



# UNION COUNTY

## Planning Department

Scott Hartell, Planning Director

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March 21, 2016

Oregon Public Utilities Commission  
PO Box 1088  
Salem, OR 97308-1088

RE: Docket No. LC63, March 24, 2016

Dear Commissioners:

The Union County Board of Commissioners, meeting in regular session, March 16, 2016 received a report from the Union County Boardman to Hemingway Advisory Committee regarding the “need” for the B2H project. This report included 13 identified concerns about the Idaho Power Company’s 2015 Integrated Recourse Plan (IRP) and the Union County Board of Commissioners agreed by consensus to forward these concerns for your review through public comment on March 24, 2016 and your review of Docket No. LC 63.

The 13 points of concern are as follows:

1. IPC did not demonstrate a willingness to utilize its own resources to meet demand needs.
2. IPC did not discuss how the Gateway West transmission line from Wyoming affects unmet needs.
3. IPC’s projections of population growth and hence electric demand growth were not supported.
4. IPC’s unmet load projections as discussed in the draft Environmental Impact Statement (DEIS) are questionable.
5. There is no analysis of measures IPC intends to take to provide reliable service.
6. IPC did not model their existing transmission rights, or upgraded lines, despite gaining megawatt (MW) availability when the Boardman plant and two units of the North Valmy plant either go offline or reduce power generation.

7. IPC did not select the least-cost portfolio, given comparable levels of risk among the alternatives considered.
8. IPC did not evaluate the cost of the B2H line to Oregon customers relative to the benefits received.
9. IPC did not make the best use of energy conservation initiatives as alternatives to the B2H line for residential, industrial, and agricultural customers, and focused these initiatives only on high demand customers.
10. IPC's analysis of building blocks of distributed energy is lacking in that it did not evaluate these technologies on par with other supply-side resources, and did not quantify additional benefits of distributed generation.
11. IPC did not identify why existing wind and solar contracts cannot be used and did not explain why planned wind and solar projects were not considered.
12. IPC did not demonstrate an analysis that the distribution of costs is consistent with demand for the B2H line.
13. There is no analysis that IPC considered the impact of Federal Energy Regulatory Commission (FERC) Order 1000 requiring consistent voltage regulation of inputs into transmission lines.

Please take these concerns with the Idaho Power Company's 2015 IRP into consideration, and submit this letter into the public record for Docket No. LC 63.

Sincerely,



Scott Hartell  
Planning Director

Cc: Baker County  
Malheur County  
Morrow County  
Umatilla County  
Oregon Governor's office of Energy