

BPA Policy 720-1

Sustainability Program

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1. Purpose & Background

This policy establishes the sustainability program which is administered by the Bonneville Power Administration (BPA) Sustainability Office to monitor sustainability performance, implement engagement and outreach activities, and develop and execute projects to reduce BPA’s environmental impacts consistent with federal regulations. This policy establishes the roles, responsibilities, and guidelines for maintaining compliance with the sustainability goals defined in: [Executive Order \(EO\) 14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability](#); [EO 14008, Tackling the Climate Crisis at Home and Abroad](#); [Department of Energy \(DOE\) Order 436.1A, Departmental Sustainability](#); the strategic goals as expressed in the BPA 2024-2028 Strategic Plan; the core values of BPA Policy 110-1 *Mission/Vision/Values Statement*; as well as alignment with good business practices.

The BPA sustainability program ensures that the strategic benefits of sustainability are captured in agency decision making.

2. Policy Owner

The Chief Administrative Officer (CAO) owns this policy. The Sustainability Program Manager is responsible for its implementation and is authorized to develop, revise, and approve associated procedures, standards, and guidance.

3. Applicability

This policy applies to BPA operations that have an impact on the sustainability performance areas outlined in Appendix A.

4. Terms & Definitions

- A. **DOE Sustainability Performance Office (SPO):** a DOE office that acts in accordance with statutory and EO requirements to implement sustainability for DOE departmental elements, including BPA. This is accomplished through data collection, analysis, reporting, outreach, and communications with programs for knowledge sharing.
- B. **Sustainable Processes and Practices:** Processes and practices that reduce the negative environmental impacts and increase resource efficiency within the sustainability performance areas outlined in Appendix A.
- C. **The Climate Registry (TCR):** A greenhouse gas reporting program in the U.S. and Canada. BPA reports its emissions to TCR.
- D. **Vulnerability Assessment and Resilience Plan (VARP):** A report outlining climate risks and resiliency measures specific to BPA assets. A monitoring report is submitted to DOE annually; major updates (e.g., new risks, new assets) are submitted every four years.

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5. Policy

It is BPA’s policy to provide for sustainable and efficient operations pursuant to the requirements contained in the Energy Independence and Security Act of 2007, EO 14057, EO 14008, and other applicable statutes as listed in the Authorities & References section. BPA will factor environmental considerations into all decisions that impact the sustainability performance areas listed in Appendix A and strive to reduce environmental impacts from its operations in a manner consistent with its sustainability goals, strategic goals, and core values. Organizations whose operations impact sustainability performance will participate fully in the execution of this policy and partner with the Sustainability Office to complete the activities listed below.

To support compliance in a manner consistent with good business practices, the sustainability goals defined in EO 14057, EO 14008, the strategic goals as expressed in the BPA 2024-2028 Strategic Plan, and the core values of BPA Policy 110-1 *Mission/Vision/Values Statement*, the following activities will be undertaken at BPA:

- A. Sustainability performance will be monitored and submitted to TCR and the DOE SPO.
- B. Engagement and outreach activities will be undertaken to promote sustainable best practices with internal and external stakeholders.
- C. Special projects will be developed and executed to reduce BPA’s environmental impact in the sustainability performance areas outlined in Appendix A.

6. Policy Exceptions

This policy does not apply to habitat conservation or restoration activities, or the energy efficiency programs offered to BPA customers.

7. Responsibilities

A. The **Sustainability Office** manages the following activities:

1. Sustainability performance tracking

- a) Track the major environmental impacts in accordance with the sustainability performance areas listed in Appendix A.
- b) Track, analyze, and report metrics required to comply with federal mandates or support other sustainability projects.
- c) Submit performance data on an annual basis to federal, state, and national organizations such as TCR and the DOE SPO.
- d) Collaborate with organizations across BPA to improve methods for capturing sustainability data.

2. Engagement and outreach

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- a) Promote sustainable best practices with internal and external stakeholders by:
 - i) Publishing sustainability materials including articles, reports, or other written or visual materials;
 - ii) Organizing sustainability events to promote employee engagement; and
 - iii) Partnering with external stakeholders to advance and highlight BPA’s sustainability efforts with the public.

3. Special projects

- a) Develop initiatives to maintain or improve BPA sustainability performance.
- b) Convene inter-organizational working groups to develop initiatives to maintain or improve BPA sustainability performance.
- c) Quantify the costs and benefits of any proposed initiative and share findings with stakeholders as needed.

B. Sustainability Leadership Committee (SLC):

- 1. Executives who have been identified in the Sustainable Leadership Committee Charter will partner with the BPA Sustainability Office in the following activities:
 - a) Identify and approve Sustainability Workgroup activities (e.g., special projects, report development).
 - b) Ensure Sustainability Office priorities and practices are transparent across BPA and align with larger agency decision-making processes and goals.
 - c) Review annual sustainability performance metrics and annual reports submitted to DOE including, but not limited to, BPA’s Site Sustainability Plan, VARP, Zero-Emissions Vehicle Plan, and Carbon Pollution-Free Electricity Plan.
 - d) Help identify, prioritize, and resource sustainability projects and initiatives identified in approved sustainability strategies and plans.

C. SLC Workgroups:

- 1. BPA employees who have been identified as subject matter experts and serve as either chair or members of a SLC Workgroup will partner with the Sustainability Office in the following activities:
 - a) Address a specific issue or sustainability priority area in regular workgroup meetings or utilizing short-term sub-workgroup meetings.
 - b) Provide analysis of sustainability projects and provide recommendations to the SLC.
 - c) Provide data and analysis for required reports as needed to meet reporting requirements.

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- D. **Business Resilience Program Manager**, within the CAO Program Management Office, leads the developing and monitoring of BPA’s VARP as it pertains to EO 14008 and related DOE SPO guidance. They coordinate with the Sustainability Office on a regular basis to ensure timely development of the VARP and annual monitoring report. They also partner with the Sustainability Office on engagements and outreach on topics related to resilience and sustainability.
- E. **Managers** whose operations impact the sustainability performance areas defined in Appendix A will partner with the Sustainability Office in the following activities:
1. **Sustainability performance tracking**
 - a) Ensure that relevant performance data are tracked and made available to the Sustainability Office.
 - b) Collaborate with the Sustainability Office as needed to improve methods for capturing sustainability data.
 2. **Engagement and outreach**
 - a) Inform the Sustainability Office of sustainability achievements and any opportunities to better integrate sustainability into processes or decision making.
 - b) Follow all sustainable processes and practices developed by the Sustainability Office.
 3. **Special projects**
 - a) Implement sustainability initiatives in partnership with the Sustainability Office.
 - b) Participate in inter-agency working groups to develop sustainability initiatives to maintain or improve BPA sustainability performance.
 - c) Provide information to the Sustainability Office to track the progress, costs, and benefits of sustainability initiatives.
- F. **Communications** will partner with the Sustainability Office in the following activities:
1. Publish written and visual materials to promote sustainability events.
 2. Develop BPA Connection articles, reports, and social media campaigns to publicize sustainability initiatives and achievement.

8. Standards & Procedures

A. Procedures

The following BPA procedures will be used to collect data related to sustainability performance for the following:

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1. BPA Procedure 720-1-1, *Sustainability Performance Data Collection and Reporting*.
This procedure describes the process of collecting data needed for BPA’s reporting to DOE.

Internal procedures for TCR Data Documentation. These procedures are maintained in the shared drive available to the Sustainability Office.

B. Standards

In cases where required data are not readily available, methodologies for collecting these data will be developed in coordination with the organizational managers.

9. Performance & Monitoring

The Sustainability Program is administered through the CAO’s Program Management Office and governed by the SLC. The Sustainability Office ensures compliance with this policy through:

- A. Submission of annual performance metrics to relevant agencies as described in the Standards & Procedures section of this policy.
- B. Monitoring levels of employee engagement and compliance with all mandated sustainability processes and practices.
- C. Implementation of sustainability performance improvement projects.
- D. Quarterly updates to the SLC, and monthly updates to the BPA CAO and Deputy CAO on the execution of BPA’s Sustainability strategy.

10. Authorities & References

- A. Energy Independence and Security Act of 2007
- B. Energy Policy Act of 2005
- C. EO 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*
- D. EO 14008, *Tackling the Climate Crisis at Home and Abroad*
- E. DOE Order 436.1A, *Departmental Sustainability* (2023)
- F. Implementing Instructions for EO 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability* (2021)
- G. TCR Electric Power Sector Protocol
- H. TCR General Reporting Protocol
- I. BPA 2024-2028 Strategic Plan
- J. BPA Policy 110-1 *Mission/Vision/Values Statement*

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11. Review

This policy is scheduled for review by the Policy Owner at least annually to ensure the policy statements are accurate, complete, and current with all applicable regulations that govern sustainability in federal operations.

12. Revision History

Version Number	Issue Date	Brief Description of Change or Review
3.0	8/3/2015	<ul style="list-style-type: none"> • Migration of content to new policy format. • Replacement of IBS with CAO. • Replacement of Sustainability Executive Steering Committee and BOB with CAO MC. • Replacement of reference of cross-agency targets, KPIs & KSIs with annual targets. • Replacement of Fossil Fuel Reduction with GHG emissions reduction. • Replacement of scope of fossil fuel reduction initiative. • Introduced Carbon Management and related terms and definitions which have already been part of the program since 2010. • Allocation of tracking, analysis, reporting and management of the sustainability program to CAO Internal Ops team. • Addition of a strategic planning 5-year cycle and action plan for support organizations. • Eliminated storm water management component from policy as GC guidance.
4.0	4/17/2020	<ul style="list-style-type: none"> • Title changed from “Sustainability Practices and Responsibilities” to “Sustainability Program.”
5.0	5/21/2024	<ul style="list-style-type: none"> • Updated references and policies related to EO 14057 and DOE O 436.1A.

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Appendix A: Sustainability Program Performance Areas and Reporting Metrics

On an annual basis BPA submits a Site Sustainability Plan (SSP), which is an annual summary of BPA’s sustainability measures, plans, and progress reported to DOE SPO. The SLC Workgroups are instrumental in supporting the completion of these reports. The following reports are submitted as part of the SSP:

1. Zero-Emission Vehicle (ZEV) Fleet Strategic Plan
2. Carbon Pollution-Free Electricity (CFE) Plan
3. Bio-based Product Workbook
4. Sustainable Acquisition Contracts Workbook
5. Water Management Plan

The table below describes the data collected and reported to TCR, DOE SPO Dashboard, and/or the annual BPA Sustainability Highlights.

Sustainability Performance Area	Unit	Metric	Data Source
Alternative commuting rates			
The ratio of commuters who utilize options such as mass transit; carpooling; biking; walking; telecommuting; compressed work weeks; and low-emission, fuel-efficient, or alternative-fuel vehicles to those who drive to and from their workplace in a conventional single-occupant vehicle.	Trips	Number of trips taken to and from work using an alternative mode of transportation	Workforce survey
	Trips	Total number of trips taken to and from work	Workforce survey
	Miles	Distance traveled to and from work using an alternative mode of transportation	Workforce survey
	Miles	Total distance traveled to and from work	Workforce survey
Energy consumption			
The electricity and natural gas consumed by BPA facilities and equipment, including both station service and utility purchases.	Kilowatt hours	Total electricity consumed by facilities owned or controlled by BPA	NW, TP
	Therms	Total natural gas consumed by facilities owned or controlled by BPA	NW
Fleet fuel consumption			
The gasoline, diesel, propane, biofuel, and other alternative fuels consumed by BPA’s owned and leased vehicle fleets.	Gallons	Total fossil fuels consumed by vehicles owned or leased by BPA	NS
	Gallons	Total alternative fuels consumed by vehicles owned or leased by BPA	NS
Greenhouse gas emissions			

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<p>The seven gases – carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, and nitrogen trifluoride – recognized by the Kyoto Protocol as contributing to the greenhouse effect, reflecting energy from the atmosphere back toward the earth’s surface. BPA emits greenhouse gases during the course of its daily operations.</p> <ul style="list-style-type: none"> • Scope 1 greenhouse gas emissions: Direct emissions from sources that are owned or controlled by the agency, such as vehicles and equipment, stationary sources, on-site landfills, wastewater treatment facilities, and fugitive emissions. • Scope 2 greenhouse gas emissions: Indirect emissions resulting from the generation of electricity, heat, or steam purchased by the agency. 	Gallons	Total aviation fuel consumed by planes or helicopters owned by BPA	TA
	Gallons	Total diesel and biodiesel consumed by emergency generators at BPA facilities	NW, TT
	Metric tons	Total HFC-134a emitted by refrigerators at BPA facilities	NW
	Metric tons	Total HFC-134a emitted by vehicles owned or leased by BPA	NS
	Metric tons	Total SF6 emitted by equipment owned by BPA	TEVA, E
	Megawatt hours	Transmission line losses from power transmitted by BPA	TP
	Megawatt hours	Total electricity consumed by facilities owned or controlled by BPA	NW, TP
	Therms	Total natural gas consumed by facilities owned or controlled by BPA	NW
	Gallons	Total fossil fuels consumed by vehicles owned or leased by BPA	NS
Gallons	Total alternative fuels consumed by vehicles owned or leased by BPA	NS	
Sustainable purchasing			
<p>The purchase of environmentally preferable goods and services. Sustainable products are often distinguished by a third-party certification such as BioPreferred, ENERGY STAR, EPEAT, WaterSense, or other accreditation.</p>	Pieces	Amount of EPEAT- or ENERGYSTAR-certified electronic equipment acquired	JN
	Pieces	Total amount of electronic equipment acquired	JN
	Pieces	Amount of equipment with power management features activated	JN
	Pieces	Total amount of electronic equipment with power management features	JN
	Pieces	Amount of equipment with duplex printing features activated	JN
	Pieces	Total amount of electronic equipment with duplex printing features	JN
	Pounds	Amount of printer or copier paper purchased with recycled content	NW
	Pounds	Total amount of printer or copier paper purchased	NW
	Pieces	Amount of bio-based products purchased for janitorial or landscaping activities	NW

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	Pieces	Total amount of products purchased for janitorial or landscaping activities	NW
Waste recovery			
The materials from BPA's waste streams that are diverted from the landfill through recycling, composting, sale, donation, or other reuse, including those processed by the Investment Recovery Center.	Short tons	Total amount of waste landfilled from BPA facilities	NW, NS
	Short tons	Total amount of waste recycled from BPA facilities	NW, NS
	Short tons	Total amount of waste composted from BPA facilities	NW, NS
Water consumption			
The potable and non-potable water consumed by BPA facilities.	Gallons	Total potable and non-potable water consumed by facilities owned or controlled by BPA	NW
Pollinator habitat			
Vegetated areas suited to support pollinator species such as bees, butterflies, hummingbirds, and bats.	Acres	Amount of pollinator habitat planted or enhanced	TF, EP, EC
Business travel			
Travel undertaken on commercial airlines for business purposes.	Miles	Total distance of short haul travel	FT
	Miles	Total distance of medium haul travel	FT
	Miles	Total distance of long-haul travel	FT

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