



JENNIFER MILLER
Direct (503) 595-3927
jennifer@mrg-law.com

August 18, 2021

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-108

Re: LC 74 – Idaho Power Company’s 2019 Integrated Resource Plan (“IRP”)

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power Company’s Response to STOP B2H Coalition’s Application for Rehearing or Reconsideration.

Please contact this office with any questions.

Thank you,

Jennifer Miller
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 74

In the Matter of

IDAHO POWER COMPANY'S

Second Amended 2019 Integrated
Resource Plan.

IDAHO POWER COMPANY'S
RESPONSE TO
STOP B2H COALITION'S
APPLICATION FOR REHEARING OR
RECONSIDERATION

August 18, 2021

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	RECENT UPDATES ON REFERENCED PROCEEDINGS	2
III.	RESPONSE TO APPLICATION FOR RECONSIDERATION	3
	A. The Allegedly New Information Is Not Essential to the Commission’s IRP Acknowledgment.....	4
	B. Much of the Allegedly New Information Was Already Addressed.	6
	1. B2H Ownership Model Changes Were Addressed in the Second Amended 2019 IRP.....	6
	2. Idaho Power’s PURPA Renewals Were Addressed in the Second Amended 2019 IRP.....	8
	3. Cost Risks of B2H Were Addressed in the Second Amended 2019 IRP.	8
	C. What New Information Exists Supports the Need for B2H and Will Be Analyzed in the 2021 IRP.....	10
IV.	CONCLUSION	12

I. INTRODUCTION

1 The Public Utility Commission of Oregon (“Commission”) acknowledged Idaho Power
2 Company’s (“Idaho Power” or “Company”) Second Amended 2019 Integrated Resource Plan
3 (“IRP”) at the April 15, 2021, Special Public Meeting. The Commission subsequently
4 memorialized its decision on June 4, 2021, in Order No. 21-184. Specifically, the Commission’s
5 decision and subsequent order acknowledged action items associated with the Boardman to
6 Hemingway (“B2H”) transmission project, based on information available “at the time of
7 acknowledgment.”¹

8 Now, the STOP B2H Coalition (“STOP B2H”) claims to have identified new evidence
9 essential to the Commission’s decision and asks the Commission to reconsider and reverse its
10 acknowledgment of the B2H action items. STOP B2H argues that this new information, as well
11 as an alleged “pattern of the [C]ompany not disclosing information[,]” requires reconsideration of
12 Order No. 21-184.²

13 STOP B2H’s Application for Rehearing or Reconsideration (“Application”) is unfounded
14 and should be rejected. STOP B2H appears to misunderstand the ongoing, iterative nature of
15 IRP proceedings and the inevitable need to rely on point-in-time facts to support
16 acknowledgment. Moreover, the facts identified by STOP B2H do not support reconsideration
17 because they are not new, they reinforce the need for B2H, or both.

18 Separately, Idaho Power strongly disagrees with STOP B2H’s allegations that the
19 Company has failed to disclose relevant information in the Second Amended 2019 IRP.
20 Throughout this lengthy proceeding, Idaho Power has clearly and fully responded to parties’
21 comments, proactively raised new developments with the Commission, Staff, and other parties,

¹ *In re Idaho Power Co.’s Second Amended 2019 IRP*, Docket LC 74, Order No. 21-184 at 3 (June 4, 2021).

² Docket LC 74, STOP B2H’s Application for Rehearing or Reconsideration (hereafter, “Application for Reconsideration”) at 3. Note, while STOP B2H titles its Application as a request for “Rehearing or Reconsideration,” the Application itself does not mention or attempt to support the need for rehearing. Idaho Power therefore interprets STOP B2H’s Application as a request for reconsideration only.

1 and has worked closely with the Company’s IRP Advisory Council (“IRPAC”) to provide a robust
2 roadmap for both the 2019 and 2021 IRPs. Notably, STOP B2H has previously leveled such
3 allegations, which were not accepted by the Commission in Order No. 21-184.³ STOP B2H’s
4 allegations of withholding are unsupported.

II. RECENT UPDATES ON REFERENCED PROCEEDINGS

5 Idaho Power offers two updates to the factual background information provided by STOP
6 B2H. First, STOP B2H notes that it is involved in federal litigation attempting to require the
7 Bureau of Land Management (“BLM”) to conduct a Supplemental Environmental Impact
8 Statement (“SEIS”) for B2H.⁴ On August 4, 2021, the federal court rejected STOP B2H’s claim,
9 concluding that STOP B2H and its co-plaintiffs had “fail[ed] to show that significant new
10 information triggered BLM’s obligation to prepare an SEIS.”⁵

11 Second, STOP B2H notes that it is opposing the Oregon Department of Energy’s
12 proposed order for the Energy Facility Siting Council (“EFSC”) to grant a site certificate for B2H,
13 based in part on the claim that B2H is not needed.⁶ On July 29, 2021, the Hearing Officer in the
14 B2H contested case proceeding rejected STOP B2H’s claim and confirmed that Idaho Power
15 has demonstrated the need for B2H, consistent with EFSC’s rules.⁷

³ See, e.g., Docket LC 74, STOP B2H’s Comments at 33 (Jan. 8, 2021) (challenging Idaho Power’s transparency and honesty in its AURORA modeling for market availability); Order No. 21-184 at 14-15 (neither taking up nor accepting STOP B2H’s claims regarding market availability).

⁴ Application for Reconsideration at 2.

⁵ *STOP B2H Coalition et al. v. Bureau of Land Mgmt. et al.*, Case 2:19-cv-01822-SI, Opinion and Order at 23 (Aug. 4, 2021).

⁶ Application for Reconsideration at 2.

⁷ *In the Matter of Boardman to Hemingway*, OAH Case No. 2019-ABC-02833, Ruling and Order on Motions for Summary Determination on Contested Case Issues N-1, N-2, and N-3 (July 29, 2021).

III. RESPONSE TO APPLICATION FOR RECONSIDERATION

1 Under OAR 860-001-0720, reconsideration may be granted where a party presents
2 “[n]ew evidence that is essential to the decision and that was unavailable and not reasonably
3 discoverable before issuance of the order[.]”⁸

4 Here, STOP B2H claims to have “learned of new information” that it believes Idaho
5 Power “knew and should have disclosed in the LC 74 docket.”⁹ Specifically, STOP B2H
6 presents information contained in Idaho Power’s recently filed Quarterly Report to the Securities
7 and Exchange Commission (“SEC”), known as Form 10-Q (“10-Q”),¹⁰ concerning (1) ongoing
8 developments in the co-participant ownership arrangements for B2H; (2) Idaho Power’s recent
9 and pending acquisition of several¹¹ types of new resources; and (3) continued discussion of
10 B2H’s costs and risks.¹² STOP B2H claims that this information is essential to the
11 Commission’s decision and requires reversal of the Commission’s acknowledgment of the B2H
12 action items.¹³

13 STOP B2H’s Application should be denied for three reasons. First, the information
14 identified by STOP B2H is not essential to the Commission’s acknowledgment decision because
15 that decision was explicitly and necessarily based on information available at the time. To the
16 extent any of the information identified by STOP B2H is new, it—by definition—could not have
17 been essential to the Commission’s acknowledgment decision, which was specifically
18 contingent on the facts and information as they existed. Second, much of the information cited

⁸ OAR 860-001-0720(3)(a). STOP B2H does not purport to seek reconsideration based on any alleged error of law or fact essential to the decision (OAR 860-001-0720(3)(b)) or based on other good cause (OAR 860-001-0720(3)(c)).

⁹ Application for Reconsideration at 3.

¹⁰ IDACORP, SEC Filings Details, 10-Q Quarterly Report (July 29, 2021), available at <https://www.idacorpinc.com/investor-relations/sec-filings/sec-filings-details/default.aspx?FilingId=15119262>.

¹¹ To clarify, STOP B2H first refers to “two new resource acquisitions,” (Application for Reconsideration at 4), but goes on to describe three different types of resource acquisitions (Application for Reconsideration at 5). Therefore, Idaho Power interprets STOP B2H as claiming that all three types of resource acquisitions constitute relevant new evidence.

¹² Application for Reconsideration at 4.

¹³ Application for Reconsideration at 4.

1 by STOP B2H is not new, but rather represents the inevitable evolution of facts and
2 circumstances that were already squarely addressed by parties and the Commission in Docket
3 LC 74. Third, the information STOP B2H presents that is new nonetheless fails to support
4 STOP B2H's request for reconsideration because the new evidence reinforces the need for B2H
5 and supports Order No. 21-184.

6 **A. The Allegedly New Information Is Not Essential to the Commission's IRP**
7 **Acknowledgment.**

8 For new information to support reconsideration, it must be essential to the Commission's
9 decision.¹⁴ In the IRP context, a Commission acknowledgment decision is limited to the
10 appropriateness of the utility plan based on the context and information as it exists at the time.¹⁵
11 As the Commission explained in Order No. 21-184, "acknowledgment of an IRP means that the
12 Commission finds that the utility's preferred portfolio and action plan is reasonable *at the time of*
13 *acknowledgment.*"¹⁶ This acknowledgment does not mean that the utility's action plan is fixed
14 regardless of changing circumstances, or that the Commission's evaluation of the utility's
15 decisions will remain the same as facts and circumstances change. Thus, facts and
16 circumstances that change after a Commission's acknowledgment are, by definition, not
17 essential to the Commission's decision.¹⁷

18 Indeed, the Commission was clear in this case that its acknowledgment decision was
19 contingent on the available evidence. As the Commission explained, the "facts, circumstances,
20 and assumptions that supported IRP acknowledgment" could subsequently change, and "any

¹⁴ OAR 860-001-0720(3)(a).

¹⁵ *In re Portland Gen. Elec. Co. 2016 Integrated Resource Plan*, Docket LC 66, Order No. 17-386 at 4 (Oct. 9, 2017) ("In reviewing an IRP, we examine the resource activities in the Action Plan and determine whether to acknowledge them based on the reasonableness of those actions, *given the information available at the time.*") (emphasis added).

¹⁶ Order No. 21-184 at 3 (emphasis added).

¹⁷ Notably, there does not appear to have been any instance of a prior request for reconsideration of a Commission acknowledgment decision. This absence underlines the fact that the inevitable development of new information does not support reconsideration in the context of IRP acknowledgments.

1 such material changes would then be evaluated during later ratemaking proceedings.¹⁸ With
2 respect to B2H in particular, the Commission’s order recognized that changing facts or
3 circumstances might impact the Commission’s future evaluation of Idaho Power’s prudence, or
4 of future IRPs:

5 We find that Idaho Power’s analysis of the project in its IRP
6 comports with our established guidelines and is reasonable, even
7 though we recognize there are still questions to be answered and
8 that future developments, yet to occur, will continue to be
9 reviewed.¹⁹

10 Now, STOP B2H claims that the Commission’s decision to acknowledge B2H-related
11 action items must be reversed because of three alleged changes, reported in Idaho Power’s 10-
12 Q filed on July 29, 2021—all of which occurred after the Commission’s decision was made.²⁰
13 First, in July 2021, Idaho Power and the other B2H co-participants entered into an agreement
14 regarding BPA’s ongoing role in the B2H project. Second, on June 30, 2021, Idaho Power
15 issued a formal request for proposals (“RFP”) for up to 80 MW of new resources to help meet
16 peak energy needs in 2023, and further entered into certain five-year transmission purchase
17 agreements and Public Utility Regulatory Policies Act (“PURPA”) renewals. Third, the Company
18 provided high-level preliminary cost estimates for B2H, which STOP B2H describes as
19 presenting less uncertainty and risk than the Company’s earlier 2019 10-K filing.²¹ Each item
20 identified by STOP B2H as new information arose after the Commission’s April 15 decision and

¹⁸ Order No. 21-184 at 3.

¹⁹ Order No. 21-184 at 16; *see also id.* at 17 (directing Idaho Power to account for changing wildfire risks associated with a changing climate by mid-century, and stating that “[w]e plan to continue to analyze new information regarding this wildfire issue as it becomes available”).

²⁰ Note, STOP B2H states in passing that “SEC FORM 10 – Q is all new evidence that is essential to the [Commission’s] decision[.]” However, Form 10-Q is a lengthy document filed quarterly that provides an ongoing view of a company’s financial position. Much of the information concerns the basic nature of Idaho Power’s business and the regulation of utility operations, etc. *See, e.g.,* Idaho Power’s SEC Q2 2021 Form 10-Q at 18 (detailing the nature and regulation of Idaho Power’s business). Clearly, such basic background information could not reasonably be interpreted as constituting “new evidence.” As a result, this Response addresses only those portions of Form 10-Q specifically identified by STOP B2H as “new.”

²¹ Application for Reconsideration at 7.

1 subsequent June 4 Order—and therefore cannot have been essential to the Commission’s
2 analysis of the facts as they existed “at the time of acknowledgment.”²²

3 **B. Much of the Allegedly New Information Was Already Addressed.**

4 Even if newly available information could support reconsideration of an IRP
5 acknowledgment decision, much of the information STOP B2H presents is not new. Rather,
6 many of the items described in Idaho Power’s 10-Q and identified by STOP B2H consist merely
7 of the ongoing evolution of issues that were squarely presented to and addressed by the
8 Commission in the LC 74 proceeding.

9 1. *B2H Ownership Model Changes Were Addressed in the Second Amended 2019*
10 *IRP.*

11 STOP B2H claims that the most recent 10-Q presents new information pertaining to B2H
12 ownership arrangements, where that form states:

13 In July 2021, the co-participants entered into an agreement and
14 acknowledged that BPA [Bonneville Power Administration] does
15 not intend to participate in the construction of the project or to be a
16 co-owner, in whole or in part, of the project, and that BPA intends
17 to sell its interest in the project to either Idaho Power or a third
18 party. Any changes regarding the ownership structure would be
19 addressed through amended or new funding agreements for the
20 future phases of the project.²³

21 STOP B2H claims that this description amounts to the “dissolution” of the co-participants’
22 ownership arrangement.²⁴ Yet, as the 10-Q clearly states, changes to the B2H ownership
23 structure remain in progress, and will be addressed “through amended or new funding
24 agreements[.]”²⁵

25 Moreover, the arrangement described in the 10-Q is entirely consistent with the
26 proposed ownership changes addressed by Idaho Power and the Commission in Docket LC 74.
27 As Idaho Power explained, the B2H co-participants have been in the process of negotiating

²² Order No. 21-184 at 3.

²³ Idaho Power’s SEC Form 10-Q at 49.

²⁴ Application for Reconsideration at 4.

²⁵ Idaho Power’s Q2 2021 Form 10-Q at 49.

1 possible ownership arrangements that would transition BPA's involvement from direct
2 ownership to funding the line's development through transmission service payments.²⁶ Indeed,
3 Idaho Power first brought the potential change in co-participants' ownership arrangements to
4 the Commission's attention through an update filing on July 1, 2020, while negotiations were still
5 underway.²⁷ As this filing explained:

6 [T]he B2H co-participants are exploring a potential change in the
7 project's ownership arrangement, whereby Idaho Power would
8 acquire Bonneville Power Administration's (BPA) ownership share
9 and provide transmission service to BPA's southeast Idaho
10 customers. Because this ownership arrangement would include a
11 commitment by BPA to fund the incremental cost of Idaho Power's
12 increased ownership percentage through a long-term purchase
13 agreement, the 21 percent ownership percentage assumed in the
14 Amended 2019 IRP continues to provide a reasonable basis for
15 least-cost, least-risk planning for the time being.²⁸

16 The Commission commented on this potential ownership rearrangement in its final order
17 memorializing acknowledgment: "According to current plans, Idaho Power will acquire the BPA
18 ownership share, and BPA would purchase access to B2H through the Company's Open
19 Access Transmission Tariff (OATT)."²⁹ Thus, the Commission recognized that partnership
20 details for B2H were in negotiation, and that BPA was expected to restructure its participation in
21 the project as described in the recent 10-Q.³⁰

22 In sum, the facts have so far progressed consistent with the expectations presented in
23 the Commission's Order, and thus provide no basis for reconsideration.

²⁶ Idaho Power's Final Comments at 5 ("One option for BPA's participation may involve repayment through transmission service, with BPA and/or its customers paying for transmission wheeling under the provisions of Idaho Power's Open Access Transmission Tariff ('OATT') and entering into a transmission service agreement.").

²⁷ Docket LC 74, Update Regarding Boardman to Hemingway Transmission Line Project (July 1, 2020).

²⁸ Docket LC 74, Update Regarding Boardman to Hemingway Transmission Line Project at 5.

²⁹ Order No. 21-184 at 11.

³⁰ Order No. 21-184 at 16.

1 2. *Idaho Power's PURPA Renewals Were Addressed in the Second Amended*
2 *2019 IRP.*

3 STOP B2H notes that Idaho Power recently entered into five new replacement power
4 purchase agreements ("PPAs") with PURPA-qualifying hydropower facilities.³¹ STOP B2H
5 claims that the Company failed to disclose these acquisitions, and that their impact, when
6 combined with other resource acquisitions discussed below, eliminates the need for B2H.³²
7 STOP B2H is incorrect in both respects.

8 First, the acquisition of renewing PURPA resources is not new information because such
9 renewals were clearly addressed in Idaho Power's Second Amended 2019 IRP and
10 accompanying comments.³³ As Idaho Power explained, the Company's analysis assumed that
11 all non-wind QFs providing power under Energy Sales Agreements ("ESAs") will renew as the
12 agreements expire.³⁴ Here, Idaho Power is merely renewing contracts for existing PURPA
13 hydropower Qualifying Facilities ("QFs"), as anticipated.

14 Second, Idaho Power's analysis of long-term resource needs already assumed the
15 renewal of non-wind QFs.³⁵ As a result, the fact that Idaho Power is acting consistent with the
16 modeling in its Second Amended 2019 IRP does not undermine the need for B2H in 2026.

17 3. *Cost Risks of B2H Were Addressed in the Second Amended 2019 IRP.*

18 Finally, STOP B2H states that Idaho Power's most recent 10-Q reflects *less* risk and
19 uncertainty for B2H than the discussion presented by STOP B2H in Docket LC 74, and by Idaho
20 Power in a 2019 10-K filing.³⁶ The significance of this statement is not entirely clear, as reduced
21 risks associated with B2H's development supports Commission acknowledgment. However,
22 STOP B2H goes on to state that the uncertainties and risks identified in the 2019 10-K filing

³¹ Application for Reconsideration at 6.

³² Application for Reconsideration at 6.

³³ See, e.g., Idaho Power's Final Comments at 66.

³⁴ Idaho Power's Final Comments at 66.

³⁵ Idaho Power's Final Comments at 66.

³⁶ Application for Reconsideration at 7 ("STOP's final comments [p 15] on Idacorp's and Idaho Power's 2019 10-K filing shared multiple uncertainties and risks greater than the one above that the [C]ompany stated[.]") (first bracketed language STOP B2H's).

1 “were shared with investors and shareholders but not [with] the Commission, interven[o]rs, or
2 ratepayers.”³⁷ STOP B2H’s reliance on the 2019 10-K is unavailing for three reasons.

3 First, the risks and uncertainties described in the Company’s 2019 10-K concerned B2H
4 in a very limited degree. Rather, this discussion addressed cost risks for everything from fuel
5 commodity prices, the extent of third-party renewable resource development, and the
6 economics and logistics of plant retirements. The sole discussion of risk and uncertainty
7 concerning B2H in this cited excerpt addressed the “actual completion date” of B2H.

8 Second, the Company’s 2019 10-K was information available to parties when the
9 Commission made its acknowledgement decision. Clearly, the Company’s publicly filed
10 description of costs and risks associated with B2H in 2019 was available and reasonably
11 discoverable before issuance of the Commission’s order.³⁸

12 Third, uncertainties and risks are an integral part of the IRP process, and were
13 addressed throughout the Company’s filings and comments.³⁹ Indeed, the Commission
14 recognized the potential cost risks associated with B2H in its final order:

15 We recognize the uncertainties surrounding this project, including
16 cost, cost risks, partnerships, and market depth. We also
17 recognize that these risks and uncertainties must be evaluated in
18 a context of potentially significant opportunities and benefits,
19 including enabling better regional integration of low-cost
20 renewables, allowing clean energy goals to be met at a lower cost
21 to consumers, advancing regional reliability, and avoiding the
22 need to meet large-scale capacity needs with new fossil fuel
23 infrastructure that is at risk of being economically stranded.⁴⁰

24 In sum, there is no basis for concluding that the Company’s most recent summary
25 statement of cost risks associated with B2H constitutes new evidence unavailable to the
26 Commission or parties prior to the acknowledgment decision in this proceeding.

³⁷ Application for Reconsideration at 7.

³⁸ OAR 860-001-0720(3)(a).

³⁹ See, e.g., Idaho Power’s Final Comments at 12 (discussing the cost contingency estimates for B2H).

⁴⁰ Order No. 21-184 at 15.

1 **C. What New Information Exists Supports the Need for B2H and Will Be Analyzed in**
2 **the 2021 IRP.**

3 STOP B2H points to two additional resource acquisition efforts not specifically
4 addressed in the Company's Second Amended 2019 IRP as requiring reconsideration and
5 reversal of the Commission's acknowledgment decision—namely, (1) Idaho Power's recent
6 issuance of an RFP for up to 80 MW of new energy and capacity resources to meet peak
7 energy need in 2023, and (2) two new five-year transmission purchase agreements ("TPAs").
8 STOP B2H claims that these resource acquisitions, together with the PURPA renewals
9 described above, void the need for B2H in 2026. However, neither of these resource acquisition
10 efforts undermine the need for B2H.

11 First, Idaho Power's need for 80 MW of new energy and capacity resources to meet
12 peak energy need in 2023 was identified through the Valmy Unit 2 Exit Analysis.⁴¹ This analysis
13 was conducted consistent with Action Item Number 9 in Idaho Power's Second Amended 2019
14 IRP.⁴² While the results of this analysis were not known prior to the Commission's
15 acknowledgment decision, they indicate an even *greater* need for energy and capacity than
16 previously understood—reinforcing the need for B2H to serve load in 2026.⁴³ Thus, while STOP
17 B2H is correct that there have been changes in both generation need and capacity deficits since
18 the Second Amended 2019 IRP was acknowledged, the result of these changes does not
19 support reversal of the Commission's acknowledgment of B2H-related action items. Notably,

⁴¹ Docket LC 74, Idaho Power Co.'s Valmy Unit 2 Exit Analysis (Aug. 4, 2021).

⁴² Order No. 21-184 at 9 ("Action item no. 9 is a focused economic and system reliability analysis to further inform the exit date for Valmy Unit 2. We direct Idaho Power to provide the results of the analysis in its 2021 IRP to either confirm the proposed 2022 exit or provide clarification on next steps in the event the early exit is not supported by analysis.").

⁴³ Docket LC 74, Idaho Power Co.'s Valmy Unit 2 Exit Analysis at 5 (noting that "the existing resource availability was revised to include updated thermal capacity and reduced demand response capacity determined through the refinement of the planning margin calculation[,] which resulted in "a reduction of approximately 480 MW – 500 MW in available capacity each July during the 2022 through 2025 time period").

1 Idaho Power has already presented the implications of the Valmy Unit 2 Exit Analysis to the
2 IRPAC and is incorporating this analysis into the 2021 IRP.⁴⁴

3 Second, the Company’s recent five-year TPAs are irrelevant to the need for B2H. These
4 TPAs allow the Company to secure appropriate transmission rights to ensure continued access
5 across constrained transmission to the Mid-C market hub. Historically, the Company would
6 secure this transmission for a shorter term; however, recent transmission reservation activity in
7 the market required the Company to establish a longer-term transmission position. Available
8 market purchases across this transmission were already factored into the 2019 IRP. Plainly, the
9 acquisition of transmission capacity for market purchases already incorporated into the IRP
10 does not eliminate the need for B2H.

11 In sum, the resource acquisitions described in Idaho Power’s 10-Q do not support
12 reconsideration or reversal of the Commission’s decision to acknowledge B2H-related action
13 items.

14 //
15 //
16 //
17 //
18 //
19 //
20 //
21 //
22 //
23 //

⁴⁴ See, *Valmy Unit 2 Study Update*, Presentation to IRPAC (Apr. 8, 2021), available at https://docs.idahopower.com/pdfs/AboutUs/PlanningForFuture/irp/2021/ValmySpecialStudyUpdateIRPAC_2.pdf.

IV. CONCLUSION

1 The Commission's decision to acknowledge the B2H-related action items in Idaho
2 Power's Second Amended 2019 IRP was reasonable, consistent with the available facts, and
3 remains supported by the available evidence. The Commission should reject STOP B2H's
4 request for reconsideration as unnecessary and unsupported.

Respectfully submitted this 18th day of August 2021.

MCDOWELL RACKNER GIBSON PC



Lisa F. Rackner

IDAHO POWER COMPANY

Lisa Nordstrom
1221 West Idaho Street
P.O. Box 70
Boise, Idaho 83707

Attorneys for Idaho Power Company