

June 3, 2011

Bruce Measure, Chair
Northwest Power and Conservation Council
851 SW Sixth Avenue, Suite 1100
Portland, Oregon 97204

Dear Northwest Power and Conservation Council and staff,

Northwest Requirements Utilities, a trade association representing 50 load following customers of BPA, takes this opportunity to comment on the evaluation of the “B Group” of Research Monitoring and Evaluation projects. The Fish and Wildlife program funding is the largest single element of BPA’s cost structure. For our membership these costs represent about 33% of their total Power Services bills from BPA. These utilities want to ensure that the funds that they provide BPA for these programs are being used wisely. To that end NRU provided these comments to BPA in July of 2010 with regard to RM&E: *“BPA should set an overall budget cap on the Direct Fish and Wildlife Program expenditures for the duration of the Bi-Op. Such a cap will require BPA and the Council to reduce expenditures in Research, Monitoring and Evaluation (RM&E) in order to fund new project proposals. This will set clear program expectations and send a strong signal to program managers that they must prioritize RM&E costs. It should make the program more efficient and effective, by hopefully spending ratepayer funds in ways that result in real improvements in fish and wildlife productivity and survival”*

We have been encouraged by the activity at the Council and the Independent Scientific Review Group over the last year to address our concerns. The Council has responded to this request with the first thorough review of RM&E in our memory. In addition, we have worked with Northwest River Partners and the rest of the BPA customer groups to develop recommendations regarding the Group B RM&E program elements. The result of that work was provided to you in Terry Flores’ letter to you of May 24, 2011 and another letter dated June 2, 2011. We support the recommendations contained there.

As always, the focus of our effort has been to better ensure that the money being provided by our members for this program go into those areas of the highest value for fish survival. As a result, funds for RM&E programs that have run their course or do not focus on the hydro power mitigation responsibility should be redirected to more “on the ground” efforts. The RiverPartners letters are an informed attempt to do just that and needs your attention as you come to a final decision on the B Group projects.

Thank you for the opportunity to comment on this important topic.

Regards,



John D. Saven, CEO

Cc: Power Council members and staff
Steve Wright, Bonneville Power Administration
Lorri Bodi, Bonneville Power Administration