



# SIERRA CLUB

## MONTANA CHAPTER

March 15, 2021

Dear City of Missoula and Missoula County leadership:

Thank you for the opportunity to comment on the Draft Implementation Plan for Missoula's clean electricity and climate goals. The Montana Chapter of the Sierra Club has over 19,000 members and supporters statewide. Thousands of those reside in Missoula County. As you are aware, we fully support and are committed to working with the City and County to achieve the commitment to transition equitably to 100% clean electricity by 2030, and 80% by 2025. We remain appreciative of Missoula's commitment to addressing the climate crisis and to providing clean, healthy energy to residents.

While we recognize the challenging position Missoula is in and the need to work on many levels to achieve its 100% goals, it is apparent from the language of the draft plan that NorthWestern Energy is not engaging as a good faith partner with the City and County. The company still has no real climate goals of its own and has not committed to any changes to the grid or its investments that would negate the need for smaller, local projects that require substantial time and energy to pursue. **Instead, the company is working actively and aggressively against climate progress and against Missoula's ability to achieve its 100% renewable electricity goals, at the state legislature and elsewhere.** Unless and until NorthWestern Energy changes course and works in good faith with Missoula to make significant progress in transitioning the grid and providing affordable, accessible renewable electricity, we are concerned that we have little to gain and a lot to lose through signing the draft plan.

NorthWestern Energy is treating Missoula as a cash cow and will benefit financially and in the public relations realm if the draft plan is signed. At the same time they intend to sign this plan and tout it as evidence of their climate commitment, they will continue to pursue polluting new gas plants and their attempts to keep the Colstrip coal power plant operating long beyond what is economically or environmentally reasonable. They will also continue to lobby actively at the state legislature to make renewable energy more expensive and less attractive to developers and investors in Montana and to make it even more difficult for local communities to take action to make progress for their constituents. We need to ensure that signing this plan will lead to an overall reduction (and over time, elimination) of greenhouse gas emissions; as written and in combination with NorthWestern Energy's other plans and actions in Montana, it will not. Until it does, Missoula should not sign the implementation plan but should continue to communicate with NorthWestern Energy the tremendous public demand for affordable renewable energy and authentic climate action.

Overall, the plan needs to address the political battles as well as the technical options and details. NorthWestern Energy continues to wield outsized power and appears to be holding Missoula hostage in its public relations campaign to paint renewables as expensive and unreliable while it continues to pursue long-term polluting fossil fuel energy investments. Any revised or subsequent plan must also clearly identify which of the programs or projects would occur with or without a signed Implementation Plan. NorthWestern Energy was already working on points A, C, and D of the draft implementation plan, for example. Thus, without the parties clearly identifying those and any other proposals that would happen regardless of whether this plan is signed, the plan is misleading in terms of NWE's actual commitment to progress. It may well serve simply to boost NWE's reputation without them working as a good faith partner to accelerate progress. Specify which of the items in the draft plan need a formal plan in order to be implemented.

We support Missoula implementing projects and programs that will advance its climate goals and create substantial new renewables (and reduce demand through energy efficiency and conservation). **We support:**

- Developing utility scale and community scale solar. However, these need to be provided at lower cost to ratepayers, and made fully accessible to all ratepayers, including renters and those with fixed/lower incomes.
- We strongly support developing a streamlined process for energy data access. NWE should be committed to providing such data in a transparent manner regularly, regardless of any formal plan with Missoula.
- Demand response and rate structure should certainly be addressed. Yet, these are basics that should be provided by NWE without necessitating a formal plan. These are simple things that would help us move forward.

**We have specific concerns over projects and programs included in the draft plan:**

- Utility scale solar should not be limited to a Green Tariffs program. NorthWestern Energy should be planning for utility scale solar and wind across Montana to provide distributed economic benefits and more meaningful progress on addressing the climate crisis in our state. Utility scale renewables are not more expensive and ratepayers should not be penalized for having our investor-owned utility develop and/or purchase such power. Moreover, the specifics of the proposed program are extremely concerning. While green tariffs as a potential part of the mix are not necessarily a nonstarter, the devil is in the details. Here, the details are devilish. Data indicates that renewable energy is more affordable (not to mention, cleaner and healthier). Yet the draft plan perpetuates NWE's misinformation about the cost and benefits of renewable electricity, and would penalize customers who want clean, renewable electricity. NWE doesn't require contract commitments or charge application fees and extra costs for the *dirty electricity* it provides. There is no justification for making new renewable electricity more expensive and inaccessible.
- The Green Tariffs program is hard to measure in terms of what progress will be made towards the 80% by 2025 and 100% by 2030 commitment. We need programs and

projects that are sure to make the progress we need. A program that is both voluntary and punitive such as that outlined in the draft plan is not acceptable. The City and County should not sign off on a green tariffs program unless it is more affordable to ratepayers.

- The community scale solar project is much too small. There is no reason it should be so small or singular. To reduce GHG emissions and make significant progress towards Missoula's goals, NorthWestern Energy should commit to substantially more community solar installations in Missoula -- wherever they are feasible and benefit our community. Moreover, NWE should retain all current installations such as those at Missoula County Public Schools. If NWE is truly committed to working in partnership with our community to achieve our climate goals, it should be doing everything possible to maintain existing community solar and regularly increase it, and join Missoula in lobbying for legislation that makes community solar and other distributed renewable energy projects more accessible and affordable.
- Community solar also should not be made to cost more to ratepayers or the City and County. As presented, it appears that it too would cost more despite it being a more affordable source of electricity on the market. A great example of an effort to make energy available to all community members is the solar farm in Austin, Texas. In this example, solar energy was offered at a cost premium to city residents, and lower-income community members were offered energy at a cost savings.
- Similarly to the other proposals that would add charges to the City, County, and/or ratepayers, the electric bus charging program should be designed to recognize the *benefits* of renewable electricity rather than presenting it as a hardship on NWE. It is time for NWE to get on board with the inevitable transition to electrification and renewable energy, and stop misleading the public by treating it as a lesser or more expensive option. This proposal must also include recognition and discussion of the societal cost of carbon pollution.
- Overall, the plan penalizes Missoulians for any and all increase in renewable electricity, and would not provide it in an accessible manner across the community. It is very concerning that the plan perpetuates misinformation about the cost of investing in renewable electricity. Missoula should not sign it until the plan outlines plans to provide renewable electricity at lower cost and without barriers to all Missoula community members, including renters, low or fixed income households, and others who are most impacted by climate change and have largely been marginalized in the planning.

**Before the City and County sign a plan with NorthWestern Energy, these items should be included in the plan:**

- Establishment and articulation by NorthWestern Energy of actual climate goals, with a commitment to eliminating GHG emissions statewide on the grid.
- Acknowledgement of the social cost of carbon pollution, and a test that accurately reflects the societal costs of this pollution.
- A commitment from NWE to drop its plans for new gas infrastructure and plans for new renewables to be developed and/or purchased instead.

- A commitment from NWE to work with its co-owners of the Colstrip coal power plant/s to work towards closure by 2025, with support for clean-up and transition in the Colstrip community.
- A clear commitment by NWE to invest in local and statewide clean, renewable energy that will be provided as affordable and accessible energy to all its ratepayers, with specific substantial projects in Missoula that are not punitive.
- An acknowledgement by NWE that renewable energy is affordable, reliable, and beneficial to Montanans and Montana communities who are pursuing it.

Without anything to address NWE's plans to continue coal and increase gas infrastructure (and thus increase GHG emissions), Missoula as a community and individuals are left to expend tremendous amounts of personal and local government energy and resources to make up for NWE's destructive plans. We simply will not make the progress we need until a plan includes commitments from NWE to end its harmful, polluting fossil fuel investments while developing clear, renewable energy that is provided at lower cost to ratepayers. The plan also needs a commitment from all the parties to work together to support policies at the state legislature and in other forums that *increase* opportunities for local governments to provide renewable energy, and to oppose the policies that limit those options or penalize communities, businesses, and individuals pursuing renewable energy. We need NWE, the City, and the County all working proactively to end fossil fuel expansion and dramatically reduce greenhouse gas emissions.

Until and unless NorthWestern Energy steps up as a good faith partner in acknowledging and confronting the climate crisis and truly supporting Missoula in reaching its renewable electricity commitments, we urge the City and County to reject this plan.

With gratitude for your leadership, hard work, and commitment to protecting a livable climate for all Montanans,

Summer Nelson  
Chapter Director  
Montana Chapter of the Sierra Club