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Northwest Public Power Association
Resolution 2023~~23~~24-01
Energy Efficiency

Background

Energy efficiency helps utilities meet challenges of increased energy demand, costs, and regulation. Energy efficiency gains help offset increased costs associated with market power purchases, construction or acquisition of additional generating resources, and increased costs related to state and federal renewable portfolio standards, and potential impacts of climate change legislation.

Energy use in existing buildings and structures represents 40% of energy nationwide and accounts for 38% of global emissions. Energy efficiency investments, improvements in building materials, and grid-interactive appliances and buildings can all help reduce emissions associated with energy use in buildings and structures. Innovative tools can provide other incentives for building owners and utilities to invest in energy efficiency. States and utilities are increasingly leveraging the decarbonization of the electric sector to reduce the carbon footprint of buildings as well.

Timely implementation of robust energy efficiency standards for buildings nationwide would reduce greenhouse gas emissions, improve air quality, and save energy for electric consumers. Energy efficiency technologies, applications, and building standards can create jobs, which benefit local economies. New investments and incentives for energy efficiency help to raise awareness of the benefits of energy efficiency, increase consumer installations and savings, and create demand for and development of additional technologies that support energy independence.

NWPPA's Position

- NWPPA urges Congress to support all cost-effective, technically feasible, and achievable energy efficiency measures, including incentives for building electrification.
- NWPPA supports training programs that build an energy efficiency workforce for the future.
- NWPPA supports a coordinated effort at all levels of government to inform the public about the benefits of electrification and cost-effective energy efficiency.
- NWPPA supports national model building codes and appliance standards.

- NWPPA believes that national model building standards must be flexible enough to account for variations among regions in the country with regard to building materials and available technologies.
- NWPPA urges Congress to create a model national building standards program that would not pre-empt more stringent state codes that are in effect.

Origination Date: 2009. Revised in 2011, 2012, 2017,2018, 2021, and 2023.

Northwest Public Power Association
Resolution 2023~~23~~24-05
In Support of Local Decision-Making in Energy Policy and Regulation

Background

Current federal policy discussions on issues from transmission cost allocation to incentivizing new generation to integration of distributed energy resources (DERs) highlight significant issues for locally-controlled public utility systems. Many of the solutions offered to address these challenges involve ceding a degree of the local control that is the cornerstone of the public power models.

Regional energy markets represent one potential means to foster efficient variable energy integration by sharing generating resources among multiple Balancing Authorities. However, regional energy markets also raise issues regarding: 1) appropriate governance; 2) regulatory complexity; 3) opaque and potentially large costs; and 4) a loss of customized solutions, accountability, and local decision-making.

NWPPA's Position

- NWPPA supports local utility board decisions regarding solutions that meet the needs of the local entity.
- NWPPA also supports diversified portfolios of fuel types for electric generation, including carbon-free, variable, or distributed resources.
- NWPPA supports the principles of cost causation and opposes policies that assign costs to broadly defined "beneficiaries" without their consent.
- In exploring and evaluating potential market-based options, NWPPA supports the principles of voluntary participation and structured designs that support the public power business model, which focuses on keeping costs low to the consumer and preserving local decision-making.
- NWPPA supports: 1) governance that does not increase FERC or other federal jurisdiction over consumer-owned utility operations; 2) voluntary participation in markets; 3) retention of local decision-making; and 4) protection of the ability to enter into long-term contracts, and of public power's mission to deliver reliable electric service that is cost-effective.

Origination Date: 2011 and 2012. Revised 2017, 2018, 2020, and 2023.

Northwest Public Power Association
Resolution 20~~23~~24-06
Opposition to Changing the Role and Rates of the Power Marketing Administrations

Background

Congress and the Administration occasionally call for the sale of the federal power marketing administrations (PMAs), require that the rates for PMA power be increased to reach "market" rates, or attempt to use the PMAs as tools to accomplish broader policy objectives.

Arguments in favor of these approaches often state that the PMAs are being subsidized by taxpayers. This assertion is simply not true. PMA customers repay, with interest, the capital costs of the federal hydropower facilities whose output is marketed by the PMAs. The operations and maintenance costs of these projects are paid for by the customers. Any sale, move to market rates, or expansion of the PMAs' mission would result in increased electric rates for PMA customers, which could seriously disrupt the economies of certain regions. As such, PMA customers are paramount stakeholders in any PMA policy proposal.

Budget proposals to sell the PMAs or their assets and past efforts by the Department of Energy to limit the independence, redefine the mission, or ignore regional differences have threatened to be costly and disruptive to the PMAs and their customers. While widely rejected by Congress and PMA customers, these policy themes continue to surface and create uncertainty for customers.

NWPPA's Position

- NWPPA supports maintaining the historic mission of the PMAs to distribute federal hydropower at cost-based rates with preference to public power entities.
- NWPPA supports a customer driven, bottom-up approach to any changes in PMA policy.
- NWPPA supports minimizing costs to public power electric utility customers and opposes any proposals to sell the PMAs, or their assets, or move to market rates.
- NWPPA supports and will protect the "Preference Clause" and the rights of preference utilities in all circumstances.

Origination Date: 1997 – Revised: March 2005 – Archived: 2006 – Re-Activated: 2011 and modified in 2012, 2014, 2015, 2017, and 2018.

Northwest Public Power Association
Resolution 20~~23~~24-07
Principles for Greenhouse Gas Reduction from the Electric Sector

Background

NWPPA members support environmental stewardship and in general, the reduction of greenhouse gases (GHG). As Congress and the Executive Branch pursue efforts to reduce GHGs, NWPPA members want to ensure that such reductions are technically feasible and economically workable for electric utilities.

NWPPA supports goals to address environmental impacts of GHG emissions. The methods used to reach these goals should reflect physical realities of the electric grid and financial abilities of local communities to succeed. In some parts of the West, renewable power is readily available yet these variable sources (such as wind and solar) must be connected and integrated to the grid that relies on dispatchable resources (such as hydropower, natural gas, or coal). In other parts of the country, such as Alaska, access to basic infrastructure is limited and energy choices are significantly constrained. Federal policymakers should refrain from mandating technologies that may not be feasible based on a one-size fits all approach.

New laws and regulations should take into consideration the remaining useful life of existing resources and assets and the unnecessary economic burdens of stranded assets and the need for regional planning to ensure sustained reliability of resources. Realistic timelines and flexibility to make long-term change will ensure an effective transition.

Lawmakers must understand that the costs of environmental compliance are passed on to local consumers. In some cases, particularly rural and remote areas, federal environmental regulations can drive the cost of electricity above what a local economy can reasonably afford.

NWPPA's Position

- NWPPA supports policies that provide utilities with time and flexibility to meet GHG reduction targets based on economics and reasonable alternatives in a manner that balances regulatory goals with economic constraints of rural and remote communities.
- NWPPA supports policies under the Clean Air Act that allow states to set performance standards for utilities and to establish a system of emissions reduction providing compliance flexibility.
- NWPPA cautions against one-size-fits-all mandates, inflexible requirements, or disproportionate fees and costs.

- NWPPA supports policies that provide utilities with time and assistance to mitigate reliability impacts, and to consider the costs of compliance to electric consumers.

Origination Date: 2011, 2012, 2017, 2018, 2019 and 2021.

Northwest Public Power Association
Resolution 20~~23~~24-08
Support for Consumer-Owned Utility Financing Options

Background

Tax-exempt financing is the cornerstone of public infrastructure programs and an important resource for public power systems. The ability to issue these bonds allows communities to finance the furnishing of necessary local public services, such as electricity and its generation, water, waste treatment, and advanced communications. The interest from these bonds is exempt from federal taxation, which creates a market for the otherwise low-yield investment instruments and allows for low-cost financing of local infrastructure projects.

A fundamental principle of tax-exempt financing is the ability of states and local governments to determine what services are needed to serve their citizens and to finance such projects free from federal taxation. The historic exclusion of interest on state and local obligations from federal gross income, based on the tenets of federalism, was memorialized over a century ago in the Internal Revenue Code of 1913. Such services include the provision of electricity for those states and local governments that have accepted this responsibility. The Congress and the Administration should support this critical financing tool when job creation and infrastructure investment, including those yielding environmental benefit, are so dependent upon its availability.

For rural electric cooperatives, USDA's Rural Utilities Service (RUS) administers programs that provide much-needed infrastructure and infrastructure improvements to rural communities. These include water and waste treatment, electric power, and telecommunications services. All these services play a critical role in helping to expand economic opportunities and improve the quality of life for rural residents.

Utilities programs connect rural residents to the global economy by increasing access to broadband and telecommunications services, funding sustainable renewable energy development and conservation, financing reliable and affordable electric systems, working to integrate electric smart grid technologies, and developing reliable and affordable rural water and wastewater systems.

In light of the need to finance significant additions to the electricity production and delivery infrastructure, as well as the need for employment and new jobs, Congress should preserve cooperative electric utilities' access to federally guaranteed loans from the RUS, including making such loans available for repricing at current market rates.

To further enable public power's ability and flexibility to issue tax-exempt bonds, the ability to issue advance refunding bonds should be restored.

NWPPA's Position

- NWPPA supports the continued ability of public power systems, as units of local government, to issue tax-exempt bonds.

- NWPPA opposes any proposals that would unduly restrict, adversely alter, or eliminate public power's use of tax-exempt bonds to serve its communities or change the ability of certain investors to claim the exemption.

- NWPPA supports restoring the ability to advance refund tax-exempt municipal bonds.

- NWPPA supports the RUS and its mission of enabling the building and maintaining of essential electric infrastructure through the Electric Loan Program.

- NWPPA supports proposals that would allow repricing of RUS loans at current market rates.

- For RUS to remain a strong partner with eligible entities, NWPPA urges Congress to provide sufficient RUS loan levels and RUS lending for a full complement of generation including baseload, transmission, and distribution projects, and to make such loans eligible for refinancing.

- NWPPA urges RUS to provide efficient loan processing.

Origination Date: 1997, Revised 2005 and 2017, Archived in 2011 as (11-06), Revised and Updated 2013, 2018, 2021, 2022, and 2023.

Northwest Public Power Association
Resolution 20~~23~~24-11
Urging Consideration of Economic Impacts of the Endangered Species Act

Background

The Endangered Species Act (ESA) was enacted by Congress in 1973 as a law intended to protect fish, wildlife and plant species from extinction. The ESA is administered by the U.S. Fish and Wildlife Service within the Department of Interior and the National Marine Fisheries Service within the Department of Commerce. Plant and animal species protected under the ESA are categorized as either "endangered" or "threatened" based on risk of extinction.

The ESA expired in 1992, but Congress has continued implementation of its principles through annual legislative appropriations. There are more than 1600 species listed as threatened or endangered in the United States.

Implementation of the ESA is important to the electric utility industry when energy production, transmission or distribution impacts animal or plant habitat or the species themselves. Electric utilities must obtain permits, licenses, easements and rights-of-ways in order to serve customers. These actions trigger ESA compliance, which can delay or require revision or denial of the planned activity.

NWPPA's Position

- NWPPA supports the ESA's goal of preserving species that are endangered or threatened.
- NWPPA believes any legislation or administrative rule implementing the ESA should consider the economic impact on electric utilities, and the need to protect reliability of the electric system and public safety.
- NWPPA supports implementation of the ESA in a manner that:
    - Adopts voluntary conservation efforts and habitat conservation plans that allow for reasonable economic activity as the preferred means of species protection, including safe harbor agreements and "no surprises" provisions;
    - Adopts increased tribal, state and local involvement, including voluntary cooperative management agreements for listed species, and improved consultation procedures for tribal, state and local efforts;
    - Relies on an open and sound decision-making process, including requiring public availability of information as a part of the notice and comment process;

  - Relies on scientific information that is current, accurate and as thorough as possible; and
  - Designates critical habitat only where essential physical or biological features for species are found to occur and a designation of critical habitat is essential for the conservation of the species.
- NWPPA supports improvements to the ESA that:
  - Clarify the scope and application of Section 4(d) Rules, including consideration of a species-specific approach and improvements in Recovery Planning that includes timelines for recovery;
  - Revise the listing, delisting (including changes to criteria), and petitions process, including notification to the states to provide for greater state involvement in the process; and
  - Ensure equal access to courts by parties asserting an economic or social interest and limit recovery of legal fees.

Origination Date: 1997. Revised in 2005 – Proposed to Archive in 2008 (Res. 32-08)
Rewritten for Active Status: 2014; Revised in 2015, 2016, 2017, 2018, 2020, 2021, 2022, and 2023.

Northwest Public Power Association
Resolution 20~~23~~24-12
In Support of Improved Efforts, by Utilities and the Federal Government, to Respond to Natural Disasters

Background

Each year, between 100 and 200 federal natural disasters are declared. Federal statistics show that the frequency and severity of natural disasters are increasing. According to the National Oceanic and Atmospheric Administration (NOAA), the United States suffered natural disasters for a total loss of $89.5 billion in 2020. Nearly every area of the country has been touched by hurricanes, flooding, wildfires, and ice storms. These events threaten loss of life and property, both from the direct impact and the often-extended periods before electric service can be restored, disaster assistance provided, and facilities and personal property rebuilt.

As community-owned resources, public power utilities are committed to improving the resiliency of their systems, responding expeditiously to disasters, and restoring service as quickly as possible. Public power utilities also help each other—through the provision of mutual aid by providing crew and equipment to repair both neighboring and distant utilities.

Recent experience underscores the value of mutual aid and federal disaster assistance, but also highlights areas where improvements can occur, including:

- Expand voluntary participation in, and coordination of, mutual aid efforts;
- Improve administration of FEMA grants to reimburse utilities, which can in turn expedite payments to those utilities that have provided mutual aid; and
- Reform federal disaster assistance programs to facilitate greater focus on disaster prevention, staging, system resiliency, program efficiency, and improved oversight.

NWPPA's Position

- NWPPA supports action by Congress to reform federal disaster assistance programs to enable public power utilities to use federal funds for disaster prevention and system resiliency investments, expedite federal payments to utilities for both direct disaster responses and mutual aid payments, and provide adequate federal funding for disaster response.

Origination Date: 2018

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Northwest Public Power Association
Resolution 20~~23~~24-13
Support for Federal Policies to Combat and Prevent Catastrophic Wildfires

Background

Fires in the West have had a devastating impact on natural resources, property, and lives—including public power facilities and employees. Generating units, transmission and distribution lines, communications equipment, and utility buildings have been adversely affected by recent fires. The significant carbon emissions of fires – from burning vegetation and damaged trees left to decay – also undermine utility efforts to reduce greenhouse gas emissions. Wildfire affects every state in the NWPPA footprint, with more than 10 million acres consumed by wildfire in 2020, followed by more than 7 million acres burned in 2021 and about 7.5 million acres burned in 2022.

The Departments of Agriculture and Interior have the responsibility under federal law to ensure the health of federal forest and range land. Yet, there are numerous stands of timber and range land that suffer from disease or bug infestation. Once a fire is started where there is an abundance of dry or dead natural fuel, consumer-owned utilities are subject to infrastructure destruction as well as reliability, personnel and financial risk related to wildfires on federal lands. And, in the aftermath of a fire there is a large volume of the affected timber, as well as other hazardous fuels, that remain on federal lands. These fuels create additional fire hazards on federal lands unless they are removed. Federal laws prohibiting the export of unprocessed timber from federal lands in the Western United States further exacerbate the challenge of removing hazardous materials from these lands.

NWPPA Position:

- NWPPA supports swift enactment of legislation, or regulatory action, to establish aggressive management of forests where electric infrastructure is also nearby or present.
- NWPPA supports the Department of Energy's Grid Resilience and Innovation Partnerships (GRIP) matching grant program for grid infrastructure protection and other activities to reduce the threat of wildfire in rural areas.
- NWPPA supports changes in law to reduce constraints on the ability to export timber from federal lands to support prevention and mitigation of wildfire and improve forest health.

- NWPPA supports federal assistance to move burned trees from areas impacted by wildfire to mills where the timber can be processed in order to reduce hazardous fuels buildup on the forest floor.

Origination Date: 2016. Revised 2017, 2019, 2020, 2021, 2022, and 2023.

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Northwest Public Power Association
Resolution 20~~23~~24-15
Public Power Support of Electric Vehicle Policies

Background

Community-owned utilities are investing in transportation electrification, including electric vehicle (EV) adoption and deployment. EVs offer an environmentally beneficial source of load growth, along with managed charging, and an opportunity to demonstrate our environmental stewardship. In some areas of the country, EVs are playing an increasingly integral role in grid modernization and resilience as a distributed energy storage asset as our systems continue developing vehicle-to-grid solutions.

Public power systems are ideally positioned to partner with the auto industry, EV owners, municipal and private vehicle fleets, car sharing companies, charging networks/developers and the communities they serve to offer products and services encouraging transportation electrification. Many public power systems have found that investments in charging infrastructure, customer education, and tailored rates and incentives are key to helping customers adopt electric transport. EV adoption, in turn, fueled by clean, affordable, and reliable public power benefits entire communities beyond drivers and fleet operators of EVs. These investments and the community benefits are enhanced by continued support for EVs at the federal level.

Federal policies determine whether the benefits of transportation electrification reach all the communities served by public power nationwide. Federal tax credits provide rebates to buyers that can offset the higher upfront cost of these vehicles.

The National Highway Traffic Safety Administration (NHTSA) and Environmental Protection Agency (EPA) jointly regulate tailpipe emissions and fuel economy standards. However, the State of California holds an exclusive right under the Clean Air Act to set its own emissions rules, which 13 other states have chosen to follow. These standards drive deployment of EVs. Additionally, California, Washington, and Oregon have banned the sale of new gas and diesel-powered vehicles starting in 2035.

NWPPA's Position

- NWPPA supports federal policies that incentivize production and deployment of electric vehicles and charging infrastructure.
- NWPPA supports strengthening federal incentives for EV adoption.

- NWPPA supports local utility board decision-making authority regarding adoption of EV programs that meet the goals of the local entity.
- NWPPA opposes policies that eliminate or weaken EV incentives or pose new barriers to EV adoption. EV owners may be required to pay into a federal highway fund, but not more than an equitable share.

Origination Date: 2018. Revised: 2020, 2021, 2022, and 2023.

Northwest Public Power Association
Resolution 2024~~3~~-09
Safeguarding Local Control – FCC & Pole Attachments

Background

Public power electric utilities, which include electric cooperatives, municipals, and public/people's utility districts, are essential service providers that maintain and manage facilities and infrastructure critical to the continuity of electric power system operations and to the delivery of electric power to consumers and businesses. Electric utility infrastructure and facilities incorporate electrified components and should only be maintained by qualified electric utility personnel who possess significant training in electrical equipment and infrastructure.

While public power utilities own and manage the utility infrastructure within their territories, other entities frequently seek access to attach non-electric utility equipment and cables to electric utility poles. Public power utilities support efforts to expand technology such as broadband or 5G to underserved areas and are often service providers themselves. In other cases, public power utilities willingly negotiate and coordinate with telecommunications companies when those companies submit applications for pole attachments to utility-owned poles in the interest of supporting broadband or other telecommunications deployment.

Some telecommunication providers have cited pole attachment requirements and fees as an impediment to broadband deployment. Many public power utilities are situated in states or localities that permit pole attachment fees that reflect the costs associated with readying and attaching third-party facilities to existing poles. However, telecommunications companies have successfully lobbied the Federal Communications Commission (FCC) to mandate the fees for attachments on public power poles despite an exemption to FCC regulation for all consumer-owned utilities under federal law. If approved through rulemaking, t~~T~~he FCC's fees would be a financial hardship for public power utilities, requiring public power utility customers to subsidize for-profit third-party company broadband pole attachments.

Further, attaching entities have been known to install cables, ground conductors, or other devices to public power electric utility facilities without the utility's knowledge that can endanger the integrity of the electric distribution system and the electrically trained professionals who maintain the electric facilities. Placing additional attachments on electric facility structures adds weight and bulk that can exceed original structural design criteria and can result in electric facility failure when combined with wind, ice, snow and/or snow loadings.

It is critical for electric system integrity that each pole be evaluated for suitability for attachment by trained electric utility personnel for public safety and electric system reliability.

NWPPA's Position

- NWPPA supports public power utilities' authority to manage all matters, including electric utility rights-of-way and fees, related to attachments to poles and all other electric power system equipment and facilities owned, leased and/or operated by the public power utilities.
- NWPPA opposes any legislation or regulation that would preempt local utility, state, or local authority on this issue.
- NWPPA strongly supports legislation or regulation that would reverse the FCC's incursions into local control of utility infrastructure, including their imposition of deadlines to complete various steps in the pole attachment review process (often called "shot clocks") and their push for automatic approval of a carrier's application if the utility fails to meet a deadline (often called "deemed approved"). These requirements undermine a thorough review, putting electric utility personnel, the public and the electric infrastructure at risk for safety or reliability.

Origination Date: 2018. Revised 2021 and 2023.

Sponsors: Northern California Power Agency

Northwest Public Power Association

Resolution 2024~~3~~-17 ~~(proposed)~~

Refundable Elective~~Direct~~ Pay Tax Credits For Consumer-Owned Utilities

Background

After years of effort, consumer-owned utilities secured access to the value of energy tax credits through the Inflation Reduction Act. The new law allows tax-exempt entities to claim various energy-related tax credits as a refundable elective ~~direct~~ payment tax credit.

In addition to the fundamental question of whether a particular facility or asset qualifies for an energy tax credit, access to refundable elective ~~direct~~ pay tax credits and the value of the underlying tax credits will depend on a number of additional factors, including domestic content rules, wage and apprenticeship requirements, the location of the facility in certain energy communities, and the extent to which the facility is financed with tax-exempt debt.

The regulatory authority granted to the Department of Treasury and Internal Revenue Service in implementing the new law is quite broad. This breadth of authority could be used to simplify compliance with these multiple layers of requirements. Likewise, rules and regulations could be drafted to allow flexibility in the use of this new tool. Conversely, this authority could be used to add additional complexity to an already complicated regime and decrease flexibility. Complexity and inflexibility will add millions of dollars of cost to large projects and could prevent smaller projects from advancing at all. This will hurt consumer-owned utilities' ability to economically own and operate tax creditable facilities, including wind, solar, hydropower, nuclear, carbon capture, and energy storage facilities—and will require engagement with a third party to construct such facilities.

Further, the new law protects refundable elective~~direct~~ pay tax credits from sequestration due to the Budget Control Act—the sequestration responsible for cutting payments to Build America

Bonds issuers today. However, the law does not protect refundable ~~direct~~ elective pay tax credits from sequestration resulting from the Statutory Pay-as-You-Go Act. While Congress has not allowed "PAYGO" sequestration cuts to take effect in the past, it has yet to definitely wipe the current "PAYGO" scorecard clean, leaving refundable direct pay tax credit payments and other mandatory spending programs vulnerable to cuts after January 2025 until September 2031.

NWPPA's Position

NWPPA urges the Department of Treasury and Internal Revenue Service (IRS) to work to simplify the registration and compliance process and minimize costs associated with navigating the multiple layers of requirements for qualifying for, and calculating the value of, refundable elective ~~direct~~ pay energy tax credits, which will be essential to maintaining critical base-load generation and spurring investment in the future power supply needed to fuel our nation's economy; and

NWPPA urges the Department of Treasury and IRS to work to ensure that rules and regulations provide flexibility in implementing refundable elective ~~direct~~ pay tax credits to allow for innovation and evolution in the use of this new tool; and

NWPPA urges Congress to remove the threat of statutory Pay-As-You-Go Act sequestration from refundable elective ~~direct~~ pay tax credits.

Origination Date: 2023.

Northwest Public Power Association

Proposed Resolution ~~2023~~2024-18

Federal Incentives for Utility-Scale Hydrogen Projects

Background

Demand is building for hydrogen as heavy industrial sectors seek practical solutions for decarbonization amid growing environmental demands from customers, governments, and financial players. In addition, interest in hydrogen is growing within the utility sector in areas such as generation, energy storage, grid balancing, and transportation. In this regard, electric utilities can leverage surplus renewable energy to produce hydrogen, facilitate clean energy integration, and use hydrogen as a medium for long-duration energy storage. Some utilities are also exploring the deployment of hydrogen fueling stations for the transportation sector.

A growing number of utilities, including public power utilities, are exploring and investing in hydrogen projects. Yet, hydrogen remains an expensive alternative as there are currently limited options for producing, acquiring, storing, and transporting hydrogen fuel. Hydrogen production and storage must reach sizeable commercial scale to provide operational confidence and drive down project cost. Just as solar and wind technologies benefited from various federal incentive programs, meeting state, regional, and federal clean energy goals will benefit greatly from an aggressive federal investment in hydrogen for power generation, transportation, and industrial purposes.

The $1.2 trillion Infrastructure Investment and Jobs Act (IIJA) signed in 2021 dedicated approximately $8 billion to the U.S. Department of Energy (DOE) to establish clean hydrogen programs, including a demonstration program to decrease the cost of clean hydrogen production from electrolyzers and at least four regional clean hydrogen hubs to demonstrate the production, delivery, and storage of clean hydrogen energy. This bill, along with

DOE's Hydrogen Program Plan, provides a strategic framework for the Department's hydrogen research, development, and demonstration (RD&D) activities. As DOE implements programs promoting hydrogen development, it should not only provide equal consideration for all utilities and non-utility developers, but also provide for the integration of electric generation and transportation uses of hydrogen, and hydrogen storage for non-automotive applications, and the hybrid use of renewable hydrogen and natural gas to help reduce greenhouse gas emissions. This broad approach will allow for the widespread assessment and adoptions of hydrogen use in electric generation.

Additionally, ~~last year Congress approved, and President Biden signed,~~ the Inflation Reduction Act of 2022~~. The Act~~ created a new section within the Internal Revenue Code, 45V, which establishes a clean hydrogen production tax credit (PTC) and broadens the existing investment tax credit (ITC) in section 48 to apply to hydrogen projects and standalone hydrogen storage technology. The Act also allows for direct pay and transferability of hydrogen-related tax credits. As the U.S. Treasury and Internal Revenue Service implements these tax provisions, similar to DOE, these agencies should provide equal consideration for all utilities and non-utility developers and provide for the highest level of opportunity to equitably capture the tax benefits outlined in the measure.

NWPPA's Position

- NWPPA supports federal policies to increase the research, development, and deployment of hydrogen technology for the electric utility sector, in addition to transportation and industrial uses and urges effective implementation of the hydrogen programs authorized by the Infrastructure Investment and Jobs Act.
- NWPPA urges Congress to provide equal incentives to all segments of the utility industry, including public power, in any programs to advance hydrogen deployment.

Originated: 2022. Revised 2023, 2024.

Northwest Public Power Association
Resolution ~~2023~~2024-02
~~In Support of All Hydropower as a Renewable Resource~~In Support of Hydropower's Maintaining and Expanding Hydropower's Role in the Clean Energy Transition

Background

NWPPA supports hydropower, the foundation of the Northwest region's energy supply, as a clean renewable, cost-effective, carbon-free, and safe energy resource. Multi-purpose dams conserve and manage water to meet the needs of the people and the ~~Nation's~~region's economy.

In addition to energy, hydropower provides valuable services to the electric grid ~~which support reliability and the integration of renewable resources including wind and solar through~~such as capacity, flexibility, ramping, storage, and frequency response. ~~As a carbon-free resource, hydroelectric generation reduces the need to import and burn additional fossil fuels to meet consumer demand.~~ A 2021 Hydropower Value Study from the Department of Energy~~DOE also commissioned the~~ detailed the current and prospective role of hydropower to the nation's electric grid, highlighting its valuable contributions to grid stability. and contribution of hydropower operations on the nation's electric grid. contributions of hydroelectric generation

Some of the environmental benefits associated with the Northwest's hydropower system ~~are~~includes clean air, substantial ~~production of~~ dispatchable energy ~~and not~~that supports the integration of additional wind and solar and avoided greenhouse gas emissions. ~~As a zero-carbon generation resource, hydropower will be a key resource to help meet Clean Energy Standard goals. This gives the~~ As the Northwest ~~an environmental edge unmatched elsewhere in the country where power production is largely from fossil fuels. Hydro generation~~ transitions to a cleaner electric grid, hydropower is unique in its ability to instantly increase or decrease generation ~~in maintaining~~to maintain the constant balance of generation and ~~electric demand which is necessary~~ electricity demand, reducing the need to utilize fossil fuels for ~~power system~~ reliability. ~~Existing~~ As such, hydropower ~~offers~~stands out as the ~~added benefit of avoiding the carbon~~Northwest's defining advantage in achieving greenhouse gas emission reduction goals while keeping electricity both affordable and ~~costs of bringing other new renewable sources online.~~reliable.

According to the Department of Energy (DOE), the U.S. hydropower fleet produced about 30% of the nation's renewable energy and capacity in 2022. DOE's s *2016 Hydropower Vision* report found that hydropower could grow from 101 GW to nearly 150 GW by 2050 with the right public policy support. Unfortunately, energy policy, particularly at the federal level, has dramatically favored other renewables, putting investment in new hydropower capacity as well as existing projects at risk. Recent laws have taken steps to improve hydropower's outlook – assuming effective implementation.

For example, in 2021, the Infrastructure Investments and Jobs Act (IIJA) provided $533 million in grants for investments in additional hydropower production and capital investments in grid resiliency, dam safety, and environmental improvements. In addition, the Inflation Reduction Act of 2022 (IRA) increased the existing production tax credit for hydropower, established an energy storage investment tax credit that includes pumped storage, and called for a transition to a technology-neutral Clean Electricity Production Tax Credit and Clean Electricity Investment Tax Credit in 2025. For the first time, the IRA also ensured that public power could utilize these tax incentives by enabling an elective payment for tax exempt entities, provided certain conditions are met.

While these incentives could help facilitate new hydropower generation, many existing projects are aging and need investment to continue providing the energy, environmental, and grid services the Northwest relies upon. A tax incentive for investments in dam safety and environmental improvements at existing hydropower would help keep hydropower reinvestments affordable for electric customers while reinforcing the multi-faceted benefits the projects provide. Finally, many hydropower owners are seeking legislative reform to the existing licensing process to keep their projects online or to enable development of non-powered dams and pumped storage projects.

Retaining, enhancing, modernizing and expanding the benefits of multipurpose hydropower projects can be facilitated by policy choices.

NWPPA's Position

- NWPPA supports ~~Congress recognizing~~Congress' recognition of all hydropower, including existing hydropower, as a renewable and clean energy resource.
- NWPPA supports the effective implementation of grant and tax incentive policies enacted by the IIJA and IRA to preserve and enhance our nation's hydropower system.
- NWPPA supports the explicit recognition of hydropower as a zero-carbon electric generation resource that meets the requirements of any federal clean energy tax incentive or other federal clean energy policy.
- NWPPA supports market design that values hydropower's baseload availability, flexible capacity, other ancillary services, and carbon-free attributes.
- ~~NWPPA supports explicit inclusion of hydropower as a zero-carbon electric generation resource that meets the requirements to be included in any Clean Energy Standard considered by Congress and/or the Administration.~~
- NWPPA supports maintaining federal renewable and other clean energy incentives that are equally available to hydropower and accessible to public power utilities and rural electric cooperatives.
- ~~-~~NWPPA supports ~~efforts by Congress~~legislation to ~~modernize hydropower licensing by designating Federal Energy Regulatory Commission (FERC) as the lead agency~~provide a 30% tax incentive for ~~purposes of coordinating all federal authorizations and complying~~dam safety capital investments at existing dams, with ~~the National~~

~~Environmental Policy Act.~~an elective payment provision for tax exempt entities such as public power.

- ~~NWPPA supports reducing the time required for~~reforming the hydropower licensing process ~~by better coordinating federal authorizations, adding schedule discipline, improving trial-type hearings and fact-finding, requiring agencies~~ to ~~equally consider other public purposes of a project when setting conditions, and reducing duplicative study requests and those not tied to project operations.~~
- ~~NWPPA supports hydropower regulatory reforms that require~~1) ensure mandatory license conditions and prescriptions ~~be accompanied by written rationale tied~~are tied to project effects; 2) designate FERC as the lead agency and establish a schedule for better early coordination of federal and state authorizations; 3) use existing studies to ~~each prescribed project nexus.~~ the greatest extent practicable; and 4) promote development at non-powered dams and closed-loop pumped through expedited processes.
- ~~NWPPA supports effective FERC implementation of new Federal Power Act section 36, which will encourage pre-licensing investments at existing hydropower projects by crediting them toward longer license terms.~~
- NWPPA supports federal ~~investments~~investment in advanced hydropower technologies through increased research~~, development,~~ and ~~incentives. A major opportunity for increasing hydro-system output is reducing unplanned outages and increasing hydropower's contribution to grid reliability and resiliency.~~ development funding for the Department of Energy's ~~WaterPower~~Water Power Technologies Office.
- NWPPA supports federal, state, and local efforts to enact policies that expedite the voluntary removal and redeposit of debris and sediment runoff into hydropower reservoirs as a result of frequent and extreme weather events. ~~-~~Accelerated sediment buildup can degrade water quality, accelerate the wear and tear of turbines, and reduce overall power output. ~~-~~Facilitating disposal of sediment for beneficial use on adjoining federal lands should be encouraged and streamlined.
- NWPPA opposes efforts to remove safe and productive dams that provide, or have the potential to provide, economic hydropower generation.

- Origination Date: 1997. Revised in 2011, 2012, 2014, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023 and ~~2023~~2024.

Northwest Public Power Association
Resolution 2024-03
Protecting the Bulk Electric System from Cyber and Physical Attacks

Background

NWPPA supports protecting electric infrastructure from cyber and physical attacks and its members are actively engaged in efforts to protect the electric grid from cyber and physical attacks to ensure a reliable and safe electric system.

The North American Electric Reliability Corporation (NERC) is the nation's electric reliability organization authorized by Congress and certified by the Federal Energy Regulatory Commission (FERC) to develop technical standards that are risk-based and ensure reliability – including the cyber and physical security – of the bulk electric system. NERC standards are developed with input from technical experts in all sectors of the North American utility industry and FERC approves or remands the standards for modification. Once approved, they are mandatory and enforceable. Nuclear reactors are also subject to mandatory cyber standards required by the Nuclear Regulatory Commission (NRC).

Nevertheless, Congress remains concerned that the North American electric grid is vulnerable to attack and has debated and enacted various legislative proposals to strengthen the security of the bulk electric system. In the aftermath of several high-profile cyber and ransomware attacks as well as increases in physical attacks to electric infrastructure, there has been a growing call from Congress for additional mandatory cyber and ransomware incident reporting requirements and a review of the effectiveness of existing reliability standards for the physical security of the electric grid. Attention has also focused on vulnerabilities not in the design and operation of the grid itself, but in the supply chain, where utilities have little control over manufacturing practices, the insertion of malware, or business operations of third parties.

NWPPA's Position

- NWPPA opposes measures that would undermine the process for setting reliability standards through NRC or FERC and NERC rulemaking.
- NWPPA supports using a risk-based approach to identify and set potential cybersecurity standards and is appropriately mandated to secure critical infrastructure.
- NWPPA supports addressing supply chain vulnerabilities in a way that protects utilities and other end-use consumers of products and software, rather than requiring utilities to police vendors.

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- NWPPA supports financial and technical assistance to small utilities to enhance cyber and physical security.

Origination Date: 2009. Revised in 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2021, 2022, and 2023.

Northwest Public Power Association
Resolution 2024~~3~~-04
Ensuring a Reliable Grid

Background

Providing safe, reliable electricity at a reasonable price while protecting the environment has always been a fundamental responsibility of consumer-owned, not-for-profit electric utilities.

In the years since Congress adopted mandatory and enforceable reliability standards in the Energy Policy Act of 2005 [Federal Power Act (FPA) section 215], reliability regulation has focused on a risk-based prioritization approach to standards development and auditing efforts. However, policymakers have become increasingly concerned about "resource adequacy" – the existence of sufficient capacity resources available for dispatch when needed at peak times – and about the "resilience" of the grid – the ability to maintain reliability during extreme weather or other catastrophic events and to quickly restore power in the wake of a widespread outage.

Congress has also become interested in interregional transmission, and the ability for one region to "transfer" a percentage of its load to a neighboring region to address the potential for widespread blackouts. Some proposals would also address cost allocation of transmission development costs.

NWPPA's Position

- NWPPA supports efforts to maintain and improve the reliability of the nation's Bulk Electric System (BES).
- NWPPA supports risk-based reliability standards focusing only on facilities and entities that are critical to reliability of the BES per Section 215 of the FPA.
- NWPPA supports efforts to address resource adequacy concerns that are industry-led, recognize the value and flexibility of resources such as hydropower, and incorporate regional differences and local governance.
- NWPPA urges policymakers to ensure that any new resilience policies do not adversely impact the ability of local utilities to manage their respective distribution-level facilities in a safe and cost-effective manner.
- NWPPA supports the development of appropriate regional reliability standards based upon the operating characteristics of regional power grids as defined by local and regional experts.

- NWPPA supports the industry-led standard development process and advocates for NERC's role as the lead to assure reliability of the BES.
- NWPPA urges good working relationships and consistent standard application and guidance from FERC, NERC, and regional reliability organizations, and urges reduction of unnecessary or duplicative standards and compliance documentation that does not directly impact the reliability of the BES.
- NWPPA supports a stakeholder-led process at FERC to determine where interregional transfer capacity is needed and who should bear the costs of needed development.

Origination Date: 2011. Revised in 2012, 2014, 2016, 2017, 2018, 2019, and 2023.

Northwest Public Power Association
Resolution ~~2023~~2024-10
In Support of Advanced and Small Modular Reactors

Background

Small modular reactors (SMRs) – nuclear generators under 300 MW that can be scaled to meet local needs – and advanced reactors are an important addition to the nation's energy mix. These advanced technologies can provide emissions-free baseload power and numerous other benefits and applications. Robust and consistent federal support for these first-of-a-kind and demonstration reactors is crucial to establish and commercialize this technology and to maintain our dominance in the global market for nuclear power.

~~The U.S. Department of Energy has provided funding for the accelerated development and commercialization of SMRs. An SMR project is moving through the licensing process at the Nuclear Regulatory Commission, for a reactor to be located at the Idaho National Laboratory site near Idaho Falls. The project is scheduled to connect to the grid in 2029. DOE's Advanced Reactor Demonstration Program (ARDP) funds two demonstration projects expected to be sited in the Pacific Northwest and be in operation by the end of this decade.~~

SMRs and advanced reactors can provide highly resilient power to national security and mission critical activities. Existing authorities for federal power purchase agreements (PPAs) and government policies for energy procurement could be enhanced to support a fair and level playing field for SMRs and advanced reactors. The duration of PPAs are typically limited to 10 years or less, far too short to justify the investment in a generation asset that will be commissioned to operate for 40 years or more. Complex federal budgeting rules often require federal agencies to fund the entire PPA in the first year, significantly constraining investment in power purchase contracts that would extend beyond 10 years. Further, the federal government has a role to play in de-risking early adoption of advanced reactors through funding and cost overrun insurance. ~~Robust and consistent federal support for these first-of-a-kind and demonstration reactors is crucial to establish and commercialize this technology and to maintain our dominance in the global market for nuclear power.~~ In addition, many advanced designs require high-assay, low-enriched uranium (HALEU) as fuel, which is not produced domestically in quantities to support current projects, let alone the expected market.

NWPPA's Position

- NWPPA supports legislation, programs, incentives, and initiatives that help facilitate accelerated SMR and advanced reactor development and commercialization. NWPPA

encourages continued and increasing appropriations to fund DOE programs for new reactor projects.

- NWPPA supports legislation that will modify federal power purchase parameters in support of long-term contracts beyond 10 years.
- NWPPA supports legislation to promote a secure, domestic supply of HALEU.
- NWPPA supports legislation to create a form of cost overrun insurance to address the customer risk in championing advanced reactor designs.

Origination Date: 2017. Revised 2019, 2020, 2021, 2022, ~~and~~ 2023, and 2024.

Northwest Public Power Association
Resolution 2024~~3~~-14
Vegetation Management and Fire Prevention on Rights of Way

Background

Of great concern to the electric utility industry is the timely management of vegetation growing along electric transmission and distribution lines on rights-of-way (ROW) located on federal lands. Proper vegetation management ensures reliable electric service, reduces power-line related wildfires, and safeguards electric infrastructure.

The Bureau of Land Management (BLM) and the U.S. Forest Service (Forest Service) together manage 439.3 million acres throughout the United States containing almost 90,000 miles of electrical transmission and distribution rights-of-way. Utility companies, and ultimately their customers, bear the cost of maintaining and repairing these ROWs, and suffer the reliability and financial consequences if they are not allowed timely access to federal lands to manage vegetation while the managing agencies enjoy the use of these often-improved easements at no cost. Utilities may be liable for fire damage if vegetation in or near ROWs cause fires when encountering electric lines. Utilities may be liable for fire suppression costs even when federal land managers have denied a utility's request to trim vegetation that ultimately caused the fire. Utilities that are held liable for fire damage costs can be denied future liability insurance.

BLM and the Forest Service have not consistently allowed vegetation management of ROW to be carried out on a routine or timely basis. In too many cases, utilities have found that federal land managers apply inconsistent policies to vegetation management requests.

In 2018, Congress approved legislation as part of the Omnibus Appropriations Act of 2018 (P.L. 115-141, Sec. 211, or the Act) to allow for timely and consistent approvals of utility vegetation management requests, limits on strict liability for utilities that proactively plan for vegetation management in ROWs and for removal of hazard trees, and improved cooperation between ROW operators and federal land managers. ROW owners/operators have sought to provide expertise and input into federal land management agencies' implementation of the Act.

NWPPA's Position

- NWPPA supports policies that provide electric utilities with transmission and distribution lines on ROW on federal lands with a reasonable certainty that the approving federal agency will respond in a timely and consistent manner to access and vegetation management requests.

- NWPPA supports prompt implementation of ~~new~~ the authorities granted to federal land management agencies in the Vegetation Management Act to provide guidance to electric utilities on development of vegetation management plans, to respond to vegetation management plans and requests in a consistent and timely manner, including addressing hazard trees that are located near ROWs and pose an immediate threat.
- NWPPA supports implementation of the Vegetation Management Act in a manner that provides reduced requirements and a shorter timeline for development, review and approval of operating agreements taking into consideration the financial resources of small utilities as provided for in the Act.
- NWPPA supports consistent implementation of the Act by the U.S. Forest Service and the Bureau of Land Management to lessen the workload of utilities having to develop operating plans and agreements for rights of way~~s~~ on lands managed by both agencies.
- NWPPA supports improving the administrative permitting process for operations and maintenance work needed to reduce wildfire risk. Permitting changes should include expediting routine O&M plan reviews and employing broader application of permits (and tools such as master agreements and programmatic environmental impact statements) to facilitate projects aimed at preventing wildfires.
- NWPPA supports further legislative efforts to expand opportunities for vegetation management by ROW operators to reduce the risk of wildfire ignition through power line interactions with vegetation.

Origination Date: 2016. Revised 2017, 2021, 2022, and 2023.

Northwest Public Power Association
Resolution 2024~~3~~-16
In Support of Rural Broadband Deployment and Use

Background

Approximately 72 percent of all native Americans, and 78 percent of those who live in rural areas do not have access to broadband at current federal minimum standards. This underserved population includes much of the rural, and in some cases urban areas where NWPPA members provide electric service.

The absence of high-speed broadband service limits economic development opportunities in rural areas of the United States for small businesses, or cottage industries. Learning and classwork is increasingly an online service, and unavailable for many rural students without access to sufficient broadband. In addition to the need for learning services, many rural residents also do not have access to telemedicine services leaving rural residents without emerging telemedicine access that can provide lifesaving medical consultations and diagnoses. The internet, especially at true broadband speeds can increase a sense of community connectivity and security for house-bound individuals.

Many public and consumer-owned utilities own or have access to high-capacity telecommunications networks that support their operations, monitoring and maintenance of their electric distribution systems. States have authorized various levels of authority regarding public broadband networks. Wholesale broadband authority, consumer-owned broadband networks, municipal broadband networks, and public-private partnerships help unserved or underserved rural areas gain access to internet speeds at, or greater than, current federal minimum standards.

Implementation of the broadband investment provisions in the Infrastructure Investment and Jobs Act (IIJA) will help accelerate the deployment of broadband services. Further expansion of rural broadband services may be accelerated through a broader definition of qualifying entities for state and federal assistance, and through federal legislative and administrative rules that provide broadband subsidies for rural customers, increase public-private partnerships, provide technical support and guidance or grants.

Current limitations on broadband authority, financial and technical support are barriers for communities who could otherwise enjoy the economic and social benefits of adequate access to broadband services.

NWPPA Position

- NWPPA supports efforts to obtain local, state, regional and national support for policies and legislation which support public broadband deployment, funding opportunities, awareness, customer adoption, and digital literacy.
- NWPPA supports the efforts by local, state, and federal entities to remove barriers that prevent public utilities from providing broadband services to their consumers.
- NWPPA supports rural broadband deployment initiatives at the local, state, regional, and federal level in legislative and administrative proceedings that are coordinated such that they do not compromise the safety and integrity of the electric utility infrastructure.
- NWPPA supports broadband deployment, particularly in rural underserved areas, provided that it does not create unintended cost shifts from the broadband deployment onto the electric utility.

Origination Date: 2019. Revised in 2022 and 2023.

Northwest Public Power Association
Resolution 2024~~43~~-19 ~~(Proposed)~~
Supply Chain Challenges
for Distribution Transformers and Grid Components

Background

Supply chain challenges have made it difficult for electric utilities to procure distribution transformers and other critical grid components needed to complete maintenance and infrastructure rehabilitation projects as well as expand electric service to meet growing customer demand and increasing electrification. These delays in acquiring critical components have had a detrimental impact on utilities' operations, including reducing utilities' ability to provide reliable electric service and restore power after an outage from severe storms, other natural disasters, or malicious damage.

In June 2022, the Biden administration announced that it would invoke the Defense Production Act (DPA) to help increase domestic production of certain clean energy technologies, including distribution transformers. Use of the DPA was intended to reduce the supply chain delays by addressing labor and materials shortages. However, deploying the authority of the DPA requires federal appropriations, and Congress failed to provide funding in the 117th Congress.

The Department of Energy (DOE) proposed a new rule in late 2022 that would require transformers manufactured or imported beginning in 2027 to have amorphous steel core components, shifting from grain-oriented electrical steel in an effort to increase efficiency and cut carbon dioxide emissions. In the short term the new DOE energy conservation standards could further exacerbate transformer production challenges and may have the effect of significantly increasing the long lead times faced by electric utilities in acquiring or replacing distribution transformers.

NWPPA's Position

- NWPPA urges Congress to provide adequate appropriations to fully deploy the Defense Production Act in order to address labor and materials shortages and otherwise accelerate domestic production of critical grid components.
- NWPPA supports a temporary DOE waiver of energy conservation standards to address the current lack of supply and long lead times in acquiring or replacing distribution transformers.

- NWPPA supports providing long-term support for all efforts that can increase domestic manufacturing of critical grid components, including distribution transformers.
- NWPPA opposes federal regulatory hurdles that would further hinder, increase costs, or cause further delays for utilities seeking to acquire distribution transformers. Likewise, NWPPA supports legislative efforts to repeal such regulatory actions.

Origination Date: 2023.

NEW
Northwest Public Power Association
Resolution 2024-20
In Support of Advancing Negotiations to Modernize the Columbia River Treaty

Background

In 1964, the U.S. and Canadian governments enacted the Columbia River Power Treaty for the joint development of power generation and flood control in the Columbia River Basin. In exchange for up-front payments for construction of Canadian storage projects, the U.S. was guaranteed predictable flood control for 60-years. In addition, the U.S. was obligated to return a negotiated amount of hydropower capacity and energy to Canada for 60 years – known as the Canadian Entitlement (CE). The Treaty gives either party the ability to terminate the power provisions after 60 years by giving 10 years' notice.

While Canada and the U.S. initiated negotiations in 2018, neither party has exercised the right to terminate the power provisions after giving 10 years' notice. It remains unclear whether negotiations will result in a rebalancing of power benefits despite decades of changes in the regional power system that have reduced the ongoing value of downstream power benefits to the U.S. by as much as 90%. In addition, assured Canadian flood control operations under the Treaty ends automatically in September 2024, requiring the U.S. to use domestic reservoirs first before "calling upon" Canada for assistance.

Today, the value of hydropower returned to Canada under the Treaty equates to about $300 million annually. Meanwhile, river users have no insight into how flood control operations will change, or be paid for, next year. Downstream non-federal hydropower operators have concerns about the unknown impacts of flood control changes on operations and dam safety. Electric utilities in the Northwest are concerned that their customers effectively end up paying for future flood control if the power provisions are not terminated – even though flood control is generally a responsibility of U.S. taxpayers. These issues are not a surprise. It has been over 10 years since a Regional Recommendation, informed by input from stakeholders, was forwarded to the U.S. State Department by the U.S. Entity in December 2013.

Congress has taken some steps to encourage action. A provision in the Infrastructure Investment and Jobs Act of 2021 establishes a new Treasury account, essentially equal to five years of the CE, to help increase bilateral transfers of renewable electric generation between

the U.S. and Canada by constructing electric power transmission facilitates. However, the activities cannot take place until after September 16, 2024 and are contingent upon the CE being reduced or terminated. In addition, the IIJA authorizes $10 million for BPA to conduct a power coordination study considering the potential hydroelectric power value to the Pacific Northwest of better coordinating the operation of hydro and water storage facilities on rivers in the U.S. and Canada.

Congress also called on the U.S. Army Corps of Engineers in the Water Resources Development Act of 2022 to conduct a study to determine the feasibility of a domestic alternative to the reliance on Canada for flood risk management. This report requires recommendations and future coordination with Congress on what funds are needed and how they will be used.

The regional electric grid is undergoing a fundamental transformation as the shift to clean generation creates new demands and opportunities, including a growing need for transmission. Modernizing the Columbia River Treaty can help the Northwest achieve its clean energy goals under various electrification scenarios by keeping hydropower's clean capacity and its flexibility to support grid reliability. Action to modernize the Columbia River Treaty is long overdue.

NWPPA's Position

- NWPPA urges the State Department and White House to successfully conclude negotiations with Canada for a better, rebalanced and modernized treaty.
- NWPPA supports timely action by the Corps of Engineers to define its flood control strategy and either pay Canada for flood control through federal appropriations or develop a domestic alternative.
- NWPPA urges the Corps of Engineers to be more transparent by providing utilities, particularly downstream dam operators, the information they need to plan for post-September 2024 flood control scenarios.
- NWPPA supports U.S. and Canadian interests working together to reduce and rebalance the CE so that funds authorized in the Infrastructure Investment and Jobs Act of 2021 can be directed to improving transmission capacity to better optimize inter-regional delivery of emission-free hydropower.
- NWPPA supports BPA working expeditiously with British Columbia, the Department of Energy, the Bureau of Reclamation, and the Mid-Columbia Public Utility Districts to conduct the $10 million power coordination study authorized by Congress in the Infrastructure Investment and Jobs Act of 2021.

Origination Date: 2024.