devlin for his part in leading the Council through a good portion of the development of the Power Plan.

#### **4. Discussion and Decision to Proceed with Scoping a Draft Workplan for a Proposed Lower Snake River Dam Power Analysis**

Public comment on the draft 2021 Northwest Power Plan indicated a significant amount of interest in having the Council analyze power system options in the event that the federal government decides to pursue further study or consideration that would impact the power and hydro system without power generation at the Lower Snake River dams (LSRDs). In response public comments and believing that the Council's analytical power system expertise can be of assistance to the decision makers, Chair Norman requested that staff draft a workplan for the Council's consideration that would outline the work required and a timeline for completing it.

Director of Power Planning Ben Kujala presented the staff's phased approach with a timeline of 12 to 27 months to complete this analysis.

1. Estimate operation of the LSRDs under uncertain future conditions
2. Examine hydro-system impacts to remaining hydro projects in a power system excluding the LSRDs
3. Estimate incremental reliability needs of a system excluding the LSRDs
4. Identify different resources or combinations of resources to test as strategies for returning the power system to a similar level of reliability
5. Estimate the impacts or range of impacts on the region's total power system cost
6. Examine the reliability outcomes
7. Collect findings into a white paper

Staff has scoped out a draft workplan exploring what it would take to analyze the regional power system excluding the Lower Snake River Dams and what resources or combination of resources could be added back to the regional power system to achieve a similar level of reliability as a regional power system that includes the dams. This workplan is not comprehensive of all the analysis that would be needed by a decision maker considering these resources. The analysis described does not focus on outcomes for fish and wildlife, the economic viability of the LSRDs, irrigation, navigation, or any other non-power-related uses of these projects.

The workplan incorporates several ideas and approaches that staff believes would set apart a study by the Council from previous efforts:

- The Council redeveloped the GENESYS model, our resource adequacy model, for the 2021 Power Plan. No previous analysis of a power system excluding these projects has used this model which has greatly increased the fidelity in understanding the hydro system interaction with the rest of the regional power system and external markets.
- The 2021 Power Plan has a range of scenarios that look to future operations of the regional power system, which we can leverage (or utilize) in this analysis. These scenarios allow us to go beyond looking at the past and estimate the future demands and use of the Lower Snake River Dams. The scenarios explore policy driven trends like aggressive thermal resource retirement, high-penetration renewable grids, and explosive load growth from electrification of transport and other non-electric regional energy use.
- With project-level fidelity and an integrated electricity dispatch and waterflow model, we have the capability to model detailed expert estimates of how the system would operate with and without the services provided by the Lower Snake River Dams and the impact of not having these services available on the hydro system projects.

Kujala proposed taking any input from the Council on the workplan, then incorporating that input into a draft that would be taken to a broad group of regional experts for further refinement. Staff would then bring back a revised workplan with consideration and discussion of the feedback to the March meeting. At that time, or at a future meeting, a decision to proceed on the workplan will be presented to the Council.

Member Yost expressed concern the impact of this effort on the budget and on the time it would take for the Power Committee to do this work. He suggested that staff put together a more detailed scope of work so they could get a better estimate the cost and time it would take to support this.

Member Oshie stated that he is supportive of taking the next step with the effort and echoed the need for a more detailed scope of work to be reviewed by the Council. He said this is an issue that has been on the table for a long time, and it would be good for the Council to offer its opinion to the region.

Member Allen stated that he received a flurry of phone calls to the Idaho office regarding this analysis, and he voiced some of the concerns of Idaho constituents. One concern Member Allen noted was lack of faith in the new GENESYS model. Member Allen asked Kujala what it's going to take to get the rest of the region (e.g., BPA, IOUs) to have confidence in the redeveloped GENESYS model and how long would that take. Kujala explained that the practice of always to being open and transparent with everyone on every detail invites feedback and ends up being a cooperative process. Kujala also mentioned that they can still compare GENESYS results to other models which would help give people a better idea of what GENESYS does.

Member Allen also mentioned that people were concerned this analysis would be rushed

because of other processes taking place within the Council. Kujala addressed this concern during his presentation which showed a timeline of 12 to 27 months.

The last concern Member Allen mentioned is that people feel they have been burned by incomplete analysis of the LSRDs in the past, which failed to account for all the factors that go into maintaining a reliable, adequate, and economic power system. Allen said that hopefully this was also alleviated with Kujala's presentation.

Member Burdick emphasized that feelings on the LSRDs run strong, but she also highlighted the Council's position as a nonadvocacy and nonpartisan organization that excels at objective analysis.

Chair Norman agreed that Council staff is best positioned to do an objective analysis along with the ability to solicit outside expertise and advice beyond the Council, and to answer the major questions of what does the future contribution of these dams look like, and what would it take to reach a similar level of reliability if that resource was not there in the future? Chair Norman is in support of moving forward with asking staff to create a more detailed scope of work to present to the Council in March or April.

Member Pitt and Member Allen agreed as long as it's just scoping at this stage and nothing more than that, and they stressed the importance of being clear with that message.

Presentation materials are posted with this summary here:

[https://www.nwcouncil.org/sites/default/files/2022\\_02\\_4.pdf](https://www.nwcouncil.org/sites/default/files/2022_02_4.pdf)

### **Council Decision to Approve Scoping a Draft Workplan for a Proposed Lower Snake River Dam Power Analysis**

Vice Chair Grob Moved that the Council authorize the staff to begin scoping a draft workplan for a proposed Lower Snake River Dam power analysis, as presented by staff, and return to the Council at the March meeting or later for Council discussion and approval of a workplan before beginning the actual analysis.

Member Yost seconded.

No discussion.

Voice vote – all in favor, none opposed.

Motion was approved.

## **5. Council Business**

### **Council approval of the January 2022 Council Meeting minutes**

Vice-Chair Grob moved that the Council approve for the signature of the Vice-Chair the minutes of the January 12, 2022 Council Meeting held in Portland, Oregon via webinar, as presented by staff.

Member Yost seconded.

No discussion.

Voice vote – all in favor, none opposed.

Motion was approved.

### **Public Comment**

Jim Robbins, President of the Idaho Consumer Owned Utility Association (ICUA), stated that they oppose conducting the LSRD analysis. The reasons he gave are-

1. Studies have been done, and the conclusions have been that the dams need to remain. They feel that is sufficient and the resources need to be directed to other means.
2. The region is experiencing phenomenal growth. This coupled with the electrification of virtually everything makes it a bad time to take these resources offline. We don't want to be a California or Texas given an unusual climate event. And we don't have the resources to cover it.
3. The dams are already connected to the grid in an optimal place. Any replacement resources have to account for transmission. And if we've learned anything from the Boardman to Hemingway projects, it's that transmission projects are very time consuming, expensive, and nearly impossible to do.
4. They believe that dams provide the greatest resource to make the solar and wind work.
5. If you believe in global warming, you wouldn't take out a non-carbon emitting resource.

Robbins said that if the Council decides to put a study together, it has to be released in its complete form with all comments and data included. Partial delivery of the study can lead to misunderstandings and hurt the value of the study. They believe the resources would be better delivered to things like how the ocean affects salmon and salmon recovery. Ratepayer dollars would be better spent looking at this instead of the dams.

Michael Darington, General Manager of United Electric Co-Op Inc., said that United Electric appreciates Council staff's technical expertise, and that they certainly have the capability to

perform an analysis on the hydrosystem. However United Electric has significant concerns with proceeding with this study.

1. A study of breaching the 4 Lower Snake River Dams is unnecessary at this time because the Federal Government that owns and operates these facilities has decided not to pursue further study for consideration of the Federal Columbia River Power System (FCRPS) without the 4 LSRDs.
2. The proposed study is focused on a single most extreme alternative to operations of the FCRPS rather than as a result of a comprehensive decision-making process. He said that he appreciates that the staff states the proposed analysis does not consider outcomes for fish and wildlife, the economic viability of the LSRDs, irrigation, and navigation. Neither is it clear on the level of detail the analysis will account for the all-encompassing costs of breaching of facilities and replacement resources. In essence, given the timing of other regional processes, the proposed study appears to accommodate a subset of interests and does not consider all aspects of hydro operations on the FCRPS.
3. The FCRPS has already been comprehensively studied through a multiyear process, and the results were included in the Columbia River Systems Environmental Impact Statement (CRSO EIS), with the final record of decision issued on September 28, 2020.

If the Council elects to pursue the proposed analysis, the results should not be released without allowing for complete, independent consultation and review, and stakeholder involvement from specifically from BPA and public power customers.

Given the rapid development of issues related to resource adequacy, carbon free generation, load growth, and deployment of renewable resources throughout the region, the safe, clean, reliable hydro resources of the FCRPS, including the 4 LSRDs are more important than ever. And a study of breaching those dams runs counter to power needs.

Nicolas Garcia, Policy Director of the Washington Public Utility Districts Association, commented on the Draft Plan. He expressed that working with Kujala in the past has been a pleasure and the development is one that they've followed closely.

1. Garcia believes that the best way to describe the current state of the GENESYS model is that it's not finetuned enough yet to provide enough information to really give a constructive review of how the river system is operating when you get to this level of granularity. They think it could be, but it's not there yet, and applying the model at this time they worry that the Council is not going to get the accurate information that is necessary to help further the public discourse on this issue.
2. If the Council decides to move forward with the scoping analysis, they ask that the actual scope be developed in an unrushed public process that is fully vetted and peer reviewed. He mentioned that Kujala noted that preparing the analysis is not going to be simple, but they think that preparing just scoping portion isn't going to be simple, and it's going to take some time to make sure we fully think through the

scenarios we are investigating to make sure that they're relevant to the questions at hand.

3. They also ask that the Council should clearly indicate whether or not the analytic scenarios that the scoping analysis is going to review were developed in coordination with other ongoing state processes, or regional processes. And if not, acknowledge that it wouldn't be appropriate to drop the output of this analysis into other processes. Because you're going to have different assumptions going into each.
4. Another thing they would like are very specific scenarios when the analysis is done. Washington state has a directive to eliminate all carbon emitting electric generation resources by 2045. They would like this to be overlaid with the elimination of the LSRDs. We have to really think though what's happening in states in order to make sure we fully understand what the consequences of eliminating these dams are.
5. Another general scenario they would like to see is the full implementation of all existing and expected carbon reduction strategies to achieve other state goals.
6. Finally, the Draft Plan should acknowledge that these dams have multiple purposes, and that this particular analysis is really narrowly scoped to just one of the purposes. And therefore, we have to be clear that this is not an estimation of the benefits of the dams, it's a subset of the benefits of the dams.

Scott Simms, Executive Director of the Public Power Council (PPC), mentioned that the PPC also received phone calls from members across the Northwest expressing concerns about the LSRD analysis, the timing and scope, and also expressing a lack of faith in the new GENESYS model to take on such a large-scale undertaking. A few others called about the (CRSO EIS) that concluded on September 28, 2020. The last time such a sweeping effort was conducted was in 2002, and there had been several calls from stakeholders across the basin to do a more contemporary update of all the aspects, going into an extensive effort across all elements around the LSRDs and everything they affect and touch. An argument could be made that 2002 was the last time the LSRDs were analyzed, but the recent CRSO EIS represents a massive and exhaustive effort with regard to studying the LSRDs. It was a multi-year process involving 59,000 comment letters and multiple meetings and engagements because it was looking at the system in totality. He conveyed that the recent CRSO EIS is what a lot of people look to as being a very contemporary and extensively conducted analysis on the LSRDs. The Council is going to push forward with scoping, but if they do decide to conduct a study of the replacement of the power output that they should make sure that it's additive to the CRSO EIS. This can't be rushed. The Council needs Bonneville's help and their expertise in this system is paramount. And like others have said, it would be dangerous to release any preliminary results.

Scott Levy, host of bluefish.org, mentioned that he appreciated Scott Simms point that the CRSO EIS is a current and substantive document, but he asserted that the narrative of the speakers before him and that of Kristin Meira of the Pacific Northwest Waterways Association is misinformed. He believes according CRSO EIS that if the LSRDs are removed and the 730 aMW are replaced, that electricity rates for the entire region will go down and the environment, fish, and wildlife will benefit. He points to this as the most economic and 'lowest probable cost' solution and believes this scenario should be part of the 2021 Northwest Power Plan.

Heather Nicholson, Owner/Member of Orcas Power and Light Company first thanked the Council for reviewing and considering the 2021 Power Plan comments that asked for a LSRD analysis, and she thanked the staff for the quality of their work. She said that the region knows that it is of huge importance to fully recover and restore endangered Snake River fish and the southern resident killer whales. The region is putting an awful lot of resources into doing it, so there is a clear need to know what the system looks like without these 4 dams. The fish stocks are out of time and the southern resident whales are out of time, so she supports the Council doing the analysis, making sure that it remains based on unbiased reliable analysis and is done without delay.

Chair Norman again extended congratulations to all for the passing of the 2021 Power Plan. He mentioned that the March Council Meeting will take place in Coeur d' Alene. He adjourned the meeting at 1:30 p.m.

Northwest Power and Conservation Council meeting materials for February 2022 can be found here: <https://www.nwcouncil.org/meeting/council-meeting-february-15-2022>