

1 **NORTHWEST PUBLIC POWER ASSOCIATION**

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3 **18-06 Archived Resolution**

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5 **SUPPORT FOR AVOIDING “COST CREEP” IN FISH FUNDING**

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7 The Northwest Public Power Association commends BPA for  
8 recognizing that “cost creep” in fish management agencies has the  
9 potential to undermine BPA’s competitiveness in the electricity market.  
10 It is in the best interest of the agency, the customers and the region to  
11 have certainty attached to the fish and wildlife costs of the Federal Based  
12 Columbia River System. This is especially true at a time when energy  
13 costs are soaring.

14 The unmet Memorandum of Agreement (MOA) among federal  
15 resource agencies does not provide a specific “cap” on fish costs as the  
16 first MOA did; it merely establishes guidelines for future agency actions.  
17 The absence of a true “cap,” compounded by “cost creep” threatens to  
18 expose BPA customers to unacceptable financial uncertainty and risk.  
19 Additional “cost creep” is likely if and when decisions by other Federal  
20 agencies require BPA to make changes in river configuration. A number  
21 of other measures relating to spills and flows have already been pushed  
22 upon BPA by other Federal agencies. Individually these measures are  
23 small in scale, but uncertain conditions reinforce the need for a cost cap  
24 on future fish and wildlife costs.

25 The region’s fish and wildlife services, funded by BPA’s customers  
26 over the last two decades, have a dismal track record. This lack of  
27 progress, in large part, has been due to strategies and solutions based on  
28 weak or non-existent science, and a lack of accountability by the parties  
29 proposing and executing the strategies. BPA customers do not want to  
30 assume open-ended fish liability that is further complicated by the threat  
31 of “cost creep.” NWPPA supports a cap on fish costs giving BPA  
32 customers some comfort in knowing the maximum level of cost  
33 associated with fish recovery efforts and believes that future costs should  
34 be shared among all responsible parties.

35 In light of these concerns over increased fish costs, NWPPA urges  
36 that BPA, DOE and Congress work to ensure that “cost creep” is  
37 minimal, fish funding is capped and costs should be shared by all  
38 responsible parties.

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40 **NORTHWEST PUBLIC POWER ASSOCIATION**

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42 Origination Date: 1999

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44 Revised: 2005

45 Archived: