

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

In the Matter of

Idaho Power Company

2017 Integrated Resource Plan

Docket LC 68

**Supplemental Comments from the
STOP B2H Coalition**

**Due to incorrect assumptions on early decommissioning of
Jim Bridger Units 1 and 2
and
North Valmy Units 1 and 2**

Introduction

Since the initial filing of Idaho Power's 2017 IRP and after intervenor opening and closing comments two very significant changes have occurred in this docket. STOP B2H feels it is imperative to bring these changes to the commission and staff attention in this supplemental comment.

The two changes are:

1. PacifiCorp, the majority owner of Jim Bridger units 1-4 and Idaho Power's partner, has chosen not to retire Unit 1 in 2032 and Unit 2 in 2028 (without investing in SCRs) as stated in Idaho Power's 2017 IRP. (Notice given December 21, 2017 by PacifiCorp to the Wyoming Department of Environmental Quality, Air Quality Division.)
2. NV Energy, the majority owner of North Valmy units 1 and 2 and Idaho Power's partner, has chosen not to retire these units as stated in the Idaho Power 2017 IRP. (Notice given to the Public Utilities Commission of Nevada on February 16, 2018 by NV Energy, a subsidiary of Sierra Pacific Company, in their [Life Span Analysis Process for North Valmy Generating Station, Unit 1 & Unit 2, 2018 Update](#).)

These significant changes, in STOP's opinion, *make the 2017 IRP qualitative risk factors analysis invalid*. Some base assumptions in the 2017 IRP were:

- the early retirement of these units and the associated depreciation schedules with costs passed-on to the rate payer was baked into all portfolios; and,
- the loss of generation capacity over the specified timeframe(s), created, in Idaho Power's perception, a "need" in 2026 that had to be compensated for.

With these units not closing in the assumed timeframes the cost and need are no longer correct. Thus, this 2017 IRP no longer represents the operational and financial conditions under which Idaho Power submitted it.

In addition to all the prior inaccuracies that STOP has brought forward for consideration in this case (LC68), these two fundamental assumptions are now also moot, making any reasonable condition for prudent decision making, impossible.

The key elements that impact decisions about early coal retirement(s) and their influence on the basic assumptions about B2H should be deferred to the 2019 IRP and the company given the opportunity to correct them in the 2019 IRP.