

December 11, 2023

The Honorable Jennifer Granholm  
Secretary, U.S. Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585

Dear Secretary Granholm:

We write to you knowing that you are a hydropower supporter. During your interview with National Hydropower Association CEO Malcolm Woolf on Aug. 24, 2022, to commemorate National Hydropower Day, you gave your assessment of the value of hydropower, noting, “Most other energy resources simply can’t do what hydropower can do.” You also stated, “Hydropower is cheaper and cleaner. [It] means lower bills, means better health...Hydropower is a force multiplier for adding more clean energy to the grid.”

It is in this context that we write to you today, as **the future of the Pacific Northwest’s hydropower system and the benefits it provides are at risk** due to a Draft Mediated Agreement (Draft Agreement) between the U.S. Government and plaintiffs to the Federal Columbia River Power System (FCRPS) litigation.

If ratified, the Draft Agreement, entitled “Commitments in Support of the Columbia Basin Restoration Initiative and in Partnership with the Six Sovereigns,” would have far-reaching and negative impacts on the ability of the region to meet its clean energy targets, on the ability of regional consumer-owned utilities to maintain affordable electricity rates, and on the reliability of the Western electric grid.

NWPPA is comprised of over 150 consumer-owned electric utilities in the Western United States and British Columbia serving over 4.5 million electricity customers. We are rural electric cooperatives, municipalities, and public utility districts governed by the people we serve and located in the states of Alaska, California, Colorado, Idaho, Montana, Nevada, Oregon, Utah, Washington, and Wyoming. Many of NWPPA’s members rely on hydropower marketed by the Bonneville Power Administration (BPA) and the Western Area Power Administration. Others own licenses to operate hydroelectric power plants.

As currently written, the Draft Agreement gives explicit purview over critical FCRPS-related processes to anti-hydropower parties who have advocated for the removal of the lower Snake River dams (LSRD). One of these parties has called for the removal of all dams in the Columbia River Basin. Unfathomably, the Draft Agreement does not guarantee participation in these processes to the region’s utilities which depend on the affordable, reliable, carbon-free power the dams provide. **The agreement also fails to cap the financial exposure of BPA and its customers from increased costs that could arise from provisions in the Draft Agreement.**

The previous point is critical, because the Draft Agreement commits the U.S. Government to potentially billions of dollars in energy and fish and wildlife programs. If these commitments fail to be appropriated by Congress, the financial burden may fall on BPA and its power customers. Because BPA receives all its funding through power and transmission sales, any increase in BPA's costs will be felt directly and dramatically by our not-for-profit consumer-owned utility members and the communities they serve.

Approximately 25% of residents in the Western U.S. qualify as energy-burdened. NWPPA's membership, serving largely rural communities, has an even higher percentage of economically distressed customers, so this matter is of the utmost importance to our members.

Another critical issue is the Draft Agreement's treatment of the LSRD. The LSRD can provide over 3,000 megawatts of non-carbon emitting, renewable peaking capacity which is critical to decarbonization efforts and electric grid reliability. The Draft Agreement's requirement for the US Army Corps of Engineers (Corps) to conduct feasibility studies for the removal of the LSRD is in direct contravention of the Biden-Harris administration's own commitment to reducing greenhouse gas emissions. The requirement also circumvents traditional congressional oversight. Authorizing these types of Corps' studies is under the purview of Congress as part of the Water Resources Development Act.

As you have noted, wind and solar are not comparable replacement alternatives for hydropower. A [2022 study](#) showed it takes 5 megawatts of wind, solar, and batteries to replace one megawatt of hydropower capacity provided by the LSRD in a zero-carbon future. **Eliminating the LSRD is equivalent to setting the region back five years in its decarbonization objectives**, even with the most optimistic of projections for a clean energy buildout. This potential setback is critical because the nation is already decades behind in achieving the Biden-Harris administration's net-zero objectives.

NWPPA also has serious concerns with the secretive process by which the Draft Agreement was developed. The federal electric power and transmission system and its impact on the regional economy is complex. It is inexplicable that the negotiations between the U.S. Government and the Six Sovereigns completely excluded the utilities that are responsible for providing a critical service to millions of customers.

For the reasons stated above, NWPPA stands in strong opposition to the Draft Agreement. We urge you to intervene on behalf of consumer-owned electric utilities and all stakeholders of the FCRPS.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kurt Miller', with a stylized flourish at the end.

Kurt Miller,  
Executive Director, NWPPA

Cc: Northwest congressional delegation