



Energy Efficiency Post-2011 Phase 2

Workgroup 1 Meeting 2

August 3, 2010

9:00am to Noon

BPA Rates Hearing Room, Portland

Overview

-Discussion of Financial Issues (Issues List #1)

- Dave Barringer of BPA's finance department address the question of whether BPA can carry energy efficiency funds over across rate periods. The answer is no, from a "macro" BPA as an agency level. It is important that BPA's capital budget is closely maintained. If the EE program were to under- or overspend its capital budget, other programs in the agency must adjust so the agency stays whole. Additionally, the BPA capital budget is filed on an annual basis at OMB and is reset each year. BPA has limited access to borrowing authority and needs to balance overall agency needs for capital and cannot have significant changes from the annual budget to actual spending.
- There is some flexibility at the individual utility level if BPA were to enter into bilateral contracts for funding in future rate periods.
- The impact on rates of capitalizing is approximately 10%, i.e., a capital budget of \$100, has a \$10 impact on rates in a particular rate period.
- Unspent capital dollars go into BPA's reserves which will be used when setting rates in general for the next rate period and are not able to be directly allocated to the EE program. This also raises potential slice/non-slice issues because the level of reserves impacts only the non-slice rate.
- BPA wants to treat all conservation expenditures in the same fashion, either expense or capital. BPA is proposing to capitalize EE expenditures in the FY 2012-13 rate period.

- "Utility Pool" (Issues List #2)

- After hearing that the ability for a group of utilities to voluntarily pool their EEI \$ is likely to be of more interest to smaller utilities than larger ones, the workgroup agreed to ask the Small/Rural/Residential workgroup to discuss the utility pool funding concept. The SRR workgroup would bring back a proposal to the EEI workgroup for consideration and to ensure it could work within the overall EEI construct.

- "Common Pool" (Issues List #3)

- Much discussion over how to balance the need to allow utilities ample time to spend their EEI \$ before they are made available to other customers, while ensuring those customers have enough time to spend the EEI\$.
- One suggestion was a staggered check-in with trigger points to gauge whether the utility is on track, and if not, make those funds available to others.
- Another suggestions was to use utilities conservation plans to determine how they plan to acquire conservation and then gauge whether they are on track with the plan (regional dialogue contracts require customers over 25 aMW to submit a "conservation plan," which is not described in detail.
- A few participants asked whether BPA needed a "back up" plan like the common pool--how much risk is there that the EEI \$ won't be spent? Can this be considered a "transition period" and acknowledge that customers will be ramping up their programs (so BPA should be more flexible)?

Decision/Action Items

- Ask SRR workgroup to develop a "utility pool" funding concept to bring back for consideration by this workgroup.
- Participants should continue thinking about the "common pool" concept for further discussion at next meeting and how much certainty and structure they want regarding how the EEI \$ are spent .
- Next meeting: August 17, 9am-noon at PNGC board room; phone bridge will be available (numbers to come) -- we will continue working our way through the Issues List.

Meeting Notes¹

Facilitator:

Megan Stratman (NRU)²

BPA Participants:

Kyna Powers

Josh Warner

Matt Tidwell

Rasa Keanini

1. MS: Review of Agenda
2. MS: last time we had a good discussion about how BPA could treat EEI dollars. At this time, thinking is BPA not going to be able to “roll over” EEI dollars.
3. Dave Barringer (BPA): I read the notes from last meeting. The policy reasons is the goal of my presentation. There’s a difference between the macro and micro

¹ Due to privacy concerns, only BPA staff and workgroup co-chairs are listed in these meeting notes.

² Please note comments made by Megan Stratman do not necessarily represent the views of NRU and are for discussion purposes only.

limitations. I'm going to be talking about the macro level (micro level is utility level, i.e. how utilities carry over funds over from one rate period to another). This distinction does not address the utility level, which I won't address.

- a. Two policy implications: 1) rate setting; 2) BPA's nature as a federal entity.
 - b. For rate setting, BPA puts a lot of focus on the IPR. The outcome of the IPR is very important to BPA because this is used to set our rates; the higher the costs, the higher the rates. Clear relationship. BPA asks people to be careful in their budgeting. Expenses and capital both have an effect on rates. We have heard from all of BPA customers, they need a level of certainty of rates. BPA is committed to IPR; want it to work for many purposes. The budgets in the IPR have to be reasonable. As you discussed last time, because this program has lots of players, there is a high level of uncertainty for hitting the budget level for this program. 50% could go over, 50% could be under their budgets (law of averages).
 - c. You may have heard of the "lapse" factor. In the last rate case, BPA lapses conservation investments. BPA is leaning toward not lapsing conservation expenditures in the future. We expect the region to spend the money allocated for conservation. Thus, leaning to not lapsing
4. Could you please explain lapsing?
- a. DB: a mathematical calculation; running about 15% of spending (capital vs. expense)...
 - i. The region is planning on spending a lot on conservation and we believe it will be spent.
 - b. DB: the second policy: BPA as a creature of the federal govt, has a budget, which is presented to Congress, never approved, just reviewed. Submitted annually. It's not a use or lose it situation. The budget is just reset every year. It doesn't matter what was spent the year before; reset annually. On the expense side, this is pretty straightforward. We can spend based on future dollars. The capital budget is different; a limited borrowing authority. By 2016, we expect to be out of borrowing authority. Congressional offices that review BPA believe they have a responsibility to make sure BPA uses its borrowing authority prudently. The amount asked for each year is some what flexible, but this flexibility requires political favors (1992 was the last time that the administrator had to ask for flexibility; had to go before Congress). From an agency perspective, we are mindful of staying within our capital budgets.
 - c. This doesn't mean that BPA can't ask for more the next year; because it's reset every year. We are constrained by what we put in the IPR, but going from one period to the next, we are only constrained by what people want to pay for in rates.
 - d. Last point to mention: Fish and Wildlife: An interesting analogy. At the contract level there's a process in place to change the budgets, so that is how the fish environment stays within the two levels of budgets.
5. KP: She might have been referring to the Accords.

6. DB: at the macro level, BPA does not have the flexibility to carry funds from one rate period to the next.
7. I don't understand distinction between micro and macro levels. If a utility has budget of 100k, and throughout the rate period it only uses 50k, you're saying the utility can carry over the funds?
8. DB: that's a policy decision for this group to make: the utility would have to adjust the amount during the next IPR.
9. JW: if we collect 100 and spend only 80. in RP two, we would have to build into the budget the 20, e.g. could be a total of 120 in RP two.
10. DB: that's correct, but we could encourage other utilities to spend more because the 100 is already in the budget. You have the benefit of large numbers; the law of averages.
11. Not being a rates guy, can you explain how the capital works? My understanding is that the capital doesn't get folded into the rates until it's spent.
12. DB: If you were building a transmission line, that would be true. Conservation isn't like that. When it's spent, we assume it goes into use/producing conservation benefits.
13. We have about 124 million allocated in year 2012 and 130 million in 2013, yet there's going to be a negative effect on the rates.
14. KP: the main impact is that we're getting rid of expense credit and at the same time we are building the capital side, it's a combination: not just that capital has a negative impact because expense is being reduced.
15. DB: depreciation is the periodic write down; today conservation is being written down over 5 years. Maybe will change to 13 years. So $1/13^{\text{th}}$ of total would hit each year. For every 100 dollars spent, you're talking about 10 dollars of impact on rates, cause that $1/13$ on the write down and 3 or 4 percent for interest.
16. Do you start amortizing the first year?
17. DB: there is a half-year convention for amortizing.
18. JW: what happens when 120 is expected, but only 100 is spent.
19. DB: the rates were already higher, so rate payers were charged. BPA ends up with a higher cash reserve and this is used to lower future rates because we have more in the bank. The higher reserves the less revenues needed for risk management.
20. But this capital could be used for other programs?
21. DB: yes. Currently EE is spending more, but there is underspending in other areas.
22. Are you putting the whole 130 million into the rates, or just the amortization and interest?
23. DB: the latter, the amortization and interest,
24. JW: We haven't discussed our transition from 2011 to 2012, but thinking we would true up the amount in the ECA to the amount of the EEI allocation for each customer. If there are two dollars today and the allocation for the customer is four, we would probably just add two to get to the utility's allocation budget.
25. If a utility signed a contract with BPA for a budget amount over four years, would that solve some of this problem?

26. KP: BPA would make good on the commitment, but if the sum of the utilities were underspending in the first year and plan to overspend the second rate period, we would still have to charge more for rates in the second period.
 - a. We would have to plan to get pretty close to budget every year.
27. DB: we can sign a four year commitment, but we don't know how conservation will be treated in the future; for the next rate period don't know about capital or expense in future rater periods. So the last two years, might be treated as an expense as compared to capital.
28. MS: is there additional flexibility if you expense costs rather than capital?
29. DB: we have a lot more flexibility with expenses. We rely heavily on the public process with the folks out east, but they don't have the same feeling toward capital expenditures.
30. MS: would the flexibility apply to rolling over expense dollars.
31. DB: it would be a reset, not a carry over. Would have to negotiate with customers.
32. Have you always capitalized conservation.
33. DB: since 1980, there's always been an expense and capitalization components.
34. We started capitalizing it and then switched to expensing it.
 - a. What's the magnitude, if we underspend around 30 million?
35. DB: we always try to watch what is going on in the utility world. There are lots of utilities that expense. Now, utility managers are telling the administrator that even 3 million dollars is a lot for rate changes.
36. KP: in the last several years, we've had a discussion about either capitalizing or expensing our entire budget.
37. An exception: utilities will have ability to bridge some of their dollars in the 2011 to 2012 transition?
38. KP: not really an exception, the past is a different world than the future.
39. I'm going to exceed my budget, I need to know if the ECA funds will be there to spend after 2012.
40. JW: that's what this conversation is about. There will be dollars there, through the ECA. EEI will either be expensed or capitalized moving forward. No rate credit in the future.
41. Following up, if we have ECA contracts now (five year contract) and I have a budget associated with this contract, if my ECA budget is 2 million dollars and I spend only 1 million in '10 and '11, I'm still entitled to another million going forward. Is this not correct?
42. JW: the contract is telling you that there will be funds available for the budget.
43. I'm concerned about the mechanism to make sure the funds will be available. I'm assuming that if I spend 1 million in this rate period, BPA will still have another 1 million for me to use in the next rate period.
44. JW: that's correct. We will probably true up the ECAs contracts. X number of dollars remaining for the ECAs will be trued up for the EEI allocation. Very likely that the EEI dollars will be larger than what's remaining for the ECAs dollars. Answer is yes.
45. KP: if the question is, do we have accounts for each ECA, the answer is no. We manage the overall commitment.

46. I understand, but I'm assuming the agency has made a commitment so that when I come to present the bill for the other 1 million, the agency will provide the funding. I'm wondering why we can't handle this the same way.
47. KP: there's the potential for doing something like that. If we think everyone is on a ramp up, underspend initially and overspend in the future, we would have to collect more in the future. If we set EEI budgets and say spend it whenever you want, there is a risk of when the spending will occur.
48. You could put an annual limit on it, i.e. how much is reimbursed by BPA, but BPA could still commit to paying for the whole project.
49. KP: the goal of this workgroup is to figure out how to manage the "lumpiness." So we need ideas of how to manage this from the macro level.
50. JW: We could say we have a 100 million budget for rate period one and 100 million and only spent 50 million in the first period, we would have to collect 150 million the second rate period, but this would mean double collecting and we are trying to avoid this, assuming people don't want this to happen.
51. DB: you've effectively hit it on the head.
52. The money goes into the reserves and this could lowering rates.
53. KP: if EE doesn't spend it, it could go into reserves, but this risks some other part of agency using it, so there would be no positive impact on rates.
54. Is it possible to set aside funds for EEI?
55. DB: no real way to reserve for a specific purpose.
56. How does this work for Fish and Wildlife?
57. KP: I don't think there's a special arrangement. Between rate periods, they face the same issues.
58. My recollection is that we were pressuring F/W to spend only cost-effectively, and I thought there was a mechanism that allowed them to work within a "range."
59. KP: there is a range, and at the micro level they can carry over, but this still has an impact on rates.
60. DB: The budget is really key. You're not penalized by providing a realistic budget.
61. The EE budget is quadrupled in the next rate period.
62. DB: yes, it's very large.
63. Going to capitalizing helped alleviate the problem in Phase 1 of expensing conservation in the rate setting process; this minimizes the problem of double collecting. Correct?
64. DB: yes, reduces it, but it doesn't go away.
65. Goes to minimal levels. We aren't talking about carrying over incredible amounts. Chances are we won't be carrying over much and what we do carry over will be on the capital side, so this is minimal with amortization and interest. You're not double collecting: if there are reserve increases, rates will likely go down in the next rate period. We need to make sure utilities spend front-loaded.
66. MS: Having some sort of contract like the ECA to make funds available in the future. Would BPA be willing to enter an ECA? (Discusses hypotheticals.) Are there any issues with entering five year contracts with utilities and having to manage the overall budget.

67. JW: We would probably say there would be funding available, but we would probably minimize the amount we had to hold...
68. JW: If we don't have contingencies, this lessens the flexibility that everyone has. We would have to hold back funds to make sure we have enough to reach our commitments. We want to create flexibility and one mechanism is saying that a certain amount has to be spent by a given time.
69. KP: Right now we have ECAs that add up to more than the EE budget, but the EEI is set up different; budget is allocated amongst all of the utilities. A bit different. WE need to think about what caps, if any, do we have on the annual amounts and if people want to go over those caps, we have to think about how to do that.
70. JW: the benefit of bi-laterals...with the EEI we lose that flexibility, but we gain equity. If you put X amount in, you have the right to get X amount back. From a regional perspective, we lose the flexibility of moving around funds.
71. MS: If the dollars are capitalized, e.g. 100 million budgeted, but only 80 million spent, what happens to the other 20 million?
72. DB: about 2 million would be added to next rate period.
73. KP: this year EE has had the benefit of using funds that other units of the agency did not spend.
74. JW: the magnitude of the EEI budgets is a lot more. We have more dollars in ECA agreements than we have budgets; assumption is that not everyone will spend all the amounts in the ECAs.
 - a. Under the EEI, we have to assume everyone is going to spend what is allocated to each utility under the EEI.
75. So than it becomes: when somebody under spends...?
76. How soon after the rate case, how soon will utilities know that there EEI budgets are?
77. JW: unclear exactly what time.
78. MS: will be based on the TOCA, can use to put together an estimate.
79. JW: we can have reasonably good estimates of what the budgets will look like.
80. KP: the issue of 3rd party costs will also affect how much is available in the EEI.
81. Uou could probably take your CRC and multiple by 3 and that will probably put in the ballpark.

Break

1. MS: I would like the group to work through the issues list. Margaret and I revised the Issues List.
2. KP: I'm wondering if we should discuss take-aways from this morning's discussion. I thought I heard: the discussion lead to less concern of individual utilities with carry over in a capitalized world than we originally thought.
3. It seems to be more of a management issues for the agency than for the utilities. We will have our budgets and what happens behind the screen doesn't really matter than much, i.e. more of an agency issue.
4. KP: was wondering if anybody had an insights after the morning discussion.
5. The notion that there was a way to carry over funds was pretty much abolished. Not going to happen. Secondly, since we're talking about capitalized money, the rate

impact of underspent monies is a lot less than otherwise would be. Thirdly, this begins to make pooling much more sense, so the funds don't get swept into BPA's reserve pool.

6. If it's capitalized, I'm a little less concerned about the impact on rates. Tiny amounts relative to other things that have major impact on rates. Not that concerned. From our perspective, we want to make sure we have continuity of funding.
7. 20 million dollars is worth a 1% rate increase.

Discussion of Issues List

1. MS: 1.1.: looks like BPA is not going to be able to carry funds over across rate periods, so need to look at the alternatives, e.g. utility pool and common pool.
2. Getting used to the pooling concept. I'm wondering about the assignment of utilities to particular pools, is it voluntary?
3. MS: Discussion of "utility pool"
4. What happens if extra funding from utility pools goes to common pool and still gets unspent, can it be rolled over?
5. I think the answer we heard is no.
6. JW: we are starting the rate case for '12-13 in December '10 and we had a EE budget in January '10, so we won't have a real idea and are making a host of assumptions.
7. Four months into a rate period, you'll have to assume that people will spend their EEI dollars?
8. JW: yes.
9. MS: let's do some brainstorming on the utility pools.

Issue 2: utility pool

10. KP: Assuming each utility has their TOCA share, we're trying to solve "what if a utility needs significantly more than that or not going to spend that amount." So utilities feel like they're going to hit their budget, no real needs for a utility to join a pool. It's hard to talk about it without knowing what the world will look like and what we're trying to fix. Maybe we could just talk about how the pools would work.
11. We want to give utilities the opportunity to work in concert with other utilities to acquire conservation. PNGC and IDEA are examples of pools that is not imposed by the agency by entities with similar interests. It's up to the pool to decide how it's going to operate and be managed.
12. The concept seems more like a funding thing than a program thing. Trying to think about why I would join a pool and I would join one where there will be some money left over for me to use. They've paid in and they're paying for my conservation, so why?
13. RK: the benefit is a temporal switch: you would spend more now, but you might be expected to spend less in the future.
14. Maybe it is about programs; if you're an area to do heat pumps by yourself, you don't have much clout, but if you join five other utilities, you'll have some clout.
15. It is a temporal switch. My vision is that it would be voluntary. The fear that unspent funds get swept into BPA's reserve pool might be enough.

16. JW: it seems that there might be high transaction costs forming the pools. There might be some advantages for the pools being more centrally managed. BPA is concerned about making sure the funds are spent. We should think through it thoroughly before deciding that utilities will just form their own pools. Perhaps BPA should provide the forum for forming pools.
17. I have a concern about gaming under a pooling scenario. I would want to find utilities that wouldn't be able to spend their dollars.
18. But it's a voluntary sort of circumstance; if you can convince other utilities, why not?
19. To allow opened ended pooling concept, I'm not convinced this is a fair approach.
20. Not too concerned, if a utility sees its self-interest to voluntary join.
21. MS: another scenario is if a utility loses a major portion of their load. Don't know if there's a mechanism to true this up.
22. Pools would allow us to join a pool for our industrial customers. Another type of pooling based on projected types of conservation depending on rate classes.
23. I see this as an option BPA is offering, but really it's about utilities and if they want to get together they can. Saying it is BPA's responsibility to make this work is not right; utilities responsibilities.
24. KP: we would need to know if utility A decided to give utility B money. Not sure how it would work mechanically, maybe just a letter would suffice. We don't have contract folks in the room.
25. Utilities wouldn't need to seek approval from BPA to form the pools.
26. Maybe we need more flexibility in the ECAs.
27. PNGC has one ECA that funds all our members.
28. MS: are ECAs going to continue?
29. JW: ECAs are used to provide the EEI dollars. Not sure if Exhibits would need to be added/changed depending on EEI dollars being moved around within pools. We could make that mechanism work: we're paying an invoice to the utility that is making the savings. There would need to be some sort of transfer.
30. MS: why would you need to know where the savings are coming from as long as their cost-effective.
31. JW: maybe we wouldn't have to know, but we would probably want to know.
32. MS: if we have ECAs, this would help when pools are created to prevent reinventing the wheel. We asking BPA to make sure this can flow.
33. JW: Agreed.
34. Do you know exactly how IDEA is handled today under the CRC?
35. RK: IDEA works like PNGC, but the contractual mechanism is unclear.
36. I don't see how BPA can be blind to a pool. BPA is going to need to pay attention to each individual utility unless it's apart of a pool.
37. RK: A utility pool is probably not the same from a pooling group, e.g. PNGC. From a PTR perspective, should a utility pool be structured the same as a pooling group.
38. KP: BPA wouldn't be blind about the budgets.
39. ECAs are going to need to be amended.
40. MS: the SRR workgroup utilities were interested in the utility pool concept and maybe the urban utilities are less interested, so maybe the SRR group could look

at this since it seems like the SRR utilities are better positioned to look into this issue.

41. From our perspective, I don't see us moving forward on this as I wouldn't want to go to my commissioners and ask to give away money.
42. I agree that SRR utilities have more difficulty at times meeting targets. Some of the larger utilities may not understand the benefit to smaller utilities.
43. KP: applicable to that group and we need those recommendations soon.
44. MS: will make sure this issue gets discussed during the SRR workgroup. Would ask that workgroup to discuss and see if it could provide some recommendations.
45. You are refereeing strictly to the utility pool, right?
46. MS: yes.
47. I would like to call Seattle and Tacoma to discuss the possibility of a Puget Sound or I-937 pools.
48. JW: a good suggestion, but at the end of the day, it needs to come back to this group so that all the EEI issues are together.
49. Want to reiterate that it needs to be fair.

Issue 3: Common Pool

1. In order to answer these questions, going to need some information. We need to understand how soon/the latest the money can be made available to BPA and to other utilities.
2. JW: it would always be better to know sooner rather than later if dollars are going to be reallocated. What's a reasonable point in time through a two-year rate period to have that? A utility that wants to spend more would like to know six months in, but a utility that may not spend it all, would want to wait 15 months. From your budgeting perspective or spending patterns, what is going to be best?
3. Another complication might be recognition of how we coordinate this with NEEA activities.
4. With these two year rates periods, what's the repercussion if the targets are meant in the first rate period?
5. JW: the repercussion is that BPA would look at why. If there wasn't enough funding, than BPA would propose to put more funding in rates.
6. I think utilities are motivated to spend their TOCA EEI funds. But since we have all these questions: why do we even have this on the table until we learn?
7. JW: We are trying to anticipate based on our historical experiences (e.g. lumpiness). If a utility is not concerned about losing its TOCA funding, then fine, but this is not what we're hearing from utilities. If the funds are going to be spent during a rate period, then no problem, but we're trying to anticipate if all the funds are not spent.
8. Maybe it should be closer to the end of the rate period when we impose this thing.
9. Rather than having a set point when we take all the money away, maybe we could stage it out?
10. It should be based on a "plan."
11. How do we define if a plan is strong enough?
12. Is your plan to aggregate all the utility plans?

13. JW: we could use the utility plans to facilitate the EEI process, but that only applies to about 35 of our customers; not the case for smaller utilities. Perhaps we could have a two-tiered system, but there has to be agreement.
14. MS: we've had more flexibility on a short notice, but as showerheads and lighting goes away, we're going to have less flexibility in ramping up. Can't get more heat pumps at the click of a contract.
15. I don't think people know what they're facing in terms of budgets that will face them. Going to take some time to ramp up. We don't have much time and particularly for smaller utilities, to ramp up is going to be difficult. Maybe we should be more flexible during the initial period and then we could change after we review the set up. Maybe we should avoid putting together something hard and fast; going to be hard to predict.
16. MS: in a year from now, we should have a good idea and lessons learned.
17. RK: check points could work and lead to trigger points, if necessary
18. Do we see the option of funding going to NEEA, etc.
19. JW: this issue is teed up for workgroup five. With a common pool, there may be an incentive to spend EEI dollars on NEEA even though this may not be the best way to use these funds.
20. When we talk budgets at the utility level, is the 75% strictly for measure cost?
(yes)
21. JW: the capital budget we have put into the IPR process is an accumulation of capital costs, 3rd party costs and we go there from. From a 75/25 perspective, BPA wants the megawatts. There is no requirement that every utility provide 25%; this was just used for BPA budgeting.
22. I was curious about 3.3. Why do we want to separate the rules for standard vs. pay for performance?
23. RK: I think this is applicable to the utility pool. When I thought of the question, I thought along the lines of a utility pool.
24. JW: I was thinking it should not matter: there's a funding and implementation mechanism.
25. RK: from an EE central perspective, we need to know about the rules.
26. PNGC has the ability to do both standards and PFP.
27. RK: from a software perspective...
28. I don't see the difference: either way, the utility is going to figure out where the savings are going to come from and the funding will come from BPA. Shouldn't make a difference.
29. MS: in the discussion of the common pool, we heard a range of options. We could go down a staggered check-in approach. We also heard whether it was necessary to put something in stone or definitions actually in place. Maybe we should hear from BPA. This seems to be a threshold question for BPA.
30. JW: it's a difficult question to answer. If we have confidence that customers have enough flexibility to spend the dollars or give the funding to other utilities, I think we can be comfortable. This just isn't what we've heard: lumpiness, might not be able to ramp up in time. We really need to think through this: customers need to be able to really think about whether they'll be able to spend their EEI funds, which will be a lot more than today's dollars, and if they won't be able to, would

- they be comfortable going to their boards and notifying them that their EEI dollars would go to another utility.
31. There needs to be some education process that goes on here, particularly with the smaller utilities. No longer talking about a rate credit. People are going to have to do programs in order to get the money taken from their rates. People are still operating in the CRC world and I'm not sure people really understand exactly how this is going to work. In a sense, all of this is pay for performance! It takes people awhile to realize that "yeah, I can't use this money and it's better to give it up," because there's no point in saying, "I want my money" and not be able to spend it by the end of two years.
 32. MS: good conclusion. Gives us lots to think about. Please submit discussion ideas to workgroupone@bpa.gov.