

Comments of the Community Action Directors of Oregon and the Oregon Energy Coordinators Association on Bonneville's Long-Term Regional Dialogue Policy Proposal

October 31, 2006

The Community Action Directors of Oregon (CADO) and the Oregon Energy Coordinators Association (OECA) together represent the individual Oregon community action agencies that deliver low-income energy service programs in Oregon. The following agencies (with the location of their head office noted) deliver the BPA low-income weatherization program in Oregon:

- ACCESS, Inc. – Medford, Oregon
- Community Action Organization – Hillsboro, Oregon
- Community Action Program of East Central Oregon – Pendleton, Oregon
- Community Action Team, Inc. – St. Helens, Oregon
- Community Connection of NE Oregon – La Grande, Oregon
- Clackamas County Social Services – Oregon City, Oregon
- NeighborImpact – Redmond, Oregon
- Community Services Consortium – Corvallis, Oregon
- Harney County Senior and Community Center – Burns, Oregon
- Lane County Human Services Commission – Eugene, Oregon
- Mid-Columbia CAC – The Dalles, Oregon
- Mid-Willamette Valley CAA – Salem Oregon
- Oregon Human Development Corporation – Portland, Oregon
- Oregon Coast Community Action – Coos Bay, Oregon
- Umpqua Community Action Network – Roseburg, Oregon
- Yamhill Community Action Partnership – McMinnville, Oregon

We commend BPA and the many participants who have worked diligently on the development of this Regional Dialogue proposal. We urge all parties to continue to work together toward a resolution of these critical, and sometimes contentious, issues in a manner that not only benefits the entire region but also maintains the region's solidarity when future issues arise that jeopardize our valuable Columbia River hydroelectric resource. In this spirit we offer the following comments.

- We commend BPA's pledge to capture its share of this region's energy efficiency and renewable energy goals as laid out by the Northwest Power and Conservation Council. We agree with "The Energy Project", and others, that the costs associated with these resource acquisitions be assigned to the Tier 1 rates.

- We are not as sanguine as BPA about passing the obligation for securing new resources, particularly cost effective energy efficiency and renewable resources, to individual customers (utilities). It is important that BPA maintain its statutory role as reflected in the 1980 Northwest Power Act, and as reflected in BPA's pledge, to acquire these resources. We agree with the NW Energy Coalition that this proposed transfer of responsibility is a dangerous gamble.
- BPA should not consider its proposed allocation of up to \$21 million per year for renewable energy as a cap, but rather as a minimum annual funding level. Further, while we agree that stockpiling wind sites may be a good investment we heartily encourage BPA to actively pursue the full integration of wind, and other cost effective clean renewable resources into the region's supply portfolio.
- We agree with the NW Energy Coalition, The Energy Project, and other who are urging BPA to stop blaming necessary fish survival programs for its failure and/or delay in offering sufficient, and needed, wind firming services.
- It is important that a fair and equitable settlement be negotiated as it relates to the future of the residential exchange. The residential exchange provisions of the 1980 Northwest Power Act helped ensure that all Oregonians shared in the benefits of the Federal Columbia River Power System (FCRPS). We do not look favorably upon resolutions to the residential exchange discussions that result in disproportionate rate changes between IOUs and COUs. We agree with Oregon's Governor, Ted Kulongoski, that the final resolution of the Regional Dialogue should not reduce the value of the residential exchange from current levels.

The challenges that BPA, and indeed this entire region, faces to the low cost, clean and reliable electricity provided by the FCRPS are both real and recurring. It is essential that the resolution of the Regional Dialogue issues maintain and reinforce our common interests so that this region remains united and steadfast in preserving the benefits of the FCRPS for the entire Northwest.

Thank you again for this opportunity to comment.

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