

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

IN THE MATTER OF IDAHO POWER COMPANY'S 2023 Wildfire Protection Plan	Docket: UM 2209 STOP B2H COALITION
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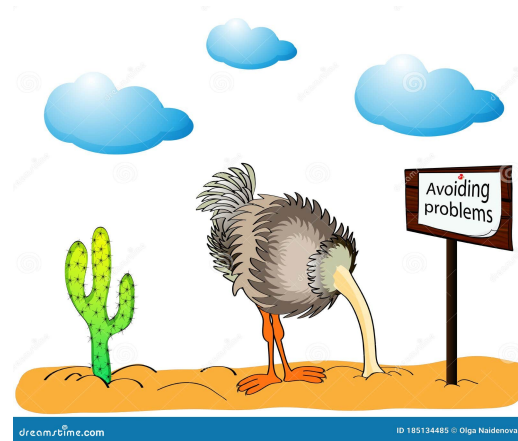
Date: May, 30 2023

Jim Kreider, Intervenor

/s/ Jim Kreider

On behalf of the Stop B2H Coalition

The STOP B2H Coalition (STOP) appreciates the opportunity to again comment on Idaho Power Company's (IPC) incomplete Wildfire Mitigation Plan (WMP). STOP is stating again that the plan is incomplete because there have been no changes since the 2022 plan regarding the Boardman to Hemingway (B2H) transmission line. In IPC's 2022 WMP STOP pointed out the State of Oregon, Union County, and the local electrical coop—OTEC, all find high-risk wildfire zones on the B2H route in Union County. Idaho Power has not. If 3 other entities, the state, a county, and an electrical co-op, that are in the business of detecting and mitigating for Wildfire identify high risk areas and IPC does not, their methodology must be flawed. To not acknowledge these differences after them being pointed out in detail in 2022 and again below demonstrates the company's ostrich head in the sand mentality around wildfires.



Not Protecting the Public from Wildfire Danger

Idaho Power is to have a Wildfire Mitigation Plan for the B2H per OAR 860-300-0020(1)(a)(A) & (B) which includes areas that are subject to a heightened risk of wildfire: (A) Within the service territory of the Public Utility, and (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.

Idaho Power does not comply with this OAR. Three other agencies mentioned above, responsible for Wildfire management, have identified that Union County Morgan Lake area of the EFSC approved B2H Morgan Lake segment, as a Wildland Urban Interface (WUI) which is

the highest risk wildfire area in Union County. Why are these areas not in the company's 2023 Wildfire Mitigation Plan?

Wildfire

The reality is **there is no Wildfire Mitigation Plan for the B2H** and that is a clear violation of OPUC rules for Wildfire Mitigation Plans.

The petitioner is to have a Wildfire Mitigation Plan for the B2H per **OAR 860-300-0020(1)(a)(A) & (B)** that includes areas that are subject to a heightened risk of wildfire: (A) Within the service territory of the Public Utility, and (B) Outside the service territory of the Public Utility but within the Public Utility's right-of-way for generation and transmission assets.

In Idaho Power's 2022 and 2023 Wildfire Plans submitted to the OPUC in section 3.2.2.1. Boardman to Hemingway Proposed Transmission Line the company says,

“Idaho Power specifically considered the proposed route of the B2H 500 kV transmission line as part of the WMP. The proposed B2H route was included in the wildfire risk assessment and associated map analysis (see Figure 3).⁴ Two locations are identified along the route as having increased wildfire risk (YRZs), and there were no areas of higher risk (RRZs). Although the B2H transmission line has not been constructed as of the publication of this 2023 WMP, Idaho Power intends this WMP (as it will be reviewed annually) will apply to B2H. Additionally, Idaho Power will continue to update its fire risk mapping periodically and address the locations with elevated risk consistent with the mitigation strategy for transmission lines as described in sections 5–9 of this WMP.”⁵ [emphasis and strike -out added.]

In comparing the first and second set of bolded sentences (above), the wording moves from *specifically considering the proposed route of the B2H* –to-- Idaho Power *intends this WMP (as it will be reviewed annually) will apply to B2H*. The word “intends” speaks to a plan for some

future action. In order to receive a CPCN these actions need to be complete to ensure the safety of the public.

To further demonstrate that there is not Wildfire Plan for B2H in the 3/13/23 UM 2209 Idaho Power Wildfire Workshop, IPC presented some conflicting information. In the workshop at 2:19:02 Wendy King (an interniner in PCN 5) asked Jon Axtman, T&D ENGINEERING & RELIABILITY SR. MANAGER for IPC the following question:

“Yes. I have a question about this whole plan that you're proposing. Is this mainly focusing on your current customers? Or is it also focusing on the people impacted under the transmission line B2H.”

Mr, Axtman responded: *“Right now, it's only focused on on our current customers I mean that B2H hasn't been constructed yet. But it is it is primarily focused on our customers that we have now.”*

A little later at 2:21:08 Alison Williams, IPC’s regulatory policy and strategy leader clarified by saying, *“But just to kind of follow on on Jon's response. B2H, even though it is not a constructed line was included in is included in Idaho power's risk assessment. And so to that extent it is covered, but it we can't provide risk mitigation for facilities that don't exist yet.”*

These comments reinforce that a plan is developed for IPC’s service area but not for the B2H -- because it is not built yet.

But we are told in the 2023 Wildfire Plan in section 3.2.2.1. Boardman to Hemingway Proposed Transmission Line that, **“Idaho Power specifically considered the proposed route of the B2H**

500 kV transmission line as part of the WMP. The proposed B2H route was included in the wildfire risk assessment and associated map analysis (see Figure 3).”

As one can see from the figure below the only risk areas identified are in Idaho Power’s service territory—not along the transmission route. IPC has missed a number of high-risk areas along the B2H, namely in Union and Morrow Counties.

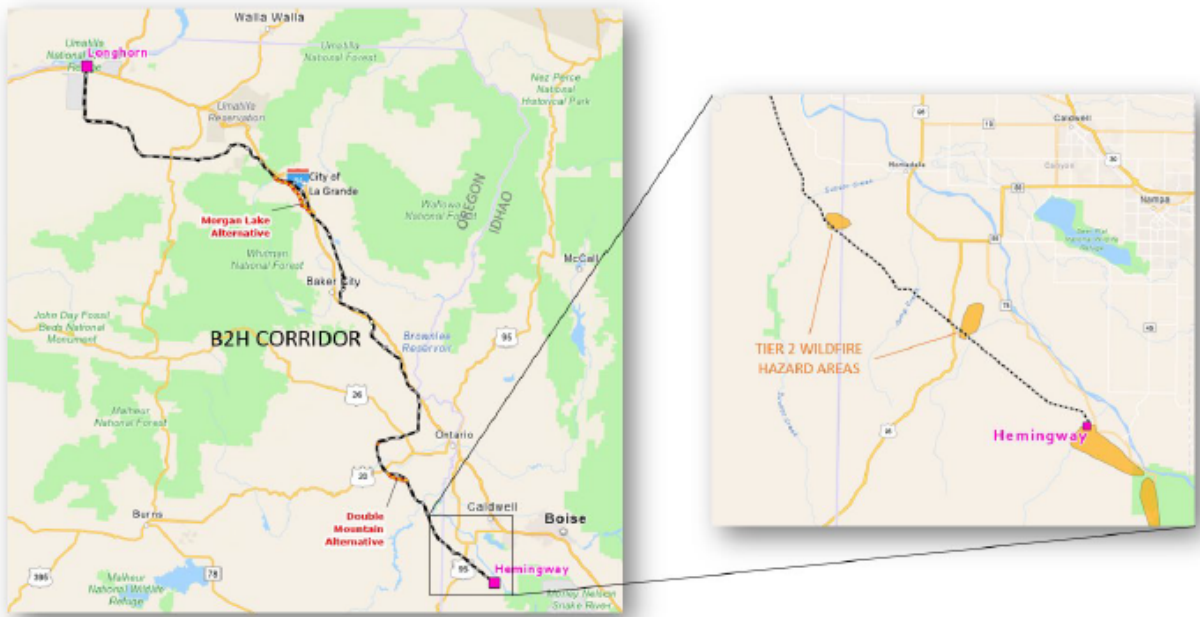
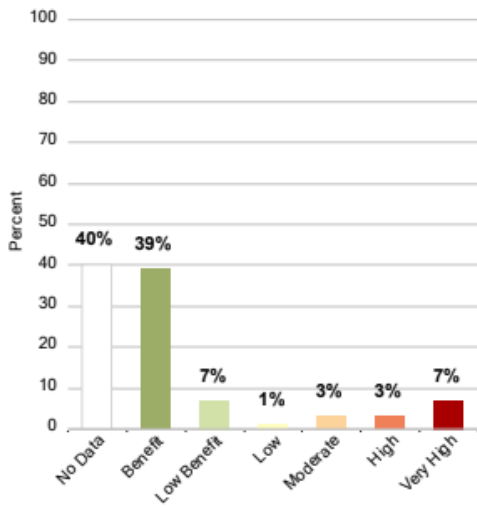


Figure 12
B2H proposed route risk zones

The State of Oregon, Union County, and the Oregon Trail Electric Cooperative (OTEC) all identify areas of high wildfire fire risk along the B2H route in Union County. Somehow IPC missed this in their *thorough* Wildfire risk analysis. This information was shared with the company during the 2022 Wildfire mitigation docket UM 2209 and still holds true today.

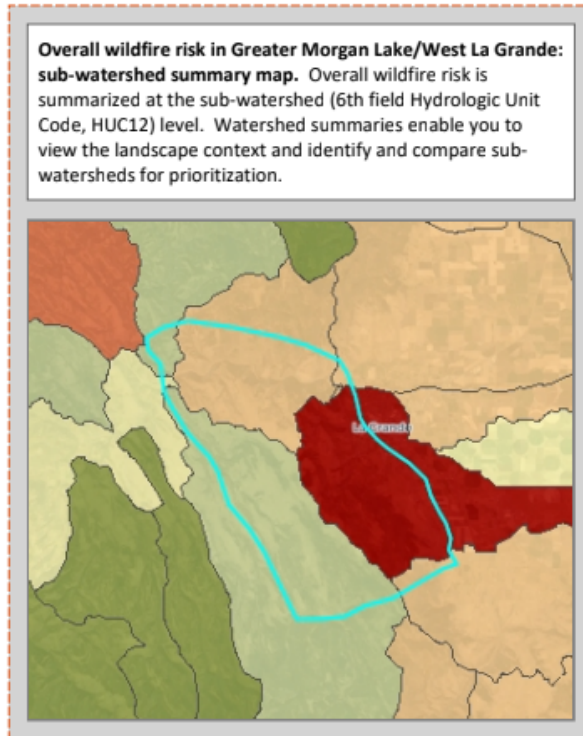
The three images below are from the state, county, and OTEC showing fire risk in the Morgan Lake area.

Overall wildfire risk in Greater Morgan Lake/West La Grande *

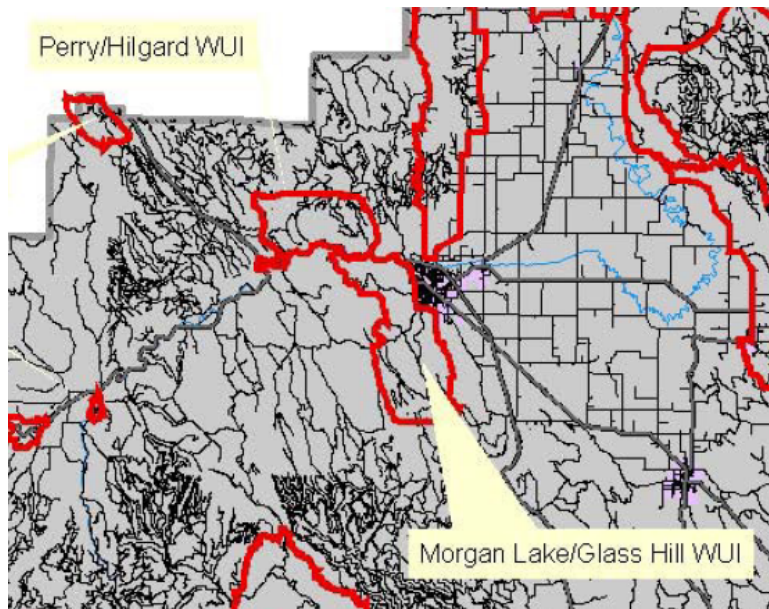


Source: 2018 Pacific Northwest Quantitative Wildfire Risk Assessment, US Forest Service

* Values may add up to over 100% due to rounding precision



Oregon Wildfire Risk Explorer- Advanced Report p 10¹



Union County Fire Protection Plan p 39²

¹ <https://drive.google.com/file/d/1N1JTNUMtnsUXlcelmI9lq-8DcEUS28qZ/view>

² https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/3259/Union_County_Fire_Plan.pdf?sequence=1&isAllowed=y

After the closing of the 2022 Wildfire Planning, OTEC as a Consumer-Owned Utility, submitted their Wildfire Plan and has the Morgan Lake area in a Wildfire PSPS shutoff zone because of Wildfire Risk. The area in grey represents the PSPS shut off zone. Which is where the B2H transmission line is proposed.



OTEC PSPS area Morgan Lake WUI³

In 2+ years of 1:1 meetings, the company will not share its detailed models as requested in writing on numerous occasions which are documented in the records of AR 638 and UM 2209.

This shows a true disconnect of Idaho Power's situational awareness of the area they are building

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<https://otec.maps.arcgis.com/apps/webappviewer/index.html?id=7380f71c438d479c8236df4eed019208&marker=-118.13588%2C45.30094000000003%2C%2C%2C&markertemplate=%7B%22title%22%3A%22%22%2C%22longitude%22%3A-118.13588%2C%22latitude%22%3A45.30094000000003%2C%22isIncludeShareUrl%22%3Atrue%7D&level=8>

the B2H through. The BLM approved route (aka NEPA route) farther to the west is in a lower fire risk area and farther away from the closest population center of La Grande.

STOP shares the written comments it submitted for the 2022 Wildfire Plan as they are still very pertinent to this docket. These are links to STOP's [February 25, 2022](#) and [April 18, 2022](#) comments.

In conclusion IPC must develop Wildfire Plans for its transmission lines even if they are outside of their service territory. STOP has demonstrated that IPC's current Wildfire Plan does not detect a heightened risk Wildfire Zones with the route of the proposed B2H. The commission should not approve this 2023 Wildfire Mitigation Plan.

/s/ Jim Kreider

Jim Kreider

For STOP B2H Coalition