

High Level Indicators of Progress on the Pacific NW Electric Power Planning and Conservation Act's Power Plan Goals

Comments of the NW Energy Coalition

October 31, 2014

Introduction

The NW Energy Coalition (Coalition) is pleased to offer comments on the *High Level Indicators of Progress on the Pacific NW Electric Power Planning and Conservation Act's Power Plan Goals* Issue Paper (Indicators Issue Paper). These recommendations respond directly to the first two questions contained within the paper – to avoid duplication, responses to the final two questions (regarding proposed but not adopted measures and resources) are incorporated into the replies to the first two questions.

I. Are the proposed metrics meaningful measures of progress toward the Act's purposes and the Council's Power Plan goals?

The Council proposes a number of metrics that are meaningful measures for progress toward the Act's purposes. Council staff should be commended for the time and effort put into researching and analyzing potential measures.

All of the metrics recommended in the Indicators Issue Paper should be adopted by the Council, with two exceptions. First, the Council should not adopt the metric "Regional Generating Resource Availability." This measure is not clearly defined in the draft and it is unclear whether this should be based on forced outage rate, total outage rate, or other measurements. Also, in a hydro-dominated system, it is not clear what this metric indicates. Instead, we recommend that the Council establish a small working group including transmission planners (utilities, BPA, ColumbiaGrid, NTTG, Peak Reliability), renewable energy developers and advocates to discuss ideas for meaningful reliability indicators.

Second, while it is essential to track progress on renewable resource development, we share the concerns expressed by Renewable Northwest (RNW) that the metrics presented in the Indicators Issue Paper do not adequately capture regional progress on renewables. Specifically, the "Annual Trends in Renewable Resource Costs" metric, as presented, is unsatisfactory. Wind generation capital costs should not be used as a proxy for all renewable resources. At a minimum, solar resource costs should be included in the metrics. Additionally, adding one or two other indicators for renewable resources, such as the metrics suggested by RNW to represent

integration costs and geographic diversity, will provide better information regarding progress toward the Act's purposes with respect to renewable resources.

II. Are there other metrics that would serve as better measures of progress?

The Coalition recommends adopting the following metrics in addition to those identified in the Indicators Issue Paper. In particular, it is critical that the Council adopt at least one indicator measuring greenhouse gas emissions.

Greenhouse Gas Emissions

- *Total annual electric sector GHG (100-year Global Warming Potential)* with sub-indicators for CO₂ and methane. Regional vs. national information would be useful, as suggested in the "considered but not proposed" section of the Indicator Issue Paper.
- *Regional CO₂ intensity per MWh*

Energy Efficiency

- *Total System Costs Reduced Due to Energy Efficiency:* The Council should work with the Bonneville Power Administration (BPA) to establish a measure that tracks the total system costs reduced due to investments in energy efficiency over time.
- *Annual Non-programmatic Savings vs. Plan Targets*
- *Capacity Savings from Energy Efficiency and Demand Response (total KW):* The Council indicates that the region is becoming more capacity constrained over time and as such should track utility efforts to reduce peak.

Hydropower System Efficiency

- *Hydropower Generating Efficiency Upgrades (total MWh):* The Council should request that BPA supply the cumulative value of all hydropower efficiency upgrades. This information should be updated on an annual basis.

Renewable Resource Development

- Subindicators under "Cumulative Renewable Resource Development" for major resource type: wind, solar, geothermal, and as soon as practical, for distributed renewable generation.
- We support the recommendations contained in the comments from Renewable Northwest regarding additional metrics for renewable resource development.

Reliable Power Supply

- *Annual Utilization for Pacific Interties*: total flows compared to total available capacity data
<http://transmission.bpa.gov/Business/Operations/Paths/Interties/ACDC.xls>
- Also, note the recommendation above to convene a workgroup on this topic. Metrics for the workgroup to consider include, for example, transmission event levels (loss of load, exceedance of standards for voltage, frequency, and system operating limits).

Vehicle Electrification

- *Total number of all electric vehicles registered in the region and estimated MWh for electric vehicle VMT*
- Eventually, as data becomes available, the Council may want to add: *Total Regional VMT and Hybrid/All-electric VMT*

Other

- *Annual Generation Additions To Load Service by Type of Generation (MWh)*. The Council proposes to track annual renewable resource contributions and annual energy efficiency savings as a share of regional load. It would present a more complete picture of our regional progress toward the Act's goals if the Council reported metrics that measure all annual additions to load service by type. This should include combined heat and power and natural gas generation.