Frank J. Bove, Sc. D
Board
Environmental Community Action
(ECO-Action)

10/5/04
71FR 58882
12

The Grant Building
44 Broad St. NW
Suite 711
Atlanta, GA 30303

(404) 584-6499
http://www.eco-act.org/

RECEIVED
2004 NOV -7 PM 4:00
RULES AND DIRECTIVES
BRANCH
USNRC

SONSI Review Complete
Template = ADM-013

E-RIDS= ADM-03
Add = M. Notich (MDN)
D. Guerrero (CXG3)

Environmental Community Action, Inc. is a non-profit organization. ECO-Action's mission is to help communities organize to confront environmental health threats.

ECO-Action

Wingspread Statement on the Precautionary Principle

"When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some of the cause and effect relationships are not fully established scientifically."

ATSDR

Precautionary Principle: central tenets

- HEED EARLY WARNINGS: Take preventive action in the face of uncertainty (but with credible evidence of potential harm)

- Shift burden of proof to the proponents of activity

- ➢ **Explore a wide range of alternatives to possibly harmful actions**

- Increase public participation in decision-making

Framing

- The way problems are “framed”, and the types of questions we ask about them, impacts the interventions and solutions we seek

- Do we see the problem as one of prevention or as one of control or management?

Risk Assessment vs Precautionary Principle

Risk Assessment Perspective	**Precautionary Perspective**
How much risk does an activity pose?	Is the proposed activity needed?
What level of risk is acceptable?	Are there safer alternatives?
Manage risks	Prevent risks
Act when there is high degree of certainty of harm	Take preventive action even when uncertain of harm

Alternatives Assessment

- Definition: A flexible, holistic analysis of alternatives to prevent impacts from potentially harmful activities
  - includes considering the need for the activity.

- Focus on solutions rather than problems; opportunities rather than inevitabilities.
  - focus on what a proponent of an activity could (or should!) be doing rather than the "acceptability" of a particular potentially harmful activity.

- Gets us out of never-ending discussions of "how risky".

Why explore a wide range of Alternatives?

- ***One of the most essential, and powerful steps to promoting change is the understanding that there are alternatives.***

ACEEE's 3rd National Scorecard on Utility and Public Benefits Energy Efficiency Programs: A National Review and Update of State-Level Activity

Dan York, Ph.D. and Marty Kushler, Ph.D.

October 2005

Report Number U054

©American Council for an Energy-Efficient Economy
1001 Connecticut Avenue, NW, Suite 801, Washington, D.C. 20036
202-429-8873 phone, 202-429-2248 fax, http://aceee.org Web site

2003 State Rankings by Selected Indicators

Table B1: 2003 Ranking by Spending per Capita

Rank		Energy efficiency spending per capita
1	Vermont	$28.26
2	Massschusetts	$21.49
3	New Hampshire	$16.45
4	Washington	$15.21
5	Rhode Island	$14.13
6	Oregon	$13.44
7	Wisconsin	$11.33
8	New Jersey	$11.31
9	Montana	$10.65
10	Iowa	$10.17
11	Connecticut	$10.10
12	California	$9.34
13	Hawaii	$8.72
14	Minnesota	$8.65
15	Maine	$8.03
16	New York	$7.46
17	Idaho	$5.16
18	Nevada	$5.00
19	Utah	$4.29
20	Texas	$3.68
21	Florida	$3.62
22	Tennessee	$2.35
23	Colorado	$1.85
24	North Dakota	$1.56
25	Ohio	$1.37
26	South Carolina	$1.10
27	Michigan	$0.99
28	Kentucky	$0.89
29	South Dakota	$0.88
30	New Mexico	$0.50
31	Indiana	$0.48
32	West Virginia	$0.42
33	Arizona	$0.38
34	Pennsylvania	$0.27
35	Illinois	$0.24
36	Mississippi	$0.18
37	Georgia	$0.15
38	Arkansas	$0.14
39	Alaska	$0.13
40	Louisiana	$0.12
41	Alabama	$0.08
42	Oklahoma	$0.07
43	Missouri	$0.06
44	Maryland	$0.01
45	Nebraska	$0.01
46	North Carolina	$0.00
47	Dist. of Columbia	$0.00
48	Kansas	$0.00
49	Delaware	$0.00
50	Virginia	$0.00
51	Wyoming	$0.00
	United States	$4.65

2003 Ranking by Spending as a Percentage of Revenues

Rank		Energy efficiency spending as a percentage of revenues
1	Vermont	2.98%
2	Massachusetts	2.38%
3	Washington	2.04%
4	Rhode Island	1.86%
5	New Hampshire	1.78%
6	Oregon	1.71%
7	Wisconsin	1.39%
8	New Jersey	1.35%
9	Montana	1.25%
10	California	1.20%
11	Iowa	1.19%
12	Minnesota	1.16%
13	Connecticut	1.10%
14	Maine	0.90%
15	New York	0.81%
16	Utah	0.78%
17	Hawaii	0.72%
18	Idaho	0.64%
19	Nevada	0.45%
20	Florida	0.37%
21	Texas	0.34%
22	Colorado	0.27%
23	Tennessee	0.24%
24	North Dakota	0.17%
25	Ohio	0.15%
26	Michigan	0.13%
27	South Dakota	0.12%
28	Kentucky	0.10%
29	South Carolina	0.10%
30	New Mexico	0.07%
31	Indiana	0.06%
32	West Virginia	0.05%
33	Arizona	0.05%
34	Illinois	0.03%
35	Pennsylvania	0.03%
36	Mississippi	0.02%
37	Georgia	0.02%
38	Arkansas	0.02%
39	Alaska	0.01%
40	Louisiana	0.01%
41	Alabama	0.01%
42	Oklahoma	0.01%
43	Missouri	0.01%
44	Maryland	0.00%
45	Nebraska	0.00%
46	North Carolina	0.00%
47	Kansas	0.00%
48	Dist. of Columbia	0.00%
49	Delaware	0.00%
50	Virginia	0.00%
51	Wyoming	0.00%
	United States	0.52%

2003 Savings as a Percentage of Electricity Sales

Rank		Cumulative annual kWh savings as percentage of kWh sales
1	Connecticut	7.81%
2	California	7.46%
3	Washington	7.23%
4	Minnesota	6.69%
5	Rhode Island	6.18%
6	Oregon	6.02%
7	Massachusetts	5.76%
8	Vermont	4.77%
9	Wisconsin	4.40%
10	Montana	3.88%
11	New Jersey	3.79%
12	Idaho	3.49%
13	Utah	3.20%
14	Maryland	3.14%
15	New York	3.02%
16	Iowa	2.81%
17	Florida	2.63%
18	New Hampshire	2.52%
19	Dist. of Columbia	2.37%
20	Texas	1.61%
21	Colorado	1.27%
22	Indiana	0.80%
23	Hawaii	0.75%
24	Maine	0.45%
25	Tennessee	0.40%
26	Ohio	0.26%
27	North Dakota	0.25%
28	Georgia	0.24%
29	Nebraska	0.20%
30	Oklahoma	0.18%
31	Mississippi	0.17%
32	Kentucky	0.17%
33	Arizona	0.16%
34	Nevada	0.16%
35	Virginia	0.16%
36	New Mexico	0.13%
37	South Carolina	0.13%
38	Illinois	0.10%
39	South Dakota	0.09%
40	Alabama	0.09%
41	West Virginia	0.08%
42	Arkansas	0.07%
43	Alaska	0.06%
44	Louisiana	0.03%
45	Pennsylvania	0.01%
46	Missouri	0.01%
47	North Carolina	0.01%
48	Michigan	0.00%
49	Kansas	0.00%
50	Wyoming	0.00%
51	Delaware	NA
	United States	1.93%

Georgia Environmental Facilities Authority
Assessment of Energy Efficiency Potential in Georgia
Final Report **May 5, 2005**

- In recent decades, many energy utilities and public agencies have made strong and sustained efforts to promote energy efficiency through programs and standards. These efforts have brought significant economic benefits to energy customers and have contributed to ongoing initiatives to enhance the environment and improve public health nationwide.

- However, the state of Georgia has not invested in energy efficiency as vigorously as most other states. In fact, Georgia is one of a small number of states in which energy efficiency programs are barely in evidence.

- For this reason, there is now great opportunity to seize energy efficiency as a large untapped source of economic and environmental benefits for the state of Georgia. Building upon the successes and failures of a wide range of other energy efficiency efforts, Georgia is in an excellent position to stimulate greater investment in energy efficiency.

Solar Revolution: The Economic Transformation of the Global Energy Industry

By Travis Bradford

MIT Press 2006

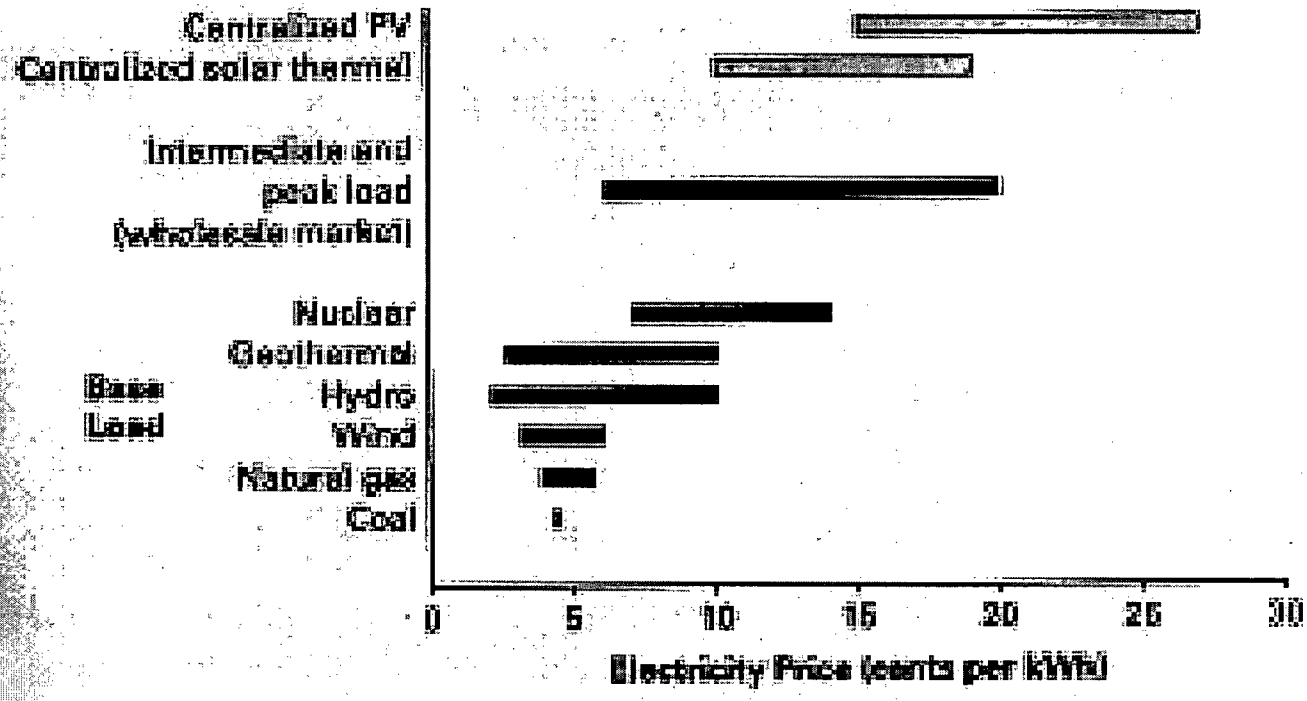

Figure 6.4
Utility electricity generation costs (revisited), including relevant wholesale power prices and solar thermal electricity.

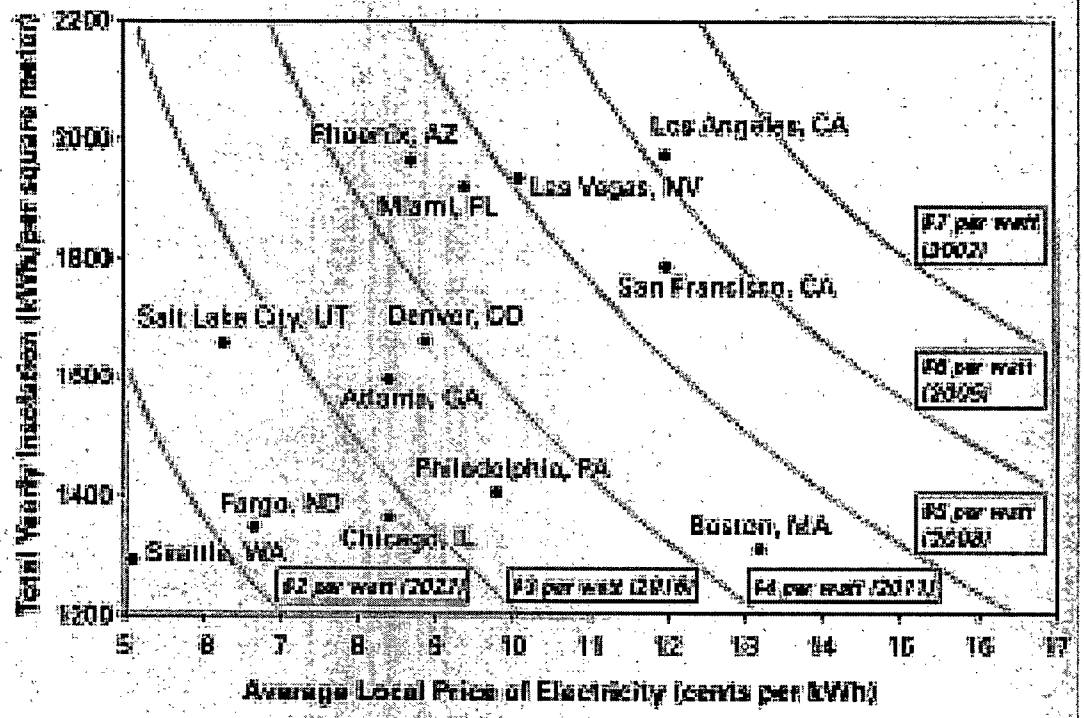

Figure 7.3
PV isocost curves for the United States at various cost levels of PV systems and how PV economics for various cities will change over time.
Source EIA (2005), NASA.