

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

In the Matter of
IDAHO POWER COMPANY
2017 Integrated Resource Plan
Final Comments

Gail Carbiener Comments

March 12, 2018

I appreciate the opportunity to comment once more concerning LC-68 and specifically Idaho Power’s Final Comments. As you know, I am an intervenor but without confidential access.

I was a party to the telephone “workshop” held on Friday, March 9th. I admit not understanding most of the numeric and statistical details, but it was very obvious that both Idaho Power and StopB2H did not agree. In the February 1, 2018 workshop, Commissioners asked Staff to determine who is correct, or perhaps most accurate. Since Staff did not indicate any preference, or agree with either party, we are left to wait for staff recommendation. I assume, or hope, that the points of difference will be specifically resolved, and include a reason for each.

In my opinion, a project the magnitude of B2H deserves a clear understanding by all parties. Since the general public and Oregon ratepayers certainly are not part of this discussion. They obviously rely on the protection of the Commission, even if they are not aware of this process.

Since 2006 when Idaho Power first proposed a 285 MW power line, now 12 years later, the number of changes have been significant. All the while Idaho Power has not looked at alternatives to provide service to Oregon ratepayers. Common sense suggests that the risk in continuing down the path of large transmission line is risky at best.

Specifically: Idaho Power Final Comments:

- Page 1: lines 21/22: Idaho Power states that for the last four IRPs, the Commission has recognized that continued development of the project is reasonable. This 2017 IRP may be the first where an expert has challenged the underlining assumptions used by Idaho Power. Clearly this challenge brings into question the least risk/least cost of the preferred portfolio.
- Page 3: starting at line 9: With EFSC having permit control over two thirds of the power line property, it makes sense that they wait for a Draft Proposed Order. Even so, it begs the question; are one or more participants not sure of continuing with the project. Even more important, it shows that the Permitting Agreement can be changed at will.
- Page 4: footnote #10: Idaho Power makes a case that BPA and PacifiCorp have made Non-mandatory vesting payments. We do not know the amount paid by each company. These “Non-mandatory” payments are required or the participant will not continue with the project! At this point in time, several million is not a big deal to PacifiCorp or BPA. No company makes payments without some obligation!
- Page 5: start at line 3: My concern is not the cost of B2H at this point, but the ability of Idaho Power to have the financial capacity within Bonding covenants for significantly increased participation percentage of the eventual total cost. At what point will the cost of participation, 35%, 50%, be beyond Idaho Power’s ability legally to finance the project?
- Page 7: Item D: Benefits to Oregon ratepayers: Idaho Power gives no hard data that B2H as the alleged least cost/least risk portfolio, will not raise rates over other portfolios. It is a stretch to assume B2H reduces carbon reduction as an Oregon ratepayer benefit. The third suggested key advantage, changing the generation landscape, by developing future cost-effective resources, moderating seasonal costs and encouraging regional resource diversity, provides no hard data. These statements are for the commissioners, not the Oregon ratepayers.

- Page 21: start at line 15: It remains to be seen if the Design Features are acceptable to stakeholders beyond Federal and State agencies. Idaho Power has placed the Oregon Public Utilities Commission and staff into the position of discussing if not determining environmental issues normally the responsibility of EFSC.
- Page 22: starting at line 17: I continue to request a definition of geotechnical testing to determine if it includes soil disturbance. It appears that OAR 345-025-0006 is in the process of revision. Since Idaho Power has deferred doing any work until the EFSC issues a Draft Project Order, I recommend that the Commission not acknowledge Action Item #6.

It seems to me that with such modification to the IRP, staff work sessions, IPC and StopB2H conference calls, that it is premature for staff to make a firm recommendation at this time. With discovery and disclosure that had not been public, I recommend that another public commission workshop be conducted.

Respectfully

Gail Carbiener