Docket No. 2008-TX100-0001

IN THE MATTER OF CONSIDERING WHETHER TO IMPLEMENT INTEGRATED RESOURCE PLANNING, RATE DESIGN MODIFICATIONS, SMART GRID INVESTMENTS, AND SMART GRID INFORMATION STANDARDS PURSUANT TO 16 U.S.C. § 2621(d)(16), (17), (16), & (17)	§	**BEFORE THE BOARD OF DIRECTORS**
	§	**OF**
	§	**BLUEBONNET ELECTRIC COOPERATIVE, INC.**
	§	**LEE COUNTY, TEXAS**

SUPPLEMENTAL STATEMENT

Bluebonnet Co-op has completed the first stage in determining whether to implement the four EISA Standards and has drafted the Proposed Determination which was approved by the Board last month. As it stands, each standard is slated for adoption, either as is or a modified version that best suites the Co-op and its membership. The Proposed Determination does not, however, address the details necessary to carry out each of the standards. Surely, all of the details needed to implement these four standards cannot be known at this time, some will require more time and effort from Co-op Staff, Board, and membership, and others will likely evolve over the months and years ahead.

The current PURPA/EISA process affords the membership with the opportunity to make comments and suggestions, ask questions, etc. of the Co-op about the EISA Standards. I wish to thank the Co-op for this opportunity and request a response for the following comments.

Regarding the first EISA Standard, Co-op Staff, for their energy efficiency planning, may or may not be considering a committee with member participation. PURPA was initially enacted in 1978 for the purpose of conserving resources. The definition of Integrated Resource Plan (IRP) footnoted in Staff's Proposed Determination stems from this 1978 legislation. However, in 1992, lawmakers saw fit to add Standard #7 possibly to add some functional attributes to the IRP process theretofore overlooked by IRP participants. Standard #7 reads as follows:

> "Each electric utility shall employ integrated resource planning. All plans or filings before a State regulatory authority to meet the requirements of this paragraph must be updated on a regular basis, must provide the opportunity for public participation and comment, and contain a requirement that the plan be implemented."

These requirements add a level of integrity to the IRP process. Certainly, requiring that the plan be implemented and updated on a regular basis are both reasonable as doing otherwise would be just a meaningless exercise.

I believe that the Co-op should also consider providing the opportunity for public participation and comment Within Bluebonnet's membership, there is a vast diversity of talented and experienced individuals. I believe that the Co-op's overall energy conservation and efficiency programs can benefit from the input from such individuals. I urge Staff to please consider some level of public participation from its membership for their energy efficiency planning.

Regarding the forth EISA Standard, just providing information about the greenhouse gas emissions for each type of generation does not provide the consumer with the complete picture. Information regarding the NO_X and particulate matter released into the atmosphere as well as the build up of ash sludge would contribute to a more honest representation of the facts. But the picture is still not complete. Electrical energy consumers may not realize that approximately two-thirds of the energy in a coal fired plant is expelled into the environment as waste heat. Electrical energy may best be suited to power household electronics and for air conditioning and refrigeration, whereas, using electrical resistance heating for water, cooking, and heating our homes is a waste of such a valuable commodity. Given the knowledge of the inefficiencies in producing electricity, consumers may want to opt for natural gas or propane for basic heating applications.

The remaining one-third of the energy at the coal-fired plant that is converted to electrical energy, is delivered to the average household where all of it is ultimately converted to heat. Powering electronics, lights, and running the air conditioner all result in a net heat production. With very few exceptions, all fossil fuels burned to produce electricity, since the very first burn, has resulted in heat.

In the Texas Electric Co-operative's Magazine, Mark Rose always contributes an interesting and informative article. Possibly some of these subjects could be presented such that members can make informed choices and decisions in their energy choices and consumption.

I wish to thank the Board and Coop Staff for allowing me this opportunity to present my views.

Sincerely,

John Borsheim

Bluebonnet Coop Member, Bastrop County

CERTIFICATE OF SERVICE

I, John Borsheim, certify that one copy of this document was served in this proceeding on 7 July 2009 by Email Transmission.

By: Signature Not Verified John Borsheim Digitally signed by John Borsheim DN: cn=John Borsheim, c=US Date: 2009.07.07 14:51:23 -06'00'

John Borsheim