Comments On Proposed High Level Indicators of Progress on the Pacific Northwest Electric Power Planning and Conservation Act's Power Plan Goals

Submitted By Northwest Resource Information Center¹ Ed Chaney, Director October 31, 2014

Oh my. This exercise surpasses the absurdity of a Monty Python skit.

Of the thirteen metrics being considered for adoption, none address the fact that the Council's Power Plan/regional energy portfolio is based on the virtual destruction of Snake River salmon and concomitant ecological, economic and social damage of epic proportions.

Of course, the Power Plan, which includes the Fish and Wildlife Program, by law is supposed to restore salmon decimated by the Federal Columbia River Power System while maintaining an adequate, efficient, economical and reliable power supply. It does not restore the salmon; it threatens their existence. It does not maintain an efficient, economic power supply; it maintains what is arguably the most inefficient and economically costly power supply in the Nation.

But it is pointless to engage the Council in this charade of "proposed high level indicators of progress" except in federal court.

The following are incorporated into these comments by reference:

Comments On Seventh Power Plan Issue Paper: *Methodology for Determining Quantifiable Environmental Costs and Benefits,* September 2014. Submitted By Northwest Resource Information Center, October 31, 2014.

NRIC's comments on Appendix P to the Sixth Power Plan, and NRIC briefs and the record in *NRIC v. NW Power and Conservation Council*, 730 F.3d 1008, 1021 (9th Cir. 2013).

Comments on *Public Review Draft Columbia River Basin Fish and Wildlife Program 2013/2014*, Northwest Power and Conservation Council Document 2014-03, submitted by Northwest Resource Information Center, July 25, 2014.

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¹ NRIC is a scientific, educational organization incorporated in 1976 under section 501 (c)(3) of the Internal Revenue Code specifically to address the then-critical threat to the survival of Snake River salmon posed by four dysfunctional Army Corps of Engineers' dams on the lower Snake River in southeastern Washington.