

**ES-1 Comments**  
**Recommendation 14**  
**Environmental portfolio standard**  
**(Renewable and energy efficiency)**

The economic impacts of any legislation must be determined and be a part of the decision.

Government meddling/incentives rarely result in progress. Montana should be working to remove barriers to progress not impeding them by adding bureaucracy that adds no value to the end product. Furthermore, this report was based on a politically correct directive which assumes there is a man-made climate crisis. While this assumption has the backing of the media and politicians it has little support from the scientific community. Hence the reporting by the media of the relative minority that support the theory.

Who determines what is "Achievable"? MEIC has a very liberal view of what is included as achievable for a BACT analysis. This would not likely be any different. This would be an expensive experiment that would end up costing Montana consumers an unprecedented amount.

Coops have enough to worry about in replacing Bonneville Power.

This result in higher energy prices to consumers.

Water producing electricity from hydroelectric dams must and should be considered renewable energy

There should be a cost/benefit analysis required. The benefits do not justify the costs using sound science. More taxes, regulations and red tape is not what will help Montana.

I'm against the 25% requirement, but I support innovative ideas.

All utilities should be required to implement 100% of their cost effective conservation resource.

please - no mandates for electric co-ops

Is the year 2025 a realistic date?

Emphasis should be on reductions of CO2 emissions.

Mandating CO-Op activity is imperative for future renewable energy viability in Montana.

The efficiency portfolio standard is an excellent tool for utilities. Can it be done for business by type and home-owners?

This is nonsense. Again, be mindful of the premise upon which this suggestion is based. Where do the consumers fit into this? Where do the research and development costs go?

Let the free market do it. Once we use up all the petroleum-based energy, the free market will force change.

Lets set realistic goals.

How do you expect small co-operatives to get the capital for investment for such projects? The rate impacts would be astronomical. You're going to force a lot of co-opertives out of existance!!

I think this is a particularly useful policy suggestion, that the state could accomplish.

However, I do not support large-scale industrial-style corporate wind farms and their accompanying transmission lines! Small distributed alternative energy systems, especially rooftop solar, have less impact on landscapes and provide plenty of jobs!

I would support higher levels of RPS, sooner.

Agree with including co-ops, but feel the window for the requirement for them needs to be extended.

Another moronic mandate!

Individuals can only do so much with this issue, we need strong and numerous government action of many forms and formats...

If renewables were so darn efficient and cheap, don't you think the utilities would already be moving that way? So it's going to cost money-passed through to the consumer.

Hydro should be considered renewable!

Look to the UN-intended consequences. Let the market do its job. Like most government involvement in an issue, it is well intentioned, but will ultimately make the situation more cumbersome and expensive. This would be OK with me as long as it's fairly enforced and ALL utilities, including co-op or REA's are made to comply.

Enlightened states don't want to buy any more coal electricity.

There may be some question whether wind turbine manufacturers can meet the demand. It may pay for Montana to get its orders in early. This recommendation by itself is a huge job.

Include all public utilities, including co-ops.

Montana already exceeds this with current production of hydro-power.

It makes sense for renewable energy production to occur at local levels and for all citizens to reap the profits.

High user costs for negligible effects on warming. We are NOT the reason the planet is getting warmer.

The renewable portfolio is driving up the cost of electricity. Until renewable sources of power can compete on a level playing field with traditional sources of power, we should not be mandating them. Consumers deserve the lowest cost of power possible.

1% increase in renewable energy in portfolio per year is not aggressive enough.

The more rules, restrictions, and standards, the bigger mess you have. This is government run amok.

I have trouble understanding why someone wants to mandate a new energy source without knowing the cost to the public. Unless of course one is in that business.

Great idea

This is not adequately ambitious, but a good start.

This sets a mandate that will increase costs to the consumer and is not supported by a good economic cost benefit analysis.

Renewable resource efforts should not attempt to direct materials (e.g. wood products) away from value-added manufacturing to energy production without an equivalent increase in raw material availability.

Since I don't work for an electrical utility I don't know how feasible it is for them to determine how much conservation is achievable. And what are the consequences for not meeting these standards?

The state government can't run utilities better than the utilities. Wind power around Judith Gap is cost effective. They'll go that way when they can make a profit.

would like action to be sooner!!!

I am not thrilled with the wind technology at present. I do not like big wind generators that kill hundreds of migrating birds. I am in favor of perfecting the wind generators before installing rather than putting up bird killers. The same with solar panels. They need to be less evasive on the environment, so smaller and more efficient.

We don't have enough land to obtain 100% of our energy from wind, solar and biomass sources.

If renewables are cost effective utilities will adopt on their own. This will only drive up energy costs and force more businesses to leave the state and the U.S. Montana's only competitive advantage is that in the past we had available cheap electricity.

NO subsidized nukes!!

Urge Rural Electric Cooperatives to accept power generated by individuals using solar and or wind., i.e., allow the meters to run backwards as regular utilities now do.

Why are we demanding that low cost hydro, a renewable, is being required to be replaced by a much higher and less reliable renewable - wind?

This concept doesn't recognize the laws of physics. Rethink the goals and time frame.

Local coops will continue to source dirty energy unless mandated to buy renewables. This in spite of comparable prices.

Allow the market for various energy sources determine usage.

AS ALREADY STATED, RENEWABLE ENERGY IS NOT RELIABLE, AFFORDABLE OR AVAILABLE IN SUFFICIENT AMOUNT IN THE FORSEEABLE FUTURE.

Excellent way to inject the market with demand.

Support, but standards should be more stringent than proposed here.

Too much of a top down approach. Need to focus more on the demand end.  
It's time for our member-owned utilities to join the movement for energy self-reliance and clean alternatives.

This is another mandate that will increase the cost to the consumer. It will likely reduce greenhouse gases, but at a cost. Will it be cost effective from the standpoint of reducing global warming. How much of an impact? Can it even be quantitated?

Regulate utility companies and break up monopolies

Let the market be the judge and rule these entities investment decisions

too slow

If there is not real motivation, action will be slow.

it will not work

Same comment at RCII 1 NO

Where will the renewable power come from? What will be the cost of this power? What will be the cost to the consumer??

Why isn't existing hydro included in this standard??

This shouldn't be just for economic development.

All you are doing is artificially driving costs up. Let the market dictate where we go in the future.

Is this even possible--How much is it going to cost the customers? Who will be paying the bill?

see above comment in regards to the economics of it all...great in theory though.

With the prices rapidly increasing, conserving natural resources is a matter the free market can handle without government mandates.

We now have techno-crats attempting to set standards which may, or "may not", be achievable. These ideas need to be joint programs with industry without mandates.

the cookie-cutter approach will not be the most efficient way to accomplish this goal

Again, increased cost to the poor and the promotion of the food-to-fuel insanity.  
go back to logging and mining ,after all we are the treasure state

Any renewable-energy systems that are financially feasible don't need to be forced upon anyone. If they must be forced upon people, it is because they are not financially viable, and that financial burden, in turn, gets shifted to the taxpayer.

Absolutely a good idea. Will probably be passed by initiative if the 2009 legislature doesn't act on something like this.

Too many requirements.

Montana does NOT need a renewable portfolio standard. The power that I receive is already renewable - hydro power from Bonneville.

only if costs can be gained in a reasonable time schedule

Develop the source first!!!!

These goals should be higher.

If any of this causes increased costs, it is unacceptable.

let the market dictate.

This Action Plan was not a Montana grassroots Plan. It was the same plan written for California and other states. Montana's poor and middle class cannot pay any more for energy.

<http://www.righttalk.com/asx/ggws.asx>

This will only serve to drive energy prices higher than its already outrageously high prices.

Setting unachievable standards is ineffective. How about we start producing the renewable energy first, then we can allocate its use.

All of our communities power sources come from a renewable resource, our power is supplied through Hydro Power.

Each time we mandate electric cooperatives, consumers lose!

How much of this Renewable energy source is available now, how much of it is speculation, what is the additional cost of production. This requirement add to the cost for the consumer. Remember Corporations do not pay taxes and they do not for the most part absorb added production cost they pass the cost on to the consumer.

The third point above "by 2010 each utility must identify..." Point one already proscribes what that must be, very few businesses are going to go any higher than what is required. Remember if we remove all Human CO2 greenhouse gas we only change the total greenhouse gases by 0.28% or the total CO2 by .117% and your reduction would be .029% not even 3/50ths of a percent. Is the cost worth it.

You are killing us! How in the heck are we supposed to pay for this. All of these alternatives are very expensive. I can't afford to fill my gas tank. Now you want me not to be able to run the blower on my heater because I can't afford the electricity? Let Wyoming manage our state portfolio AND resources. They actually have an economy and a state government that is trying to kill off the residents of their state. Can you tell? I am getting angrier the further I wade through this stuff. None of these ideas or dreams passes the litmus test of REALITY.

Every mandate and "requirement" means a hit on the consumer. This should be kept in mind with every one of these recommendations.

Don't require ASK

Are target dates feasible?

I can't say it enough. This should be done as a choice not a requirement.

Many utilities are already doing this as part of the package they offer. Why shouldn't the market determine this rather than being forced by government. In most cases this so-called renewable energy costs more than energy now produced. Many of these utilities in order to exist sell much of their production out of state when it becomes non-competitive, what then

This will be expensive.

Again ramp up the goal..... RPS should be 25% by 2015 and 50% by 2025.

and Industry Many utilities are already doing this as part of the package they offer. Why shouldn't the market determine this rather than being forced by government. In most cases this so called renewable energy costs more than energy now produced. Many of these utilities in order to exist sell much of their production out of state when it becomes non competitive, what then

What is the cost? Since you are so intent on socialism, are the poor going to pay the same amount?

Montana already has a renewable portfolio standard.

The State should add any hydro as part of the renewable standard. Water flowing down the rivers is as renewable as wind!

No evidence that this is even possible. It's setting legislation up for failure making today's politicians look good at the expense of tomorrow's suckers who will surely be scratching their heads over how to make this work.

I think some balance of renewable resources is good, and conservation is good, but we need to make sure whatever we require will really provide a benefit to the climate in a cost-effective manner. I worry that we can require these things that will result in increased energy costs, but really not do much to affect climate change. I like the idea of energy efficiency improvements being considered as part of this renewable portfolio.

I support this in concept ~ but (again) is it financially possible? If people would just cut down on the amount of electricity they use, we could make a HUGE difference.

This will cause a great increase in the cost of energy

Green energy can not replace carbon energy, you are only increasing cost to consumers by forcing unreliable and expensive green power on citizens. Let the market determine what is the right amount.

Would support if improved net metering.

BS. Market forces will dictate better. Already a 15% requirement on the books. Who are the Energy Cops? Please do not give them guns.

Our electric cooperative already supplies about 90% of our energy from clean renewable hydropower thru BPA. Any mandate for renewables must recognize that this existing hydropower is renewable and counts toward the mandate. If not you will force Montana voters to give up access to a low cost renewable resource and replace it with a much higher cost renewable resource which makes no sense unless you happen to be the developer of one of the high cost renewable resources. Mandates usually only end up costing customers more and benefiting developers. Our cooperative is already exploring the possible development of small hydropower sites in our area without mandates because it is the right thing to do. Local coop boards know what is best for our members so stay of the way and let us do what is best for our members.

Incentives only tend to spur development of unsustainable inefficient technologies.

Excellent idea. We must give utilities the signal that dirty new energy sources are not viable, and that renewable, local, and low emission power is strongly desired. NO MORE COAL POWER PLANTS OF ANY KIND!

Good start immediately

Please consider making cuts even faster. Scientists say we might be past the tipping point.

Renewable resources are a good idea, but come with a cost that the consumers must pay. I like the general effort to increase renewables, but we need to be pragmatic about it. We need to remove the politics and acknowledge that Hydro power is renewable. We're talking about climate change and reducing carbon output. Hydropower is as good as it gets for this, yet we don't acknowledge it as renewable. Additionally, I believe that the target % that are listed are too high and will result in an undue burden on consumers...unless you allow all hydro power into that mix.

Again, see comments to RC II-1 above. Have you truly evaluated cost/benefit?

More hopeful but can't we go way beyond those percentages by 2025?

Again, these timelines need to be reduced.

People will rise up to whatever level is set, be it high or as demonstrated by this misadministration very low.

Too costly. See comments on previous questions.

This will just drive the electric co-ops under, and force more Montanans to purchase higher priced power from large out of state, and possibly out of country, owned power providers.

Generation of energy from renewable sources will assist on the supply side of the efficiency-supply equation. But there is high risk that some sources of supply generation, such as wood-based or grasslands-based ethanol, will impose problems that approximate those from fossil fuels. And a plausible continuance of drought in our region will impose its own limits on supply of raw material from the land.

raise cost of energy as a whole

Be aggressive with timeline

Just make sure it is not coal-fired power plants!

We need higher proportions of energy to come from clean sources, and it needs to happen sooner than the 2020's.

This plan is great as long as there is strict oversight beginning in 2010 to measure the progress of RPS. In addition: 1) There should be a severe penalty set in place for failure to meet this standard. 2) There should be a goal set for 2015, maybe 12-15% 3) This plan should also include an underlying assumption-based on regulatory measures-that while increasing their RPS, utilities must also increase their efficiency levels.

Why such low aims? By 1990 global warming was already evident. We need drastic investment in drastic technological shifts. The internet revolution provided prosperity. So should the AltEn revolution.

If renewable was economically feasible, the private sector would have switched by now. Obviously it isn't and no government boondoggle will change this fact.

Existing standard in place is sufficient

MT already has a standard and that standard is adequate. Renewable energy does not have enough capacity nor is it reliable enough to take the place of fossil fuel to the levels targeted here.

I work in the utility industry (Transmission) and I seriously doubt there will be the available reliable renewable generation on line by these deadlines.

How much will this cost consumers?

Only if cost-effective options are available.

WIND!

Another government mandate.

Again, 2015 and 2025 are too long to wait to fix a need that is now.

work for even higher percentage of renewable energy use.

Too vague. Sounds like it will raise cost of energy.

n efficiency portfolio mandate is unnecessary to not-for-profit, consumer-owned electric cooperatives. Co-ops have for years been strong promoters of energy efficiency measures by customers as well as providing financial incentives for conservation.

Requiring the utility to achieve all conservation would be akin to requiring a gas station to pay their customers to have more efficient vehicles. Without being under mandates, Montana electric cooperatives are already leaders in energy conservation measures.

What consumer cost and who decides what is 100% of achievable energy conservation. A bureaucracy to monitor the utility?

How about by 2012

Could significantly increase costs to consumers and negatively impact business development.

We could do much more and much better than this - No more CO2 emitting coal plants! We have the technology to move to renewable resources let's get with it now and in a big way!

Raise to 50%

We already do this with all the hydroelectric power we generate. We could build a few nuclear power plants in Montana. Which is a proven and efficient technology. This could also help the economy of eastern Montana.

This recommendation will likely lead to increased costs to consumers and should be analyzed to determine total cost to consumers.

Further objectives for increasing percentages of renewable energy needs to be specified post 2025. Additionally, this objective needs to be adapted and extended to Montana's energy production and export industry, given that 40% of the energy produced in the state is exported. Should extend RPS to include nuclear energy and meet more like 40 or 50% of load by 2025,

Again, government intervening into the lives of a sovereign people, living in a sovereign State, within the borders of a sovereign nation. One step closer to being a completely controlled people.



What exactly is the renewable energy you all talk about? Has a windmill lowered anyone's electrical bills? The economy is based on oil. Drill for more oil in this country. Are we nuts?

Is the projected percentage too high?

This is not a function of the State.

All of these are 'feel good' expensive bulls\*\*t legislation. Global warming is NOT a fact (cold records set last winter in the southern hemisphere) so it might be Northern hemisphere warming, but not global. Secondly, latest studies of the sun spots (that control global temperatures more than humans) indicate that within 20 years we will be back in a 'mini-ice age'. Not politically correct, but MUCH more accurate.

Is infrastructure in place for these goals and are they physically feasible?

Utilities will pass this cost on to consumers

only fair

Here we go again. Renewable? Every year? Every decade? Every time there is an election?

Don't make taxpayers pay for this nonsense.  
WE DON'T WANT OR NEED IT!

all this does is make electricity cost more money

If this is cost effective, mandates are not needed.

- Proposal does not allow for needed flexibility; removes local control of power supply decision-making that has been the hallmark of co-ops' historically stable power rates.

- Co-ops already heavily dependent on one of the most reliable forms of renewable energy in existence: Hydropower. Not only is hydropower more efficient than any form of electricity generation but it offsets more carbon emissions than all other renewable energy sources combined.

- Western co-ops, 100 % hydro-power dependent; Central co-ops, about 60 % dependent; Eastern co-ops, about 30 % dependent.

- Co-ops voluntarily making efforts to expand alternative renewable energy purchases:

- Examples: Fall River Electric pursuing small hydro-power development; Flathead Electric planning biomass power generator; A major power supplier to central and eastern Montana co-ops has set a goal of obtaining 10 percent of their energy from alternative renewable energy sources and is well on its path to that goal.

- All co-ops offer some

this committee of 18 appointed members are trying to dictate to the utility providers where the providers can erect the providers generating units. such as you can only use wind powered units so they have to be in a sustainable wind area. how about water propelled generators they can be built where? the latest water generator to date in Mt is at the Tiber Res.

You will drive up costs. Energy efficiency needs to equate with cost efficiency.

Goals and dates seem minimal. Rewards for early target achieved, penalties for late achievers?

Make sure there are no loopholes so that utilities can't weasel out by selling to foreigners, etc. Make sure they have to comply. Double check your language and terms.

This will make electricity much more expensive, drive jobs from the state/country, and hurt the economic welfare of the poor and middle class.

Too much...

I'm very glad that this would require at least they obtain 100% of the achievable cost effective energy conservation....rock on!

Could take longer

Again, I support the legislation but believe it to be too slow in the implementation phase.

more paperwork, more tax and utility money to go down the drain for some agenda we are already fulfilling.

This is

There should be no exception for co-ops.

As a coop member, I am frustrated with the many loopholes coops are given under federal legislation. Coops need more regulation!!!

Another government mandate!!!

Need to check with all utilities to see if those goals are realistic and achievable.

Again, I agree, but would like to see the percentages increased and the timeline earlier. This must happen soon!

Reduce time frame of "Extend RPS".

This recommendation will likely lead to increased costs to consumers and should be analyzed to determine total cost to consumers.

Arbitrary and capricious. I mean, ethanol has been a BIG winner, hasn't it.

Should read: Provide tax incentive to companies considering building nuclear power generation facilities in Montana.

I am opposed to legislation mandating conservation.

More arbitrary and unnecessary mandates.

Be flexible! New technologies, and new circumstances could occur.

As stated this is an absolutely counter to the consumer interests. To require a cooperative utility this would take money from those who implemented all cost affective conservation to buy conservation from those who did not choose cost affective conservation. If hydro is considered renewable this could be with merit. To the degree hydro is not renewable as state law presently stipulates is to say back off hydro use in montana and send the millions of its economic benefits to other states. To ignor affordability of energy for the feel good of a percent renewable is economicly foolish. There are many instances large scale renewable can be integrated with minimal increased cost but this is not allways the case. In some cases the cost can be very significant.

Renewables and wind energy are fine but coal provides 50% of the energy in this country. Ethanol from corn Ethanol only has a about a 10% net energy benefit and is screwing up food prices and the CRP program in this country. The greenies could live in mud huts, heat with old growth timber, and plant new trees at the same time so they could maintain their "carbon" neutrality".

I dthink our electric cooperatives should be able to run their own business. So far they have provided a much needed service to rural people and small towns that are not profitable to big private companies.

I am all for producing renewable energy to export to markets willing to pay a premium for it. But I oppose mandating higher cost energy for everyone else.

Hydo power = renewable green power currently in use and in the future.

More and faster

They should have already done this for economic reasons.

Again, make it a voluntary program.

It is assumed that utility providers-including cooperatives are the experts on what can be done to conserve energy. They can ecourage/incentivize the formation of public/private and commercial and residential partnerships to conserve energy by developing cost effective renewables (photovoltaic/wind) i.e. the neighborhood or homeowners association solar pannel and/or wind turbine or a community/neighborhood/subdivision innovative ground source heat pump to make such significant investments cost effective for multiple beneficiaries. Newer or even some existing business parks/commercial districts could do the same if builit into the preplaning stages of development or redevelopment.

WILL THIS ANOTHER DRAG ON THE CONSUMERS POCKET BOOK???

Again, if everyone is required to meet these standards, the smart ones will figure out the least expensive way to do it and profit from it. Don't fall into the lobbying trap we see at the national level which prevented any movement in the CAFE standards for 20 years.

Respondent does not have sufficient information or knowledge to rank this recommendation.

market should be lead on pricing, not government

Try challenging these entities to move in this direction. What about costs to the consumer, how will it be factored into this mandate?

Many utilities are voluntarily stepping up to making wind, etc. part of their overall energy portfolio. We do not need artificial mandates that, if done poorly, create inefficiencies.

If renewable energy is the cheapest, wouldn't it seem reasonable that the suppliers would choose that for their portfolio? Why would we want to arbitrarily say you must have so much from here and so much from there? Doesn't that actually drive up the cost of the electricity that is mandated?

there is climate change. But mans impact is limited. Maybe as little as less than 3-5% need cost benefit analysis

Lot of luck.

Provide tax incentives and legal shields for renewable energy investors and developers. Don't legislate, let the market bring renewable energy.

At least 50% of each utilities load met with renewable energy by 2025.

EPS goals should be set accordily with regards to the local context, and subsequent to the evaluation of the availability of potential sites, the existence of applicable technologies, and economic feasibility.

25% is too low

This needs to be impemented sooner 2011

There need to be strong legislative incentives to promote dispersed renewable sources of generation.

would want greater than 25% from renewable

Why be concerned about cost effectiveness? What good is money going to do anyone if the planet is not able to support life?

absolutely no % requirements. This could be very expensive. like Ive been trying to tell you coal is cheap and with some effort is clean. that is really our best bet

Heck, I need a windmill now. What happens when the cost of renewable energy goes through the roof or the environmental impact becomes such an issue. Have you every watched them do the rounds on the windfarms in the morning. They send someone out to pick up all the birds that the turbines kill. This is not a image that you foster I bet. What happens when the requirement for ethanol reaches levels that increase the cost of food such that most people cant afford it. Or we change the food industry structure such that we run our cars while a family starves in some poor country.

Plum Creek supports expansion of renewable energy sources in Montana. Mandating a hard renewable energy target for utilities must be balanced against costs, however.

This is a general comment applying to all areas of CCAC's recommendations.

The costs associated with these program pale in comparison to the future costs associated with taking no action. When doing cost-benefit analyses, its worth remembering that CCAC's recommendations will help to ensure our quality of life and ensure economic security for Montana citizens. We also need to acknowledge and measure the dual impact on our environment and our economy. With proper policies, environmental innovation and economic growth can occur simultaneously.

Conflicting information continues to be revealed regarding certain "green" technologies and "green energies". A full accounting of costs, indirect and direct, along with examination of unintended consequences need to be explored before expanding RPS. As an example, in 2005 the U.S. used 15% of its corn crop to replace less than 2% of its gasoline use. The ethanol effort in part, has led to increased food prices globally and experts are beginning to question the true "green" impacts associated with increased ethanol production and consumption

I would love to see the coops have to play.

Mt. should not be mandating renewable energy sources when these sources are unproven and may have negative net energy balances.