



COLUMBIA RIVER INTER-TRIBAL FISH COMMISSION

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Richard Devlin
Chair
Northwest Power and Conservation Council
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Dear Chair Devlin:

The Columbia River Inter-Tribal Fish Commission wrote to you on June 29, 2021 raising three concerns about the Council's preparation of the draft Power Plan. The draft plan attempted to address some of our concerns on siting renewable energy resources and planning for sufficient energy efficiency. We will provide more detailed comments during the review period.

We are writing now because the Council did not adequately address our concerns about your assumptions on the flexibility of the hydroelectric system to integrate renewable energy resources. We are formally requesting that the Council conduct three sensitivity studies during the public comment period so it has critical information that will inform the final plan.

Background

In our June letter we noted that

Renewable resources in combination with storage and reductions in peak demand can make things better for fish and wildlife and other tribal resources. Proper integration and siting are key to prevent these new energy resources making things worse for Columbia River salmon.

Our concern stems from the assumption that the intermittent renewable energy resources coming online will be integrated with the power system assuming only current fish requirements and the otherwise unconstrained flexibility of the hydroelectric dams and reservoirs. Stated another way, the analyses undertaken by the NPCC assume static fish constraints for the 20-year planning horizon of the Power Plan. At no time in the history of the Northwest Power Act have fish constraints remained static for a 20-year period. Moreover, given the dire condition of many salmon populations, it is highly likely that fish constraints will be modified within this upcoming 20-year period. We ask that the Council consider a range of fish constraints in its analysis of the region's energy future and make a fully informed decision in adopting the Plans requirements.

The draft Power Plan contains some general statements about studies that will be conducted sometime next year. However, there are no commitments regarding the types of studies or whether the Council would reopen the Power Plan or Fish and Wildlife Program based on the results. The approach in the draft plan is not sufficient.

For 40 years, the Council has been a skilled practitioner of a risk-management approach to power planning. Kai Lee's paper *The Path Along the Ridge* outlined a simple rationale for rejecting simple projections of load growth and other key parameters in power planning: "There are no facts about the future, but it is widely believed to be uncertain and risky." In its first power plan, the Council determined that, instead of making simple, deterministic assumptions about an uncertain future, the plan should identify a variety of scenarios and strategies that can work across the full spectrum of possibilities.

The assumption that river operations will be static over the coming 20 years is akin to assuming straight-line energy demand into the future: it's a convenient assumption but almost certainly mistaken. It simply ignores the prospect that climate change and its impacts on ocean conditions, water temperature, amount and timing of runoff, and other factors are likely to have on salmon populations.

Moreover, the draft plan describes unprecedented effects — conditions that simply have never been considered in prior fish and wildlife program amendment processes, Endangered Species Act and Clean Water Act proceedings, or litigation. As the draft plan describes it, as renewable energy development increases dramatically, swings in river flows and reservoir levels are likely to be stark — much more dramatic than has been the case under current river operations. Considering this, existing fish protections are being and will continue to be reconsidered. The future increases and decreases in river flows that the draft plan assumes are likely to have a much harsher effect on migrating fish than historical operations.

Putting in place an energy development strategy that assumes, and implicitly accepts, that energy development can ignore these effects will simply set up the strategy for failure. As fish stocks absorb the impacts of these unprecedented fluctuations, hydropower operations are likely to be thrown back into the ESA and litigation forums that the region has been trying to manage its way out of for 30 years. By failing to consider future hydro system constraints, the draft Energy Plan implicitly assumes that there are no costs associated with such uses of the dams. This sends a false signal to energy planners.

The way to account for these effects in developing a sensible energy strategy is to analyze a range of river operations scenarios that respond to the challenges that fish are likely to face, and review energy options that make sense across the range. The Council, the progenitor of risk-based planning, is positioned to bring these techniques to bear in this new era of unprecedented uncertainty.

Requested Studies

We respectfully request that the Council conduct three sensitivity studies prior to the completion of the 8th Power Plan:

1. A study that assumes the hydro system operations that are described in the injunctive relief agreed to by the United States, Oregon, the Nez Perce Tribe, and National Wildlife Federation et al. in the current *NWF v. NMFS* litigation. Regardless of whether Judge Simon grants their requested relief, increased spill levels and decreases in “zero generation” are the types of operations that will be pursued and further considered by the region.
2. Combined with increased spill levels, a study that limits daily fluctuations in Columbia and Snake river flows between April 1 and August 31 such that the differences between highest and lowest hourly flow levels measured in any day at appropriate control points such as The Dalles Dam and Lower Granite Dam is no more than 20 percent and during the remainder of the year the difference is no greater than 35 percent.
3. A study of the effects of removing the four lower Snake River dams and what future energy resources might be added to address the losses of associated capacity and energy. The Washington Stakeholder report posed a similar question more than a year ago. CRITFC’s draft Energy Vision would also benefit from a refined analysis using the Council’s GENESYS model, particularly since that model was designed to assess the adequacy of the power supply for the region.

We are willing to assist Council staff to develop more specifics, including ideas for computer code that could be adapted for the Council’s modeling for these requested studies. If you have questions or need additional information, please contact Rob Lothrop, lotr@critfc.org.

Sincerely,



Aja K. DeCoteau
Interim Executive Director

Cc: NPCC Members