

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
LC 68**

In the Matter of
IDAHO POWER COMPANY
2017 Integrated Resource Plan

Gail Carbiener's Comments

This is my second submitted comments. I appreciate your consideration to receive these comments from a concerned citizen. I am indeed outside of Idaho Power's service area, however am affected by the B2H transmission line's potential damaging effect upon the National Historic Oregon Trail. I am a member of the Oregon-California Trails Association, a national organization whose mission is to protect and preserve the historic trails.

- 1. The U.S. Bureau of Land Management (BLM) released its Record of Decision (ROD) for the Boardman to Hemingway Transmission Line Project (B2H) on Nov. 17, 2017. The ROD allows BLM to grant right-of-way to Idaho Power for the construction, operation, and maintenance of the B2H Project on BLM-administered land. The approved route is the Agency Preferred Alternative identified in the *Final Environmental Impact Statement (EIS) and Proposed Land-use Plan Amendments*. The project must also be considered through the state permitting process. The Oregon Department of Energy and the Energy Facility Siting Council will review Idaho Power's application for compliance with state energy facility siting standards.**

The ROD authorizes Idaho Power to construct, operate, and maintain ONLY on BLM lands and AFTER additional agreed upon requirements are met. I expect the Forest Service to follow with their ROD shortly.

The Applicant has committed to implementing design features and mitigation measures during construction, operation, and maintenance of the B2H Project. The design features and measures will be reviewed, revised, and developed further, as appropriate,

to reduce impacts on resources and their values, services, and functions and, along with explicit implementation plans, will be included in the Plan of Development (POD) for this B2H Project. The POD will be reviewed and approved by the BLM. If the B2H Project is authorized, the POD will be used by the agencies in crafting the right-of-way and other B2H Project-related authorizations as appropriate. Final design and engineering will be incorporated into the POD which will be reviewed and approved by BLM and appropriate agencies prior to any notices to proceed for any surface-disturbing activities associated with the B2H Project.¹

- a. *The Commission should not acknowledge Action Item #6: Conduct preliminary construction activities, acquire long-lead materials, and construct the B2H project.* IPC is asking you to authorize activities in direct conflict with agreed upon BLM requirements.

- 2. The most important part of the BLM Record of Decision, is that it starts the clock ticking for the three partners to come to several agreements. We may not know for some time, but the first action is for partners to pay their costs for permitting to Idaho Power. By the end of January, we should know if all three partners continue with the project. Those who continue have two negotiation periods of 180 days or two years to finalize Development and Construction Agreements. If you read the Funding Agreement either PacifiCorp or BPA can withdraw at any time for any reason.²**

The risk in reaching agreement within two years is likely. This is especially true for Bonneville Power. As part of the Funding Agreement, BPA indicates they are considering “various transmission and other alternatives” to meet their service obligations in eastern Idaho. BPA has indicated they have NEPA and other applicable government requirements that must be fulfilled before a decision can be made.³

- a. As B2H appears in all portfolios suggested to be least cost/least risk, it seems that qualitative risk is large if one of the partners withdraws, or the percentage

¹ Mitigation, Appx-C., FEIS

² Joint Permit Funding Agreement Article VII 7.1

³ Joint Permit Funding Agreement 3.3 Future Agreement (a)(iii)(C)

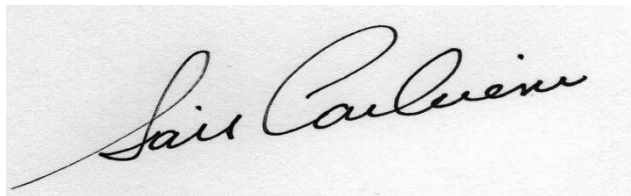
participation is changed significantly. IPC assumes no change! Certainly, the Commission will want to see what IPC can do if BPA withdraws. The Commission should not acknowledge B2H at this time. The Commission should require, in this 2017 IRP, to submit additional portfolios considering these risks.

3. 66% of the B2H Route through Oregon is on private property. Approval of 2/3 of the route is determined by Oregon Department of Energy's Energy Facilities Siting Council (EFSC). The Council has yet to determine that the Application for Site Certificate presented by IPC is "complete."

- a. For the Commission to acknowledge Action Item #6 will perhaps allow IPC to work on an assumed approved route. This not only will be in conflict with its agreement with BLM, but will put the Commission in conflict with EFSC. I again request that the Commission NOT acknowledge Action Item #6.

Submitted electronically

Respectfully,

A handwritten signature in black ink on a light-colored background. The signature is cursive and reads "Gail Carbiener".

Gail Carbiener
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