



**CREDA**  
**Colorado River Energy Distributors Association**

September 24, 2019

CREDA is a non-profit organization representing consumer-owned electric systems that purchase federal hydropower from the Colorado River Storage Project (CRSP) facilities. Collectively, CREDA members, all non-profit entities, serve over 4.1 million customers in the States of Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming.

Hydropower is a clean, renewable resource, but there are many challenges associated with keeping federal hydropower affordable and reliable. One of those challenges is the cost of compliance with environmental laws like the Endangered Species Act (ESA). While CREDA supports the intent of the ESA, we also believe it is time to modernize this decades-old Act.

In our region, the CRSP includes Glen Canyon, Flaming Gorge, and the Aspinall Unit dams and associated transmission facilities. All these dams have been reoperated to provide environmental benefits, and the costs of such reoperation are significant. As wholesale customers of the Western Area Power Administration (WAPA), CRSP customers bear the costs of Reclamation and WAPA compliance with the ESA, including both direct and indirect costs of fish and wildlife conservation.

CREDA believes that it is sound federal policy for the costs of ESA compliance to be transparent to those who are bearing such costs.

Since 1983, over \$534 million dollars associated with environmental compliance have been paid by CRSP power customers. Providing customers with visibility of these costs can help build support for conservation and species recovery programs, such as the Glen Canyon Dam Adaptive Management Program and the Upper Colorado River Endangered Fish Recovery Program, both of which are supported by CRSP power revenues.

CREDA believes that modernization of the ESA can only improve transparency, reduce time and costs of compliance, bolster public support and improve species conservation and recovery through collaborative programs that are supported by reasonable statutory requirements.

CREDA appreciates the opportunity to participate in today's Roundtable.

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