Docket PCN 5: Idaho Power Company's Petition for Certificate of Public Convenience and Necessity

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September 30, 2022

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
201 High Street S.E., Suite 100
Salem, OR 97308-1088

Re: Docket No. PCN 5 – In the Matter of Idaho Power Company's Petition for Certificate of Public Convenience and Necessity.

Attention Filing Center:

Attached for filing in the above-referenced docket is Idaho Power Company's Petition for a Certificate of Public Convenience and Necessity. Confidential copies are being sent via Huddle or encrypted zip file to the Filing Center and parties who have signed Protective Order No. 22-309.

Please contact this office with any questions.

Thank you,

Alisha Till
Paralegal

Attachments

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

PCN 5

In the Matter of IDAHO POWER COMPANY'S PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY.	**IDAHO POWER COMPANY'S PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

In accordance with Oregon Revised Statute (ORS) 758.015 and Oregon Administrative Rule (OAR) 860-025-0030, OAR 860-025-0035, and OAR 860-025-0040,[1] Idaho Power Company (Idaho Power or Company) petitions the Public Utility Commission of Oregon (Commission) for a Certificate of Public Convenience and Necessity (CPCN) authorizing construction of a 300-mile long, overhead, 500-kV high voltage transmission line between the proposed Longhorn Station near Boardman, Oregon, to the existing Hemingway Substation in southwest Idaho (B2H project). In support of this Petition, Idaho Power relies in part on the pre-filed testimony and exhibits of Jared L. Ellsworth, Transmission, Distribution & Resource Planning Director, and Lindsay Barretto, 500-kV and Joint Projects Senior Manager.

I. INTRODUCTION

Idaho Power is an energy company engaged in the generation, transmission, delivery, sale and purchase of electricity and is regulated by the Federal Energy

[1] Idaho Power is filing the Petition in accordance with the rules adopted by the Commission in the Docket AR 626 Rulemaking Proceeding on September 26, 2022, pursuant to Order No. 22-351. *See In re Rulemaking Regarding Certificate of Public Convenience and Necessity*, Docket AR 626, Order No. 22-351 (Sept. 26, 2022).

Regulatory Commission (FERC), the Commission, and the Idaho Public Utilities Commission. Idaho Power serves more than 600,000 customers in a 24,000-square mile service area across southern Idaho and eastern Oregon. With 17 low-cost hydroelectric projects as the core of the Company's energy mix, Idaho Power's residential, business and agricultural customers pay some of the nation's lowest prices for electricity. Idaho Power has set a goal of providing 100 percent clean energy by 2045 while continuing to keep prices low and reliability high.

Since 1996, firm peak-hour load has increased from 2,437 megawatts (MW) to 3,751 MW in 2021 – a new system peak hour record reached on June 30, 2021. The Company anticipates adding approximately 13,300 customers each year throughout the next 20 years, including significant commercial and industrial growth. The anticipated load forecast for the entire system predicts summer peak-load requirements will grow nearly 55 MW per year, and the average energy requirement is forecast to grow about 30 average Megawatt (aMW) per year. To meet this growing demand, Idaho Power's 20-year resource plan[2] includes the addition of 3,790 MW of new non-carbon emitting resources consisting of wind, solar, and storage technologies, the addition of the B2H transmission line, and a variety of demand-side management resource additions.

Once operational, the B2H project will provide the Company increased year-round access to reliable, clean, and low-cost market energy purchases from the Pacific Northwest, including during those times when energy demand from Idaho Power's customers is at its highest. The B2H project has been a cost-effective resource identified

[2] *See In re Idaho Power Company, 2021 Integrated Resource Plan*, Docket LC 78, Idaho Power's 2021 Integrated Resource Plan (IRP) (Dec. 30, 2021)..

in each of Idaho Power's Integrated Resource Plans (IRP) since 2009 and continues to be a cornerstone of the Company's 2021 IRP Preferred Portfolio. As can be seen in the 2021 IRP, the lowest-cost resource portfolio includes B2H, and the best non-B2H portfolio has a significant cost premium. As a resource alone, B2H is the lowest-cost alternative to serve Idaho Power's customers in Oregon and Idaho. As a transmission line, B2H also offers incremental ancillary benefits and additional operational flexibility.

The development and construction of high-voltage transmission lines is also critical to a clean energy future. According to recent research provided by Princeton University, the United States will need to expand electricity transmission systems by 60 percent by 2030, and may need to triple it by 2050, to meet clean energy goals. Putting an even finer point on it, researchers stated:

> The current power grid took 150 years to build. Now, to get to net-zero emissions by 2050, we have to build that amount of transmission again in the next 15 years and then build much more again in the 15 years after that.[3]

B2H is considered a piece of that clean energy puzzle. In 2012, the White House identified B2H as one of seven lines that were critical to our enhancing our nation's energy portfolio and fostering the growth of renewable energy resources.[4] Later, in 2021, Americans for a Clean Energy Grid identified B2H as one of the 22 shovel ready infrastructure projects needed to unlock and interconnect 60,000 MW of new renewable capacity.[5] The B2H

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[3] Molly Seltzer, *et al.*, *Big but affordable effort needed for America to reach net-zero emissions by 2050, Princeton study shows*, PRINCETON UNIV. (Dec. 15, 2020) (available at https://www.princeton.edu/news/2020/12/15/big-affordable-effort-needed-america-reach-net-zero-emissions-2050-princeton-study) (last visited Sept. 30, 2022).

[4] DEP'T OF ENERGY, *Obama Administration Announces Job-Creating Grid Modernization Pilot Projects* (Oct. 5, 2011) (available at https://www.energy.gov/articles/obama-administration-announces-job-creating-grid-modernization-pilot-projects) (last visited Sept. 30, 2022).

[5] Michael Goggin, *et al.*, GRID STRATEGIES, LLC, *Transmission Projects Ready to Go: Plugging into America's Untapped Renewable Resources* at 5 (Apr. 2021) (available at https://cleanenergygrid.org/wp-content/uploads/2021/09/Transmission-Projects-Ready-to-Go.pdf) (last visited Sept. 30, 2022).

project is necessary to integrate and balance variable energy resources, like wind and solar, by facilitating the transfer of geographically diverse renewable resources across the western grid. This will be particularly important as states such as Oregon and Washington progress with their clean energy goals.

II. COMMUNICATIONS

Idaho Power respectfully requests that all communications with reference to this Application be sent to the following:

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III. LEGAL STANDARD

ORS 758.015 requires electric utilities to petition the Commission for a CPCN if condemnation of land or an interest therein is necessary for construction of a transmission line. This Petition is being filed in accordance with the Commission's updated CPCN rules adopted in Docket AR 626 on September 26, 2022. Upon receipt of a petition for a CPCN, the Commission must conduct an investigation to "determine the necessity, safety, practicability and justification in the public interest for the proposed transmission line...."[6] The Commission considers the "public interest" when addressing each of these requirements, not as a separate standard.[7]

[6] ORS 758.015(2).

[7] See *Pacific Power Petition for Public Convenience and Necessity*, UM 1495, Order No. 11-366 (Sept. 22, 2011).

The Commission's review criteria are set forth in OAR 860-025-0035(1) and (2):

A. OAR 860-025-0035(1):

The Commission may approve a petition filed under OAR 860-025-0030 by determining the necessity, safety, practicability and justification in the public interest of the proposed transmission line upon consideration of the following:

(a) Whether the transmission line will meet a demonstrated need for transmission of additional capacity or improved system reliability that enables the petitioner to provide or continue to provide adequate and reliable electricity service;

(b) Whether the petitioner has demonstrated that it will ensure the transmission line is constructed, operated, and maintained in a manner that protects the public from danger and conforms with applicable Commission rules, and other applicable safety standards and best industry practices;

(c) Whether the transmission line using petitioner's proposed route is practicable and feasible, whether it will be effectively and efficiently constructed in a commercially reasonable manner;

(d) Whether petitioner has justified construction of the proposed transmission line as in the public interest, as compared with feasible alternatives for meeting the identified need, considering the public benefits and costs of the project, as they relate to the interests in land proposed to be condemned, petitioner's existing facilities and equipment, petitioner's Oregon customers, and other considerations that may be relevant to the public interest. Other such considerations include, but are not limited to, the benefits and costs to other Oregon utilities, their customers, and all Oregonians, the value of connections to

regional and interregional electricity grids and to a petitioner's non-Oregon service territories, and all Oregonians;

(e) The Commission may also consider other factors it deems relevant to the statutory criteria.

B. OAR 860-025-0035(2):

In evaluating a petition under this rule, the Commission will give due consideration to related regulatory reviews and permitting approvals as pertinent to the proposed transmission line, if the transmission line has already been acknowledged or approved by regulatory or permitting authorities.

The Commission also considers whether the transmission line is compatible with state and local land use regulations.[8] For an EFSC-jurisdictional project, the Commission relies on the land use findings adopted as part of the site certificate to satisfy its obligations to consider compliance with state and local land use regulations.[9]

IV. PROPOSED SCHEDULE

On September 1, 2022, the Company filed with the Commission a Notice of Intent to file a Petition for a CPCN, opening the docket for this proceeding. The Company also included a proposed schedule with that filing, requesting a Commission decision in this proceeding no later than May 5, 2023, to allow for construction to begin in 2023 and to allow for energization in time to meet the 2026 resource deficit projected in the Company's IRP. To aid parties in review of the request in this proceeding, the Company also filed its

[8] OAR 860-025-0040(1).
[9] OAR 860-025-0040(1).

responses to the Standard Data Requests[10] via the Commission's Huddle site pursuant to OAR 860-025-0030(2)(q) at the time of the Notice of Intent filing.

ORS 758.015(2) requires the Commission to give notice of this Petition and to hold a public hearing. As part of the Notice of Intent, Idaho Power prepared a proposed schedule, including a proposed public hearing date, that would allow for a final order by May 5, 2023. A prehearing conference is scheduled for October 11, 2022. The following is the schedule proposed by the Company and included in the Notice of Intent but with a revised prehearing conference date as set by the Commission and resulting revision to the Public Comment Hearing and Petition to Intervene dates as well as the removal of the date identified for the Commission's consideration of the Request for Waiver, which is no longer applicable following the September 27, 2022, EFSC decision.

EVENT	**DATE**
Idaho Power files Notice of Intent to file Petition and Standard Data Requests	9/1/2022
Idaho Power files Petition for CPCN and Testimony	9/30/2022
Prehearing Conference	10/11/2022
Public Comment Hearing	10/11/2022
Petitions to Intervene	10/18/2022
Staff and Intervenor Opening Testimony	11/23/2022
Company Reply Testimony	1/26/2023
Witness List, Cross-Examination Statements and Exhibits	2/2/2023
Evidentiary Hearing	2/14/2023, 2/15/2023
All Party Opening Briefs	3/7/2023
All Party Reply Briefs	3/21/2023
Final Order	5/5/2023

[10] The Standard Data Requests (SDRs) are referenced under proposed OAR 860-025-0030(2)(q). Idaho Power's September 1, 2022 SDR response filing was based on the June 2022 draft Standard Data Requests; Idaho Power expects to supplement its filing based on any additional Standard Data Requests that are issued following approval of the rules in AR 626.

The schedule proposed by Idaho Power, and in particular the May 5, 2023, date for a final Commission decision, is critical to allowing the Company to meet its expected in-service deadline of mid-2026. To begin construction in 2023, the Company will need access to the affected parcels. Idaho Power is currently negotiating with landowners in good faith to obtain options for easements, however, Idaho Power anticipates it may need to initiate condemnation proceedings to gain access to certain parcels along the B2H project route. If the Commission's order in this proceeding is delayed beyond May 2023, Idaho Power likely will not be able to gain access to the affected parcels in time to begin construction in 2023 and accordingly to meet the B2H project's 2026 in-service date.

V. BACKGROUND

In 2018, Idaho Power submitted its complete application for an Energy Facility Siting Council (EFSC or Council) site certificate to construct the portions of the B2H project located in Oregon. As part of that application, the Company has requested that the site certificate include and govern the local land use approvals related to siting. In July 2020, the Oregon Department of Energy (ODOE) issued its Proposed Order, proposing approval of the B2H project subject to certain conditions. The EFSC then initiated a contested case hearing process that included exchange of discovery, live depositions, submission of written testimony, live cross-examination hearings, and extensive briefing. On May 31, 2022, following the conclusion of the nearly-two-year-long contested case, the hearing officer issued the Proposed Contested Case Order, proposing approval of the B2H project subject to certain conditions.[11] The Council held a three-day hearing to

[11] See In re the Application for Site Certificate for the Boardman to Hemingway Line, OAH Case No. 2019- ABC-02833, Proposed Contested Case Order at 296 of 337 (May 31, 2022), available at

consider the parties' exceptions to the Proposed Contested Case Order, ODOE issued the draft Final Order on September 16, 2022, and on September 27, 2022, EFSC made its final decision approving the B2H project subject to certain conditions.[12] The Final Order and Site Certificate include the land use approvals (and related conditions) for the B2H project, and in accordance with ORS 469.401(3), following issuance of the site certificate, the state and local agencies will issue the permits and land use approvals governed by the site certificate without further hearings or other proceedings.

Currently, the B2H project is moving into the preliminary construction phase. On January 18, 2022, and after significant discussions, study efforts, and negotiations, the three B2H permit funding participants, Idaho Power, PacifiCorp, and Bonneville Power Administration (BPA), executed a Non-Binding Term Sheet that addresses B2H ownership, transmission service considerations, and asset exchanges (Term Sheet). In April 2022, the Company awarded a contract for constructability consulting services, which indicated that construction must start in the summer of 2023 to ensure energization in time to meet the 2026 resource deficit identified in Idaho Power's 2021 IRP. Idaho Power anticipates issuing a Requests for Proposals for materials and subcontractors necessary for construction to commence in the first quarter of 2023. As explained in more detail below, the Company is submitting this Petition prior to obtaining the outstanding permits and approvals due to scheduling constraints. It should be noted however that

https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2022-05-31-B2HAPP-Hearing-Officer-Proposed-Contested-Case-Order-w-Bookmarks.pdf ("I propose the Oregon Department of Energy, Energy Facility Siting Council, issue a Final Order granting the requested site certificate consistent with the Department's Proposed Order dated July 2, 2020, including the recommended site certificate conditions, and incorporating the following amendments to recommended conditions: . . . .").

[12] Idaho Power understands that EFSC will issue the Final Order and Site Certificate on or shortly after September 30, 2022.

Idaho Power's request in this case does not eliminate or circumvent any approval processes associated with the B2H project, but rather allows the processes to run concurrently to ensure the B2H project can be energized by the 2026 in-service date.

VI. COMPLIANCE WITH OAR 860-025-0030 FILING REQUIREMENTS

A. OAR 860-025-0030(2)(b):

Thorough description of the proposed transmission line. A thorough description of the information listed in subsection (c) of this rule, including but not limited to the proposed route, voltage and capacity of the line. The description must include a comprehensive narrative that provides sufficient detail to enable a full understanding of the public convenience, necessity and justification in the public interest for the proposed transmission line and the benefits to be derived therefrom, and to enable a determination of its safety and practicability under normal and emergency conditions, as well as the foreseeable or potential consequences of not building the proposed transmission line.

Once operational, the B2H project will help meet the Pacific Northwest and Mountain West's need for reliable, clean, low-cost market energy purchases year-round and is expected to provide a total of 2,050 megawatts (MW) of bidirectional capacity.[13] The new transmission line will provide Idaho Power and its customers with many benefits, including (1) greater access to the Pacific Northwest electric market, (2) improved system reliability and resiliency, (3) reduced capacity limitations on the regional transmission systems as demands on the system continue to grow, and (4) flexibility to integrate renewable resources and more efficiently implement advanced market tools, such as the

[13] B2H is expected to provide 1,050 MW of capacity in the west-to-east direction, and 1,000 MW of capacity in the east-to-west direction.

Energy Imbalance Market. The direct testimony of Mr. Ellsworth discusses the benefits and values of the B2H project in detail.[14] The benefits of the B2H project in aggregate reflect its importance to the achievement of Idaho Power's goal to provide 100 percent clean energy by 2045 without compromising the Company's commitment to reliability and affordability.[15]

The Resource Need. The B2H project was first included in the Preferred Portfolio of Idaho Power's 2006 IRP, and subsequently identified as part of the preferred portfolio in the Company's 2009, 2011, 2013, 2015, 2017, 2019, and most recently, in the 2021 IRP. The Commission has acknowledged the B2H project in the Action Plans of Idaho Power's 2017 IRP and 2019 IRP. Acknowledgement of the 2021 IRP is pending with the Commission. In addition to the IRPs, the B2H project has been identified as a regionally significant project, producing a more efficient or cost-effective plan in the Northern Tier Transmission Group's (NTTG) 2007, 2009, 2011, 2013, 2015, 2017, and 2019 biennial regional transmission plans, and in the NorthernGrid, NTTG's successor regional planning organization, 2021 biennial regional transmission plan.[16] The B2H project is demonstrated to be the most cost-effective method of serving projected customer demand and meeting clean energy goals.

In the 2021 IRP, as has been the case in prior IRPs, the B2H project is not simply evaluated as a transmission resource, but rather as a supply-side resource that will be used to serve Idaho Power load. That is, the B2H project, and the market purchases it

[14] *See* Idaho Power/100, Ellsworth.
[15] Idaho Power/100, Ellsworth/49.
[16] *See* Exhibit Idaho Power/203, Barretto/479-899 (The NTTG and NorthernGrid biennial regional transmission plans were provided as attachments to the Company's Response to Standard Data Request No. 5.).

will facilitate, are evaluated in the same manner as a new gas plant, or a new utility-scale solar plus storage project. In addition, as a transmission line, B2H offers incremental ancillary benefits, additional operational flexibility. Company witness Mr. Ellsworth presents the results of the 2021 IRP modeling showing that the Preferred Portfolio that includes the B2H project is, on a net present value, $266 million lower cost than the lowest cost portfolio that does not include the B2H project, and best minimizes both cost and risk.[17]

The B2H project's current planned in-service date of summer of 2026 is necessary to meet forecasted peak demand growth needs, as well as to fill in for the Valmy Unit 2 exit occurring at the end of 2025, and to facilitate the exit of Bridger Unit 3, also currently identified in the 2021 IRP for early exit at the end of 2025. Should the B2H in-service date slip to 2027, the planned exit of Bridger Unit 3 will most likely be delayed, and additional new resources will need to be acquired by 2026 that are not dependent on B2H transmission capacity, which at this time is estimated to be an additional 375 MW of capacity, or 550 MW of capacity if the Company moves forward with the Bridger Unit 3 exit.

The B2H Project. The B2H project will occur on federal, state, and private lands in five counties in Oregon and one county in Idaho. It consists of approximately 298 miles of electric transmission line, with 274 miles located in Oregon and 24 miles in Idaho.[18] The project will require 298 miles of single-circuit 500-kV transmission line, removal of 12 miles of existing 69-kV transmission line, rebuilding of 0.9 mile of a 230-kV transmission

[17] Idaho Power/100, Ellsworth/32-33.
[18] Idaho Power/200, Barretto/2.

line, and rebuilding of 1.1 miles of an existing 138-kV transmission line into a new right-of-way (ROW).[19] The B2H project will connect to the planned Longhorn Substation four miles east of Boardman, Oregon and to the Company's existing Hemingway Substation in Owyhee County, Idaho. A series capacitor station will be constructed near the mid-point of the transmission line as part of the B2H project. For ease of reference, the Longhorn substation, mid-line station, and the existing Hemingway substation are referred to simply as "stations."

The proposed stations will serve to connect the B2H project to other 500-kV transmission lines and the Pacific Northwest power market, increasing the capacity to Idaho Power's service area, adding 1,050 MW of capacity to the Idaho to Northwest path in the west-to-east direction, and 1,000 MW of capacity from east-to-west.[20] The Company's ownership share of that capacity is an average of 750 MW west-to-east of which Idaho Power plans to utilize 500 MW the summer months (April–September) and 200 MW in the winter months (January–March and October–December) to serve its native customers.[21] In addition, there remains 400 MW of unallocated capacity east-to-west of which 182 MW of the capacity is expected to be allocated to Idaho Power.[22]

The B2H project will also include approximately 10 communication station sites, consisting of communication shelters and related facilities, two alternative communication station sites, and a series capacitor station. Other related and supporting facilities include access roads for the proposed route, including approximately 206 miles of new roads and 223 miles of existing roads requiring substantial modification. Finally, there will be

[19] *Id*.
[20] Idaho Power/100, Ellsworth/23.
[21] Idaho Power/100, Ellsworth/7.
[22] Idaho Power/100, Ellsworth/7-8.

approximately 30 temporary multi-use areas and 299 temporary pulling and tensioning sites, of which four will have light-duty fly yards within the pulling and tensioning sites.

Safety, reliability, and electrical performance are all incorporated into the design of transmission lines. With respect to safety, the National Electrical Safety Code (NESC) provides for minimum guidelines and industry standards for safeguarding persons from hazards arising from the construction, maintenance, and operation of electric supply and communication lines and equipment.[23] The B2H project is designed to withstand a wide range of physical conditions and extreme events, explained in greater detail in the direct testimony of Ms. Barretto.[24] Because transmission lines are so vital to our electrical grid, design standards are stringent. B2H will adhere to, and in most cases, exceed, the required codes or standards observed for high voltage transmission line design.[25] This approach to the design and construction of the B2H project will establish the utmost safe and reliable operation of the transmission line over its life.

Additional narrative discussion of the spatial information listed in (c) is provided in Section V.B, below.

B. OAR 860-025-0030(2)(c): Spatial information. A map or maps that are drawn to appropriate scale and show appropriate distinguishing colors and symbols to depict the following information:

OAR 860-025-0030(2)(c)(A). *A general location and boundaries of petitioner's service area to be connected or served by the proposed transmission line.*

[23] Idaho Power/200, Barretto/3-4.
[24] *See* Idaho Power/200, Barretto/3-10.
[25] Idaho Power/200, Barretto/4.

See Attachment 1 for a map of Idaho Power's service area. The B2H project will connect resources in the Pacific Northwest to the Company's transmission system.

OAR 860-025-0030(2)(c)(B). *Proposed route, voltage and capacity of the proposed transmission line.*

See Attachment 2 for a map of the proposed route of the B2H project, which consists of 278 miles of electric transmission line, with 274 miles located in Oregon and 24 miles in Idaho, including 298 miles of single-circuit 500-kV transmission line, 0.9 mile of a 230-kV transmission line, and 1.1 miles of a 138-kV transmission line.

In the EFSC application, Idaho Power included a "Proposed Route" and alternative route segments in certain areas. Idaho Power included two alternative route segments in the La Grande area in its EFSC application, which are called the Morgan Lake Alternative and the Mill Creek Alternative/Proposed Route. Additionally, the EFSC application included alternative route segments at the northern end of the B2H project, near the Boardman Bombing Range, and toward the southern end of the Project in Malheur County near the Double Mountain Wilderness Characteristic Unit. With approval of the Company's application for the B2H project on September 27, 2022, the Council approved the proposed route and all of the proposed alternative segments, providing Idaho Power the option to develop a final route among the alternatives. The route depicted in Attachment 2 represents the Company's final route choice among the alternatives approved by EFSC, which include the proposed route as modified by the Morgan Lake Alternative and the West of Bombing Range Alternative 1 routes. In this Petition, Idaho Power is seeking condemnation authority only for properties along the final

route choice, and not for alternative segments included in the EFSC application but not chosen as part of the final route.

Morgan Lake Alternative. In the EFSC application, Idaho Power's proposed route in Union County ran parallel to an existing 230-kV transmission line along the hillside west of the City of La Grande. That route was referred to as the Mill Creek Route. In that same area, Idaho Power proposed the Morgan Lake Alternative as an alternative to the Mill Creek Route, providing a route that was farther from and not visible from the City of La Grande. Based on feedback Idaho Power received from the local community and given EFSC approved both routes, Idaho Power has decided to develop the Morgan Lake Alternative and not the Mill Creek Route.

West of Bombing Range Road Alternative 1. At the time of development of the Application for Site Certificate (ASC), Idaho Power was pursuing an easement from the Department of the Navy for access across the Naval Weapons Systems Training Facility Boardman along Bombing Range Road (the Boardman Bombing Range). In the ASC, Idaho Power included two alternative routes in that area, given the uncertainty of whether, and to what extent, the Navy would grant an easement. In 2020, the Navy granted an easement across a portion of the Boardman Bombing Range. The West of Bombing Range Alternative 1 represents the access granted by the Navy in that area.

OAR 860-025-0030(2)(c)(C). *Available alternate transmission line routes analyzed by petitioner, if any.*

As stated previously, the need for the B2H project was first identified in the 2006 IRP. At that time, the transmission line was contemplated as a line between Boise and McNary. The project evolved into a 500-kV line between the Boardman area and the

Hemingway station. In 2008, Idaho Power initiated a year-long comprehensive public process to gather more input. Through the Community Advisory Process (CAP), the Company hosted 27 Project Advisory Team meetings, 15 public meetings, and 7 special topic meetings. In all, nearly 1,000 people were involved in the CAP, either through Project Advisory Team activities or public meetings. A considerable number of routes through western, central, and eastern Oregon, and southern Washington were considered to connect Hemingway and the Boardman area. Attachment 3 is a map of the routes considered during this timeframe.

Ultimately, the route recommendation from the CAP was the route Idaho Power brought into the National Environmental Policy Act (NEPA) process as the proponent-recommended route. Attachment 4 is a map of the proposed route resulting from the CAP process and submitted as the Company's proposed route in the Bureau of Land Management (BLM)-led NEPA process. Throughout the NEPA process, Idaho Power continued to work with landowners, stakeholders, and jurisdictional leaders on route refinements and to balance impacts to various natural resources with impacts to farmers and ranchers. The BLM considered the Company's proposed route, along with a few other alternative routes, in the NEPA process. Attachment 5 shows the route alternatives and variations considered in the BLM's November 2016 Final Environmental Impact Statement. Ultimately, the route selected through the BLM-led NEPA process, based on the BLM's analysis and public input, led do a singular route, presented in Attachment 6.

The route Idaho Power submitted in its EFSC application, a separate and distinct process from the NEPA process, is very similar in most areas to the BLM's selected route. As discussed earlier, in the EFSC application, Idaho Power included a "Proposed Route"

and alternative route segments in certain areas. See Attachment 7 for the maps submitted with the EFSC application.

OAR 860-025-0030(2)(c)(D). *Other transmission lines and substations of petitioner connecting, serving or capable of being adopted to connect or serve the areas covered by the proposed transmission line, if any.*

As explained in the direct testimony of Mr. Ellsworth, the Pacific Northwest is a winter peaking region and Idaho Power operates a system with an early summer peak (i.e. late June, early July) which aligns with the Mid-C hydro runoff conditions when the Pacific Northwest is flush with surplus power capacity. Attachment 8 presents a map of the Company's existing transmission system. Idaho Power owns 1,280 MW of transmission capacity between the Pacific Northwest transmission system and the Company's service territory. Of this, 1,200 MW are on the Idaho to Northwest path and 80 MW are on the Montana-Idaho path. Avista, BPA, and PacifiCorp share an allocation of capacity on the western side of the Idaho to Northwest path and Idaho Power owns 100 percent of the capacity on the eastern side. The Company fully utilizes the capacity of these lines. Constructing the B2H project will alleviate this constraint and add 1,050 MW of total transfer capability between the Pacific Northwest and the Intermountain West region, providing a cost-effective method of serving projected customer demand while also offering incremental ancillary benefits and additional operational flexibility.

OAR 860-025-0030(2)(c)(E). *The terminals, substations, sources of energy, and load centers, existing or proposed, related to the proposed transmission line and its intended operation, including the proposed transmission line itself.*

See Attachment 2 for a map of the proposed B2H project route, including the proposed terminals and substations. Under the Term Sheet, Idaho Power will secure 500 MW of point-to-point transmission service from BPA from the Mid-Columbia (Mid-C) hub to the proposed Longhorn station, which will provide the Company a direct connection to the Mid-C market with flexible long-term BPA wheeling rights. The B2H project will enable additional purchased power from the Mid-C hub at both peak times and when energy prices are favorable relative to the costs of Idaho Power's existing resource fleet, leveraging diversity that exists in the region.

In addition, the Company will acquire from PacifiCorp transmission assets and their related capacity sufficient to enable Idaho Power to utilize 200 MW of bidirectional transmission capacity between the Company's system, at Populus, and Four Corners the desert Southwest market hub.[26] Eight entities with transmission have connectivity to the Four Corners market hub. Idaho Power will also have a connection to entities at Mona in central Utah.[27] This additional capacity should provide the Company with long-term strategic value diverse from B2H: the desert Southwest is rich with solar potential which is expected to continue its significant growth in the future, New Mexico has significant wind potential, and the number of desert Southwest entities with a presence at this market hub presents significant market diversity opportunities.[28] Idaho Power believes additional access to this market hub during the winter months will prove to be extremely valuable in a low carbon future.[29] Attachment 9 illustrates capacity gained to both Mid-C and the Four Corners markets, reflecting the B2H project's market diversity.

[26] Idaho Power/100, Ellsworth/40-41.
[27] *Id*. at 41.
[28] *Id.*
[29] *Id*.

Among the benefits the B2H project will provide is the ability to improve renewable integration.[30] The lack of transmission capacity, at times, prevents the energy from existing renewable generation to move to load and can be curtailed. The B2H project is necessary to integrate and balance variable energy resources like wind and solar as it will facilitate the transfer of geographically diverse renewable resources across the western grid and help ensure the clean energy grid of the future, both Idaho Power's and surrounding states', is robust and reliable.

OAR 860-025-0030(2)(c)(F). *Each parcel of land that the petitioner has either acquired or has determined it should acquire an interest in to construct and operate the transmission line. The parcels of land that the petitioner has determined it should acquire an interest in must be clearly marked and must clearly show the general contour, uses, and improvements along that portion of the proposed route, inclusive of structures and agricultural uses.*

As noted earlier, the Company is currently negotiating with landowners in good faith to obtain options for easements and will continue to negotiate in good faith with landowners to avoid condemnation wherever possible; however, Idaho Power must initiate the CPCN proceeding in order to obtain the CPCN in time for construction of the B2H project to commence in 2023. If the Company waits until the outstanding permits and approvals are issued to initiate this proceeding, Idaho Power likely will not be able to meet the B2H project's 2026 in-service date. See Attachment 10 for maps, by county, of parcels on which the Company has acquired, or has determined it may need to acquire, an easement. Pages 1 through 7, include the names and addresses of all persons who

[30] Idaho Power/100, Ellsworth/34-35.

have known interests in the land that may be physically impacted or traversed. It also includes a column identifying whether or not the Company has obtained rights-of-way associated with the property as well as an identification number that corresponds with the maps of the properties.

C. OAR 860-025-0030(2)(d): Cost information.

An estimate of both already incurred and forecasted costs of developing the transmission line project, including:

OAR 860-025-0030(2)(d)(A). *Parcels of land that petitioner determines it should obtain an interest in and for which condemnation is assumed to be necessary at the time of the petition.*

Idaho Power is currently negotiating, and will continue to negotiate, with landowners in good faith to obtain options for easements and avoid condemnation wherever possible. However, Idaho Power anticipates it may need to initiate condemnation proceedings to gain access to certain parcels along the B2H project and must initiate the CPCN proceeding in order to obtain the CPCN in time for construction to commence in 2023.

Using the list of parcels in Attachment 10, and removing the value of easements on parcels for which the Company already has an easement right, or a signed option agreement, Idaho Power has estimated the Company's share of the cost of the easements for which condemnation may be required. The estimate is based on the current market value of the remaining easement areas to be acquired, or approximately $[redacted], which would be the estimated cost of the land easements if all of those remaining easements were to be condemned.

OAR 860-025-0030(2)(d)(B). *Other parcels of land and interests therein acquired or to be acquired.*

The total cost to Idaho Power for the B2H project easements and other interests it has already obtained is approximately $[redacted] for total estimated right-of-way costs for the B2H project on a system basis of approximately $[redacted].

OAR 860-025-0030(2)(d)(C). *Transmission facilities, including but not limited to, poles, lines, substations, accessory and miscellaneous labor, plant and equipment inclusive of any communication apparatus and environmental mitigations.*

Based on the Company's most recent forecast, the estimated cost of Idaho Power's share of all other B2H project direct costs, excluding right-of-way, indirect and overhead costs, on a system basis is approximately $[redacted].[31]

OAR 860-025-0030(2)(d)(D). *Indirect and overhead costs including engineering, legal expense, taxes, interest during construction, and itemized administrative and general expenses.*

The Company estimates Idaho Power's share of overheads, Allowance for Funds Used During Construction, and property taxes associated with the B2H project will be a total of $[redacted] on a system basis.

OAR 860-025-0030(2)(d)(E). *Any other costs, direct or indirect, relating to the transmission line project including but not limited to operating and maintenance costs of the project.*

[31] Excludes capital costs associated with the B2H project transmission upgrades discussed in the Direct Testimony of Mr. Ellsworth, including the Midline Series Capacitor station, local 230-kV upgrades necessary to integrate the project into the Treasure Valley load center, and the buyout of BPA's permitting interest. *See* Idaho Power/100, Ellsworth/30-31.

Idaho Power anticipates the Company's share of operation and maintenance costs associated with the B2H project to be minimal, approximately $300,000 per year on a system basis. At this time, Idaho Power does not anticipate other estimated B2H project costs that have not been reflected in the amounts above.

OAR 860-025-0030(2)(d)(F). *Explanation of the foregoing cost estimates as needed to enable a full understanding of their basis and derivation.*

Based on cost estimates revised in 2022, Idaho Power estimates the Company's share of the overall B2H project costs to be approximately $[redacted] on a system basis, which is made up of costs associated with the transmission facilities including a contingency, overheads, Allowance for Funds Used During Construction (AFUDC) and property taxes. The following table summarizes the cost breakdown:

Direct Costs	[redacted]	
Overheads		
Contingency		
AFUDC		
Property Taxes		
Total		

D. OAR 860-025-0030(2)(e): Financial Feasibility.

An explanation of the financial feasibility of the proposed transmission line, including any expected costs, revenues, and financing tools.

As detailed in the direct testimony of Mr. Ellsworth, the 2021 IRP Preferred Portfolio includes B2H project costs assuming Idaho Power's ownership share under the Term Sheet, or 45.45 percent. The capital costs modeled, including Allowance for Funds Used During Construction, and excluding any contingency amounts to be consistent with

other resources modeled, are $435.5 million.[32] The Preferred Portfolio also includes a reduction in project costs associated with incremental transmission revenues, ultimately benefiting Idaho Power's retail customers. Due to the significant increase in capacity that the B2H project provides to the Idaho to Northwest path, the Company believes firm, short-term firm, and non-firm usage of the Idaho Power transmission system by third parties will likely increase.[33] Additionally, Idaho Power's acquisition of 200 MW of bidirectional capacity to Four Corners, New Mexico will only further enhance the value of the Company transmission system to third parties.[34] These potential revenues would further reduce the cost of the project; however, to be conservative, when modeling in the 2021 IRP, Idaho Power assumed a constant transmission usage by third parties (no increase or decrease) from an average of usage over recent years.[35]

In addition, as evidenced by an opinion from the Company's legal counsel provided as required in the EFSC application and included as Attachment 11, Idaho Power has the legal authority to construct and operate the B2H project without violating its bond indenture provisions, as supplemented, articles of incorporation, bylaws (which together with the articles of incorporation contain all applicable covenants pertaining to common stock), credit agreement, or similar agreements. Due to the high demand for transmission services, the high cost of building new transmission lines, and the intrinsic value of transmission rights-of-way, the Company designs, constructs, and operates its transmission lines and stations with the objective that the facility will be in service indefinitely. Idaho Power has never retired any high-voltage transmission line facilities.

[32] Idaho Power/100, Ellsworth/29.
[33] Idaho Power/100, Ellsworth/31.
[34] *Id.*
[35] *Id.* at 31-32.

Industry-wide, transmission line retirements are extremely rare, occurring only when a line is re-routed. In the extremely unlikely event the B2H project would need to be retired, the Company has the financial capability to cover the costs of the same, as evidenced by the letter from Wells Fargo Bank also provided in support of the EFSC application and included as Attachment 12.

E. OAR 860-025-0030(2)(f): Description of Parcels Necessary for Construction.

A description of the parcels of land that petitioner determines it should obtain an interest in and for which condemnation is assumed to be necessary at the time of the petition, a full explanation of the intended use and the specific necessity and convenience of each. The description must be accompanied by the names and addresses of all persons who have interests, known or of record, in the land to be physically impacted or traversed by the proposed route from whom petitioner has not yet acquired the interest, rights of way or option therefor. Petitioner must include with the petition certification verifying that notice of the petition has been mailed to said persons.

See Attachment 10 for maps of the parcels of land for which Idaho Power has determined it has acquired, or will need to acquire, for the B2H project. Pages 1 through 7, include the names and addresses of all persons who have known interests in the land that may be physically impacted or traversed and from whom Idaho Power has not yet acquired an easement or option. The maps identify those parcels for which the Company has not obtained rights-of-way and therefore may need to be condemned. The maps consist of satellite images along the route and to show the necessity and convenience for each parcel, include the proposed route, proposed tower locations, stations, parcel

identifications, and whether or not the property is zoned farm or forest and non-farm or forest. Included as part of this request, is a Certificate of Service listing all the potential affected landowners, identified in Attachment 10, as recipients of the notice of the Petition.

F. OAR 860-025-0030(2)(g): Information related to alternate routes. A statement and explanation with supporting data comparable to that described in subsections (d) and (e) of this section for possible alternative routes analyzed by petitioner.

Over the past decade, Idaho Power has evaluated a myriad of routes. It is important to note that, as a practical matter, providing a comparable level of cost data for all possible alternative routes that were studied for the B2H project is not possible because some alternative routes or route segments were rejected and not studied at the same level of detail (including detailed design and cost estimating) in comparison with the proposed transmission line route. Additionally, cost is not the only criterion used for evaluating a route, and instead other factors may drive siting, such as: (1) regulatory criteria from the BLM, Forest Service, ODOE, Oregon Department of Fish and Wildlife, and Idaho Department of Fish and Game, (2) results of the technical analysis of proposed route alternatives, (3) community criteria, (4) difficulty of construction, and (5) placement opportunities and avoidance and exclusion categories. In general, the route choice was dictated by siting constraints and opportunities and therefore routes rejected early in the process were rejected for non-cost related reasons. However, cost was considered where there was a choice between two permittable routes; in such a case, all other things being equal, the preferred route would have been the shorter, more easily constructed – and therefore less costly – route.

As evidenced in its ASC, Idaho Power presented EFSC with four alternative route segments that could each replace a portion of the proposed B2H project route. Those were: (1) West of Bombing Range Road Alternative 1 (3.7 miles) ("Alternative 1"), (2) West of Bombing Range Road Alternative 2 (3.7 miles) ("Alternative 2"), (3) Morgan Lake Alternative (18.5 miles) ("Alternative 3"), and (4) Double Mountain Alternative (7.4 miles) ("Alternative 4"). The alternative routes are shown in Attachment 7.

As indicated in the ASC, the primary difference between Alternative 1 and the related proposed route segment is that the alternative route shifts a portion of the B2H project from Navy land on the west side of the road to private land on the east side of the road. This alternative will result in impacts to agricultural operations on the east side of the Boardman Bombing Range that otherwise would be avoided with the proposed route. Alternative 2 was developed to avoid the agricultural impacts associated with Alternative 1 on the east side of the Boardman Bombing Range, while also avoiding the Boardman Research Natural Area.

In comparison with the related proposed route segment, Alternative 3 crosses fewer parcels with residences, does not cross the Ladd Marsh WMA, does not cross highway I-84, and is 0.5 mile shorter. Alternative 3 was developed by the Company based on input from land owners.

Finally, Alternative 4, which is located entirely on BLM-managed land, is rangeland and sagebrush. Almost the entire length of this alternative route is located within the BLM-designated Double Mountain Wilderness Characteristic Unit. As can be seen by alternative routes presented in the ASC, cost is not the only criterion used for evaluating a route, and other factors such as permitting difficulty in connection with land

use, fish and wildlife, historic and archaeological resources, or other resource constraints ultimately drive route selection.

G. OAR 860-025-0030(2)(h): Additional information. Such additional information as may be needed for a full understanding of the petition.

In addition to the information provided in this Petition, the direct testimony of Mr. Ellsworth, Transmission, Distribution & Resource Planning Director, presents the need and justification for the B2H project, identifying Idaho Power's 2026 capacity deficit through development of the IRP which has been repeatedly met with the addition of a planned 500-kV transmission project, and how the B2H project has demonstrated to be the most cost-effective method for serving projected customer demand.[36] The direct testimony of Ms. Barretto, 500-kV and Joint Projects Senior Manager will present the practicability, design, and permitting of the B2H project.[37] In addition to being the lowest-cost resource in the 2021 IRP, the project is the most cost-effective and reliable way to make progress in meeting the Company's 2045 clean energy goal. The B2H project is needed to continue to provide safe, reliable electric service to Idaho Power's customers and should be deemed by the Commission to be necessary and convenient.

H. OAR 860-025-0030(2)(i): Safety standards information. *A summary of petitioner's plan to ensure compliance with applicable Commission rules, including but not limited to OAR Chapter 860, Division 24, and other safety standards for the safe construction, operation and maintenance of the transmission line. Petitioner must include a certificate executed by an authorized representative of petitioner affirming that it will*

[36] *See* Idaho Power/100, Ellsworth.
[37] *See* Idaho Power/200, Barretto.

adhere to the applicable Commission rules and other applicable safety standards for construction operation and maintenance of the transmission line. The representative's certificate must be a sworn statement under ORS 162.055 attesting to the truth of the certification;

As described in the testimony of Company witness Ms. Barretto, and evidenced by the declaration included as Idaho Power/202, the B2H project will satisfy the Commission's safety criterion, because it will be constructed, operated, and maintained to meet or exceed all applicable National Electrical Safety Code standards, as well as all applicable federal state and local laws, regulations, and ordinances.[38] Further, Idaho Power has substantial experience in constructing, operating, and maintaining transmission lines in a safe, efficient manner.

Further, with respect to rights-of-way, the widths are based on the National Electrical Safety Code that requires: (1) sufficient clearance is maintained to the edge of the right-of-way during a wind event when the conductors are blown towards the right-of-way edge, (2) sufficient room to allow for transmission line maintenance, and (3) sufficient clearances where structures or trees may be located and deemed a hazard or danger to the transmission line. As a result, there may be circumstances in which specific localized conditions may result in slightly different right-of-way widths. These will be finalized during the detailed design.

Finally, as part of the B2H site certificate, Idaho Power has various plans and commitments to reduce and mitigate the risk of a transmission-related fire during both

[38] *See* Idaho Power/200, Barretto/3-5.

construction and operation of the B2H project.[39] Specifically, the B2H site certificate requires Idaho Power to implement its Fire Prevention and Suppression Plan,[40] which details specific fire-prevention actions during construction, including: posting a firewatch, stationing a water truck at the job site, enforcing red flag warnings, providing fire behavior training to all construction personnel, keeping vehicles on or within designated roads or work areas, and providing fire suppression equipment and emergency notification numbers at each construction site.[41] Additionally, in the event that a fire occurs, firewatch personnel will first report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities and agree on a checking system.[42] Then, after determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, firewatch personnel will immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.[43]

During operation, Idaho Power's fire-prevention actions will be governed by Vegetation Management Plan and the Wildfire Mitigation Plan.[44] Idaho Power will

[39] Idaho Power/200, Barretto/7-8.

[40] *In re Application for Site Certificate for the Boardman to Hemingway Transmission Line*, Energy Facility Siting Council, Draft Final Order, Attachment 1: Draft Site Certificate Conditions at 36-37 (Sept. 16, 2022) (discussing Public Services Condition 6, which requires Idaho Power to follow its Fire Prevention and Suppression Plan during construction and operation of the transmission line) (available at https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2022-09-16-Attachment-1-Draft-Site-Certificate-Conditions.pdf) (last visited Sept. 29, 2022) [hereinafter "Draft Site Certificate Conditions"]. The EFSC has approved Idaho Power's site certificate, but has not yet issued its final order memorializing that approval. For that reason, the document cited here is the draft site certificate. Idaho Power will provide a copy of the final site certificate after EFSC issues its final order..

[41] *In re Application for Site Certificate for the Boardman to Hemingway Transmission Line*, Energy Facility Siting Council, Draft Final Order, Attachment U-3, Fire Prevention and Suppression Plan, § 2.1 [hereinafter "Fire Prevention and Suppression Plan"] (available at https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2022-09-16-Attachment-U-3-Draft-Fire-Prevention-Suppression-Plan.pdf) (last visited Sept. 29, 2022).

[42] *Id.* at § 2.1.5.

[43] *Id.*

[44] *In re Idaho Power Wildfire Protection Plan*, Docket UM 2209, Idaho Power's 2022 Supplemental Wildfire Mitigation Plan (June 28, 2022) (available at https://edocs.puc.state.or.us/efdocs/HAD/um2209had14368.pdf) (last visited Sept. 29, 2022) [hereinafter "2022 Supplemental Wildfire Mitigation Plan"].

minimize the likelihood of vegetative contact with the transmission line by clearing the right-of-way of any vegetation and regularly conducting vegetation management along the Project route. Idaho Power will initially remove trees and tall shrubs that could potentially come into contact with conductors as part of the right-of-way clearing.[45] After the initial clearance, Idaho Power will maintain the right-of-way consistent with the Project-specific Vegetation Management Plan, which requires Idaho Power to perform vegetation management work in accordance with annual work plans that detail segments of the Project to be managed during a calendar year.[46] In accordance with those annual work plans, Idaho Power will trim trees and tall shrubs sufficiently to ensure that the vegetation will not become a clearance violation before the next maintenance cycle.[47]

Idaho Power's Wildfire Mitigation Plan contains provisions that will further reduce the risk of fire from the transmission line, which identified no areas of higher wildfire risk associated with the proposed route. Relevant sections of the Wildfire Mitigation Plan include but are not limited to: Mitigation of fire risk in the Company's operations and transmission programs,[48] enhanced vegetation management;[49] and the temporary operating procedures put in place during fire season.[50]

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[45] *In re Application for Site Certificate for the Boardman to Hemingway Transmission Line*, Energy Facility Siting Council, Draft Final Order, Attachment K-2: Right-of-Way Clearing Assessment at 13 (July 2020) (available at https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2022-09-16-Attachment-K-2-Right-of-Way-Clearing-Assessment.pdf) (last visited Sept. 29, 2022). *See also also* Draft Site Certificate Conditions at 18 (discussing Land Use Condition 16, which requires Idaho Power to comply with the Right-of-Way Clearing Assessment).

[46] *In re Application for Site Certificate for the Boardman to Hemingway Transmission Line*, Energy Facility Siting Council, Draft Final Order, Attachment P1-4: Vegetation Management Plan, Appendix A at 91 (available at https://www.oregon.gov/energy/facilities-safety/facilities/Facilities%20library/2022-09-16-Attachment-P1-4-Draft-Vegetation-Management-Plan.pdf) (last visited Sept. 27, 2022). *See also* Draft Site Certificate Conditions at 24 (discussing Fish and Wildlife Condition 2, which requires Idaho Power to comply with its Vegetation Management Plan).

[47] *Id.* at 3-5.

[48] 2022 Supplemental Wildfire Mitigation Plan at 26.

[49] *Id.* at 29.

[50] *Id.* at 39.

Finally, as part of the Wildfire Mitigation Plan, Idaho Power also promulgated its Public Safety Power Shutoff ("PSPS") Plan.[51] The PSPS Plan details Idaho Power's process for assessing when it may be necessary to de-energize the Company's transmission and distribution facilities, including the Project.[52] Importantly, the Commission has approved Idaho Power's Wildfire Mitigation Plan, including the PSPS Plan.[53]

I. OAR 860-025-0030(2)(j): Estimated revenue requirement impacts.

At a minimum, petitioner must include an estimate of the levelized, annual revenue requirement of the transmission line as a percentage of its estimated annual revenue requirement. A revenue requirement estimate provided under this rule may be used solely for purposes of evaluating the petition.

Assuming the Company's share of the overall B2H project costs of $[redacted], which is made up of costs associated with the transmission facilities including a contingency, overheads, Allowance for Funds Used During Construction (AFUDC) and property taxes, the estimated levelized annual revenue requirement would be approximately [redacted].

[51] *In re Idaho Power Wildfire Protection Plan*, Docket UM 2209, Idaho Power's 2022 Supplemental Wildfire Mitigation Plan, Appendix B: Idaho Power Company's Wildfire Public Safety Power Shutoff Plan (Dec. 2021) [hereinafter "PSPS Plan"].

[52] *Id.* at 5-9.

[53] *In re Idaho Power Wildfire Protection Plan*, Docket UM 2209, Order No. 22-312 (Aug. 26, 2022).

[54] Includes the revenue requirement associated with the capital costs related to the B2H project transmission upgrades, as described in the direct testimony of Mr. Ellsworth.

J. OAR 860-025-0030(2)(k): Public benefits and cost information.

Public benefits and costs of the transmission line, if any, are reasonably known to petitioner, including but not limited to: (A) costs and benefits to petitioner's Oregon customers and customers of other Oregon utilities and to Oregonians in general, (B) costs and benefits that the proposed transmission line will provide related to connection to regional and inter-regional grids.

As explained in Company witness Mr. Ellsworth's testimony, the 2021 IRP Preferred Portfolio that includes the B2H project, is, on a net present value basis, $266 million more cost effective than the lowest cost non-B2H project portfolio, definitively showing that the B2H project is a necessary component of the Company's Preferred Portfolio and minimizes both cost and risk to Idaho Power's customers.[55] These results are based on B2H project costs assuming Idaho Power's ownership share under the Term Sheet, or 45.45 percent, totaling $435.5 million.[56] The B2H project is modeled in AURORA as additional transmission capacity available for Idaho Power energy purchases from the Pacific Northwest. In general, for new supply-side resources modeled in the IRP process, surplus sales of generation are included as a cost offset in the AURORA portfolio modeling. Transmission wheeling revenues, however, are not included in AURORA calculations.

To account for this, in the 2021 IRP, Idaho Power modeled incremental transmission wheeling revenue from non-native load customers as an annual revenue

[55] Idaho Power/100, Ellsworth/27.
[56] Idaho Power/100, Ellsworth/29.

credit, offsetting retail revenue requirements of the Company's customers.[57] Therefore, the Preferred Portfolio, which includes the B2H project, includes a reduction in project costs associated with all anticipated incremental transmission revenues resulting from the B2H project, ultimately benefiting the Company's retail customers. The transmission revenue credit incorporates any changes in point-to-point reservations with BPA and PacifiCorp as agreed to under the Term Sheet as well. The B2H project will increase Idaho Power's transmission capacity to the Pacific Northwest and enable additional purchased power from the Mid-C hub at both peak times and when energy prices are favorable relative to the costs of the Company's existing resource fleet, leveraging diversity that exists in the region.

In addition, as explained earlier, due to the significant increase in capacity that the B2H project provides to the Idaho to Northwest path, the Company believes firm, short-term firm, and non-firm usage of the Idaho Power transmission system by third parties could increase, as supported by the over 1,000 MWs of transmission requests that the Company has seen across the Idaho to Northwest path over the past 24 months.[58] Finally, Idaho Power's acquisition of 200 MW of bidirectional capacity to Four Corners, New Mexico will only further enhance the value of the Company transmission system to third parties. These potential revenues would further reduce the cost of the project, however, to be conservative, Idaho Power assumed a constant transmission usage by third parties (no increase or decrease) from an average of usage over recent years.

[57] Idaho Power/100, Ellsworth/31.
[58] Idaho Power/100, Ellsworth/31.

It is worth noting that Idaho Power is in frequent contact with load serving entities and others who have an interest in using the B2H project during various times of the year. Idaho Power believes this interest may increase even more as utilities consider day-ahead markets across the West. B2H could potentially provide connectivity to the CAISO and the Southwest Power Pool markets.. The Company will work to ensure customers obtain the value derived from the use of B2H in these markets.

With respect to the costs and benefits to regional and inter-regional grids, the B2H project will increase the robustness and reliability of the regional transmission system by adding additional high-capacity bulk electric facilities designed with the most up-to-date engineering standards.[59] Major 500-kV transmission lines, such as B2H, substantially increase the grid's ability to recover from unexpected disturbances. With a forced outage rate of less than 1 percent, a transmission line is much more reliable than a power plant, providing the Company's operators additional flexibility when managing the Idaho Power resource portfolio. In addition, the B2H project benefits BPA and PacifiCorp, providing BPA a transmission connection to their southern Idaho load with just a single wheel, while strengthening and modernizing PacifiCorp's transmission network and connecting diverse, clean resources across the West. The B2H project was a component of PacifiCorp's 2021 IRP Action Plan as well, approved by the Commission in docket LC 77 with Order No. 22-178.

[59] Idaho Power/100, Ellsworth/36.

K. OAR 860-025-0030(2)(l): Regulatory approval information. A review of and reference to regulatory approvals and reviews that concern, analyze or otherwise discuss the proposed transmission line, such as an integrated resource plan acknowledgement, other short- or long-term planning documents, construction work plans filed with a regulatory body, and any relevant site certificate issued by the EFSC.

The B2H project has been identified as part of the preferred resource portfolio in Idaho Power's 2009, 2011, 2013, 2015, 2017[60], 2019[61] and most recently in the 2021 IRP. In addition, the B2H project has been identified as a regionally significant project, producing a more efficient or cost-effective plan in the Northern Tier Transmission Group's (NTTG) 2007, 2009, 2011, 2013, 2015, 2017, and 2019 biennial regional transmission plans, and in the NorthernGrid, NTTG's successor regional planning organization, 2021 biennial regional transmission plan.[62] With respect to local transmission plans, the B2H project has been a component of Idaho Power's Local Transmission Plan since the 2008-2009 study cycle. Finally, as discussed in the direct testimony of Ms. Barretto and in the Land Use Information section of this Petition, the EFSC made its final decision to issue the site certificate for the B2H project on September 27, 2022.

[60] The B2H project first appeared in the near-term Action Plan of the 2017 IRP which was acknowledged in docket LC 68, Order No. 18-176.

[61] The 2019 IRP was acknowledged in docket LC 74, Order No. 21-184, which included construction of the B2H project to occur in the near-term Action Plan.

[62] Exhibit 203/Idaho Power, Barretto/479-899 (the NTTG and NorthernGrid biennial regional transmission plans were provided as attachments to the Company's Response to SDR No. 5).

L. OAR 860-025-0030(2)(m): Load forecast. The most recent load forecasts available to petitioner supporting need for the line. The load forecasts shall, when feasible, include a load forecast of at least 10 years, and an accompanying narrative explaining the kind, nature, extent, and estimated growth of the energy requirements or reasonably anticipated need, load or demand, as relevant to the proposed transmission line.

As part of the 2021 IRP, Idaho Power prepared Appendix A – Sales and Load Forecast, included as Attachment 13, detailing the energy sales and load forecast of future demand for electricity within the Company's service area, covering a 20-year period from 2021 through 2040, which was the basis for the Preferred Portfolio and resulting need for the B2H project as a resource. The forecast is based on economic data, primarily sourced from Moody's Analytics and Woods & Poole Economics while demographic projects are developed from national and local census data. Since filing the 2021 IRP, the Company's capacity deficit increased more, primarily due to continued high load growth across its service territory, including major new large loads, further supporting the need for the B2H project.

Idaho Power's system load is forecast to increase to 2,482 average megawatts (aMW) by 2040 from 1,895 aMW in 2021, representing an average yearly growth rate of 1.4 percent over the 20-year planning period (2021–2040). From an annual peak-hour demand perspective, the anticipated case of the peak demand forecast will grow to 4,700 MW in 2040 from the all-time system peak of 3,751 MW that occurred on Wednesday, June 30, 2021, at 5 p.m. Over this same term, the number of Idaho Power active retail

customers is expected to increase from the December 2020 level of 586,071 customers to nearly 851,849 customers by year-end 2040. And some of these customers are bringing significant industrial loads to bear.

The economic and demographic variables driving the 2021 forecast have the impact of increasing current annual sales levels throughout the planning period. For the Company, residential sales increased approximately 5 percent in 2020 and into 2021. This growth is attributable to both work-from-home mandates as well as continued strong in-migration trends. Negative energy use was initially exhibited by the commercial and industrial classes but have since stabilized and, overall, rebounded quickly. Irrigation sales were mostly unaffected by the pandemic.

M. OAR 860-025-0030(2)(n): Transmission line alternatives information.

An evaluation of available alternatives to construction of the transmission line, including but not limited to conservation measures, non-wires alternatives, and construction of one or more lower-voltage single or multi-circuit lines. The petitioner may make reference to relevant sections of its most recent integrated resource plan (IRP) filed under OAR 860-027-0400, local transmission plans, or a planning document substantially equivalent to an IRP.

The goal of the IRP is to ensure Idaho Power's system has sufficient resources to reliably serve customer demand and flexible capacity needs over a 20-year planning period while also the selecting a resource portfolio that balances cost, risk, and environmental concerns.[63] When developing the resource portfolios, the Company uses

[63] Idaho Power/100, Ellsworth/13.

AURORA's long-term capacity expansion modeling capability to optimize resource additions and exits of generating units based on the performance of each zone defined within WECC and develops resource portfolios under various future conditions, such as sensitivities for natural gas prices, carbon costs, load growth and electrification, transmission and clean energy constraints and timelines.[64]

By default, the IRP process evaluates available alternatives to construction of the B2H project. The direct testimony of Mr. Ellsworth discusses the 2021 IRP portfolio modeling and Chapter 9 of the 2021 IRP, included as Attachment 14, further details the development of these portfolios, which built portfolios that selected from a broad range of resource types, as well as varied amounts of nameplate generation additions:

- Wind (between 0 and 2,300 MW)
    - Wyoming (between 0 and 800 MW)
    - Idaho (between 0 and 1,500 MW)
- Solar (between 785 and 5,285 MW in total)
    - Standalone (between 785 and 2,285 MW)
    - With Battery Storage (between 0 and 3,000 MW)
- Standalone Storage (between 0 and 2,700 MW in total)
    - Pumped Hydro (between 0 and 500 MW)
    - Compressed Air Energy Storage (between 0 and 600 MW)
    - Battery Energy Storage
        - 4 Hour Transmission Connected (between 0 and 1,000 MW)
        - 4 Hour Distribution Connected (between 0 and 100 MW)

[64] *Id.* at 24.

        - 8 Hour Transmission Connected (between 0 and 500 MW)

- Natural Gas (between 0 and 2,500 MW in total)
    - Reciprocating Engines (between 0 and 333 MW)
    - Combined Cycle Combustion Turbine (between 0 and 600 MW)
    - Simple Cycle Combustion Turbine (between 0 and 850 MW)
        - Aeroderivative (between 0 and 270 MW)
        - Danskin Unit 1 retrofit (0 or 90 MW)
    - Coal to Natural Gas Conversion of Jim Bridger units 1 and 2 (between 0 and 357 MW)
- Nuclear Small Modular Reactor (between 0 and 924 MW)
- Biomass (between 0 and 350 MW)
- Geothermal (between 0 and 300 MW)
- Demand Response (between 0 and additional 280 MW)
- Accelerated Coal Exits (up to 841 MW in total)
    - Jim Bridger (up to 707 MW)
    - North Valmy Unit 2 (134 MW)

Each resulting portfolio consists of a combination of resources to enable Idaho Power to supply cost-effective electricity to customers over the 20-year planning period. The Preferred Portfolio that includes the B2H project is the lowest cost portfolio and best minimizes both cost and risk.

N. OAR 860-025-0030(2)(o): Electrical engineering studies.

All electrical engineering studies and reliability or resiliency analyses, whether performed by the petitioner or other entities, supporting the necessity of the transmission line when relevant, including those addressing single and multiple contingencies.

Through the Western Electricity Coordinating Council (WECC) Path Rating Process, Idaho Power worked with other western utilities to determine the maximum rating (power flow limit) across the transmission line under various stresses, such as high winter or high summer peak load, light load, high wind generation, and high hydro generation on the bulk power system.[65] Based on industry standards to test reliability and resilience, Idaho Power simulated various outages, including the outage of B2H, while modeling these various stresses to ensure the power grid was capable of reliably operating with increased power flow. Through this process, the Company also ensured the B2H project did not negatively impact the ratings of other transmission projects in the Western Interconnection. Idaho Power completed the WECC Path Rating Process achieving a WECC Accepted Rating of 1,050 MW in the west-to-east direction and 1,000 MW in the east-to-west direction. It was determined that the B2H project would add significant reliability, resilience, and flexibility to the Northwest power grid. Attachment 15 is the Project Review Group Phase II Rating Report resulting from this study.

In addition, as mentioned earlier, the B2H project has been identified as a regionally significant project, producing a more efficient or cost-effective plan in the NTTG's 2007, 2009, 2011, 2013, 2015, 2017 and 2019 biennial regional transmission plans, and in the NorthernGrid, 2021 biennial regional transmission plan. Please see

[65] Idaho Power/100, Ellsworth/23.

Attachments 1 through 8 to the Response to Idaho Power Company's Standard Data Request No. 5 for each of the regional transmission plans.

Finally, the Company provides extensive discussion of other reliability benefits of the project in its 2021 IRP Appendix D[66] as well as in the direct testimony of Mr. Ellsworth, which is summarized below:

Resource Adequacy. The primary reliability benefit that the Company has evaluated is the resource adequacy attributes provided by the B2H project. As discussed earlier, Idaho Power operates a system with an early summer peak demand which typically occurs in the late June/early July timeframe primarily due to its irrigation load which aligns well with spring hydro runoff conditions when the Pacific Northwest is generally flush with surplus power capacity. However, the existing transmission system between the Pacific Northwest and Idaho Power is constrained. Constructing the B2H project will alleviate this constraint benefitting the regions by leveraging the diversity of their respective seasonal demand and generation profiles. The Company needs resources to serve peak load and would benefit from buying energy from the Pacific Northwest.

Reliability – Regional Diversity. Utilities interconnect their systems with low-cost transmission creating diversity of load to reduce their need to build power plants. Transmission allows them to build and share larger, more cost-effective, and more efficient power plants. The B2H project is being developed to take advantage of existing diversity, benefiting both Idaho Power's transmission and retail customers. As evidenced

[66] See Appendix D to Idaho Power's 2021 IRP, pages 41-43, included as an attachment to Idaho Power's Response to Standard Data Request No. 11.

by peak-load estimates, there is significant diversity among the utilities between the western and eastern side of the entire Northwest. If each utility were to individually plan and construct generation to meet their own peak load, 71,900 MW of generating capacity would be required. However, by planning together, that total generating capacity can be reduced more than 10 percent, to 63,500 MW. Transmission connections between the regions, such as B2H, are the key to sharing installed generation capacity.

Grid Reliability/Resiliency. The B2H project will increase the robustness and reliability of Idaho Power's regional transmission system by adding additional high-capacity bulk electric facilities designed with the most up-to-date engineering standards, benefitting the Company's transmission and retail customers as well as substantially increasing the grid's ability to recover from unexpected disturbances.

Resource Reliability. Availability and contribution to resource adequacy on the power grid vary significantly by resource type, but the forced outage rate of a transmission lines has historically been lower than traditional generation resources. With a forced outage rate of less than 1 percent, a transmission line is significantly more reliable than a power plant. Of course, a transmission line requires generating resources to provide energy to the line to serve load. However, energy sold as "Firm" must be backed up and delivered even if a source generator fails. Therefore, Firm energy purchases would have a forced outage rate consistent with the transmission line, which is more reliable than traditional supply-side generation. In the management of cost and risk, the B2H project will provide Idaho Power's operators additional flexibility when managing the Idaho Power's increasingly clean resource portfolio.

O. OAR 860-025-0030(2)(p): Land use information.

A narrative that identifies all land use approvals and permits required for construction of the transmission line. This narrative must include information on whether petitioner has submitted an application for each approval or permit, the status of all such applications, and an explanation as to why petitioner did not obtain any pending or outstanding approvals or permits before submitting a petition under this rule as applicable, including anticipated timelines for issuance of any pending or outstanding approvals and permits, and the section of OAR 860-025-0040 under which the petitioner seeks to demonstrate compliance with that rule.

Under Oregon law, certain types of energy facilities must obtain a site certificate from the Energy Facility Siting Council prior to construction.[67] The term "energy facility" includes a "high voltage transmission line of more than 10 miles in length with a capacity of 230,000 volts or more to be constructed in more than one city or county in this state."[68] Because the B2H project consists of a transmission line of more than 10 miles and with a capacity greater than 230-kV, it is therefore an "energy facility" and cannot be constructed without a site certificate issued by the Council. EFSC determines compliance with all applicable EFSC standards, Oregon and local government statutes, regulations, and permitting requirements related to siting the facility, except for federally-delegated state permits.[69] Upon issuance of the site certificate and following submission by Idaho

[67] See ORS 469.320(1).
[68] ORS 469.300(11)(a)(C).
[69] See ORS 469.401(4) (explaining that matters not included in and governed by the Site Certificate "include but are not limited to employee health and safety, building code compliance, wage and hour or other labor regulations, local government fees and charges or other design or operational issues that do not relate to siting the facility").

Power of the appropriate applications and payment of proper fees, the affected state agencies and local governments will issue the permits addressed in the site certificate.

The federal, state, and local permits needed for construction and operation of the B2H project in Oregon are identified in the chart included as Attachment 16. Additionally, in Idaho, the Company will need a conditional use permit from Owyhee County. Idaho Power obtained the necessary right-of-way authorizations to cross federal lands administered by the United States Bureau of Land Management in 2017, the Forest Service in 2018, and the Department of Navy in 2020.

In 2018, Idaho Power submitted its complete application for an EFSC site certificate to construct the portions of the B2H project located in Oregon. As part of that application, the Company has requested that the site certificate include and govern the local land use approvals related to siting. In July 2020, the Oregon Department of Energy issued its proposed order, proposing approval of the B2H project subject to certain conditions. Certain members of the public objected to aspects of the proposed order, and EFSC initiated a contested case hearing process to consider the issues raised. On September 27, 2022, EFSC made its final decision to issue the site certificate approving the B2H project subject to certain conditions.[70] In accordance with ORS 469.401(3), following issuance of the site certificate, the state and local agencies will issue the permits and land use approvals governed by the site certificate without further hearings or other proceedings. The permits and approvals beyond those discussed above are in various stages of their respective application and approval processes, the status of which is

[70] Idaho Power understands that EFSC will issue the Final Order and Site Certificate on or around September 30, 2022.

presented in the chart below, and Idaho Power expects they will be issued prior to the start of construction in 2023.

As explained earlier, Idaho Power is submitting its Petition prior to obtaining the outstanding permits and approvals due to scheduling constraints. The B2H project is intended, in part, to serve the 2026 resource deficit identified in Idaho Power's 2021 Integrated Resource Plan. In order to complete the B2H project by 2026, construction must begin in summer 2023. And to begin construction in 2023, the Company will need access to the affected parcels. Idaho Power anticipates it will need to initiate condemnation proceedings to gain access to certain parcels along the B2H project but cannot initiate those condemnation proceedings without first obtaining a CPCN. In order to obtain the CPCN in time to gain access and start construction in 2023, Idaho Power must initiate the CPCN proceedings in September 2022. Therefore, if Idaho Power waits until the outstanding permits and approvals are issued to submit the Company's Petition for a CPCN, Idaho Power likely will not be able to meet the B2H project's 2026 in-service date.

P. OAR 860-025-0030(2)(q): Standard data requests.

When filing a petition, a petitioner must also certify that it has concurrently submitted its responses to the most recent version of the Standard Data Requests for Petitions for Certificates of Public Convenience and Necessity, developed by Staff and available on the Commission's website. As noted earlier, as part of the Notice of Intent

submitted to the Commission on September 1, 2022, Idaho Power also filed its responses to the draft Standard Data Requests[71] on the Commission's Huddle site.

V. CONCLUSION

The B2H project has been a cost-effective and reliable resource identified in each of Idaho Power's IRPs since 2009 and continues to be a cornerstone of Idaho Power's 2021 IRP Preferred Portfolio. In the 2021 IRP, as has been the case in prior IRPs, the B2H project is not simply evaluated as a transmission line, but rather as a resource that will be used to serve Idaho Power load, proving to be the most cost-effective method of serving projected customer demand. Once operational, the B2H project will provide Idaho Power increased access to reliable, clean, low-cost market energy purchases from the Pacific Northwest. In addition, the B2H project will increase the efficiency, reliability, and resiliency of the electric system by creating an additional pathway for energy to move between major load centers in the West. The benefits in aggregate reflect the B2H project's importance to the achievement of Idaho Power's goal to provide 100 percent clean energy by 2045 without compromising the Company's commitment to reliability and affordability.

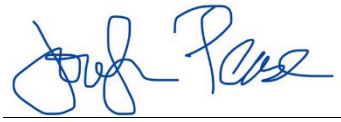
Idaho Power is submitting its Petition prior to obtaining the outstanding permits and approvals due to scheduling constraints. To begin construction in 2023, the Company will need access to the affected parcels. Idaho Power is currently negotiating with landowners in good faith to obtain options for easements, however, Idaho Power anticipates it may need to initiate condemnation proceedings to gain access to certain

[71] Idaho Power's filing included responses to the June 2022 Standard Data Requests; the Company will supplement its filing based on any additional Standard Data Requests that are issued following approval of the rules in AR 626.

parcels along the B2H project. While the Company will continue to negotiate in good faith with landowners to avoid condemnation wherever possible, Idaho Power must initiate the CPCN proceeding now, and respectfully requests approval no later than May 5, 2023, in order to obtain the CPCN in time for construction to commence in 2023.

Respectfully submitted this 30th day of September, 2022.

McDOWELL RACKNER GIBSON PC



Jocelyn Pease

IDAHO POWER COMPANY

Donovan Walker
Lead Counsel
P.O. Box 70
Boise, Idaho 83707

Attorneys for Idaho Power Company

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the confidential pages of Idaho Power Company's Petition for Certificate of Public Convenience and Necessity on the parties to Docket PCN 5 on the date indicated by email addressed to said person(s) at his or her last-known address(es) indicated below.

PCN 5 Service List

STAFF	
Kim Herb (C) Public Utility Commission of Oregon PO BOX 1088 SALEM OR 97308-1088 kim.herb@puc.oregon.gov	Johanna Riemenschneider (C) Oregon Department of Justice BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4796 johanna.riemenschneider@doj.state.or.us

STOP B2H	
Jim Kreider (C) 60366 MARVIN RD LA GRANDE OR 97850 jkreider@campblackdog.org	

DATED: September 30, 2022

/s/ Alisha Till
Alisha Till
Paralegal

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket PCN 5

In the Matter of

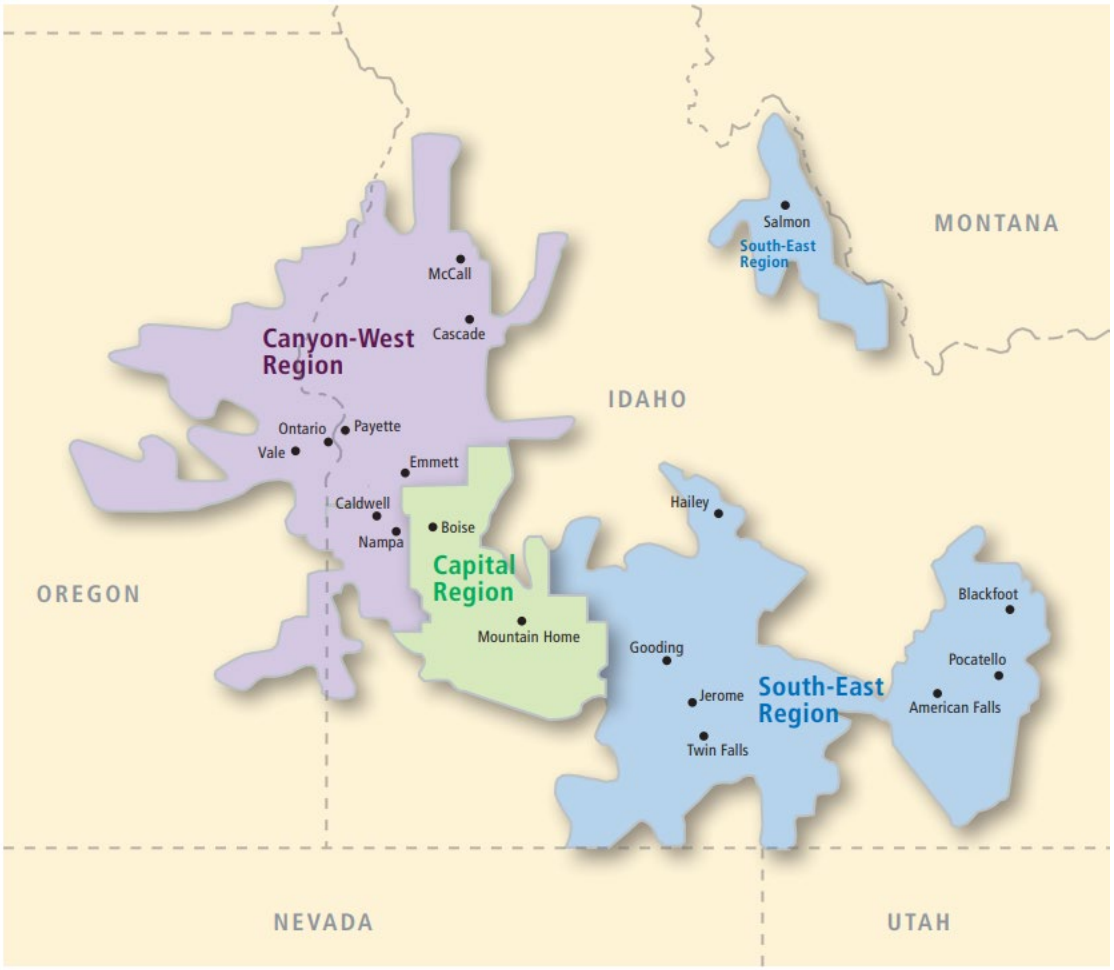
IDAHO POWER COMPANY'S
PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE
AND NECESSITY

Attachment 1

Idaho Power Service Area

September 30, 2022

Idaho Power's Service Area Map



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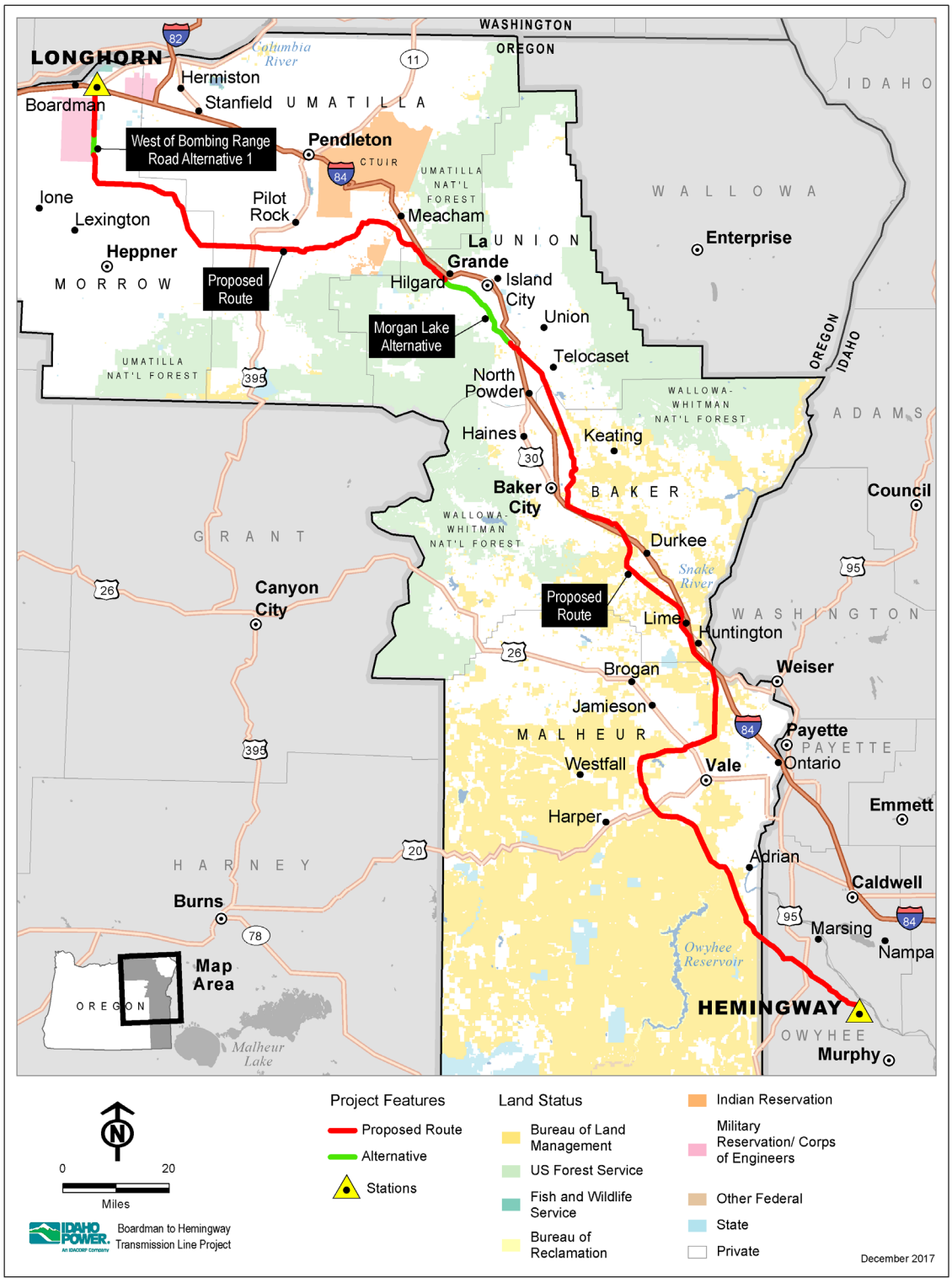
Attachment 2

B2H Project Proposed Route

September 30, 2022

B2H Project Proposed Route



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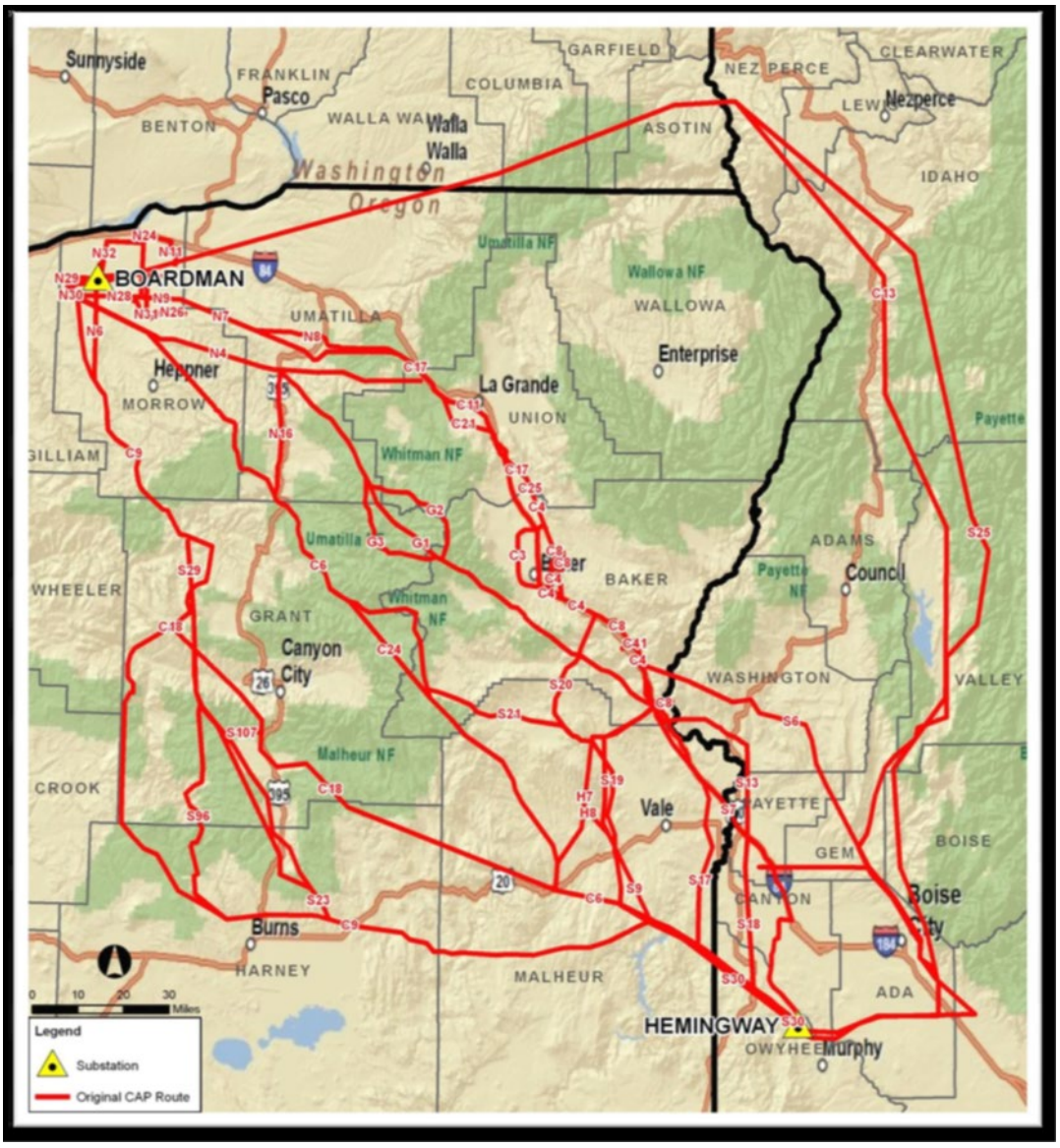
Attachment 3

Routes Developed by CAP Teams

September 30, 2022

B2H Project Routes Developed by the Community Advisory Process Teams 2009 timeframe



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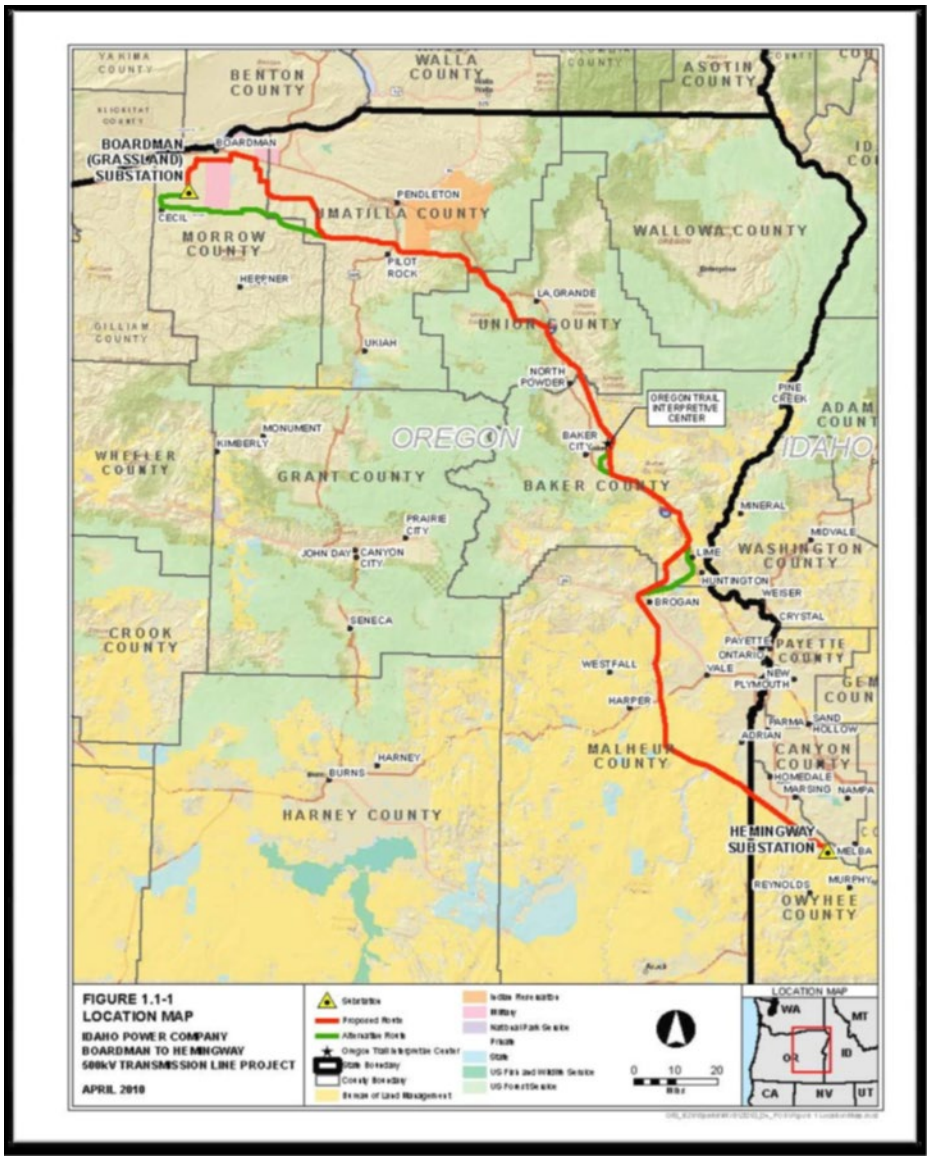
Attachment 4

CAP Proposed Route to BLM

September 30, 2022

B2H Project Proposed Route Resulting from the Community Advisory Process 2010 timeframe



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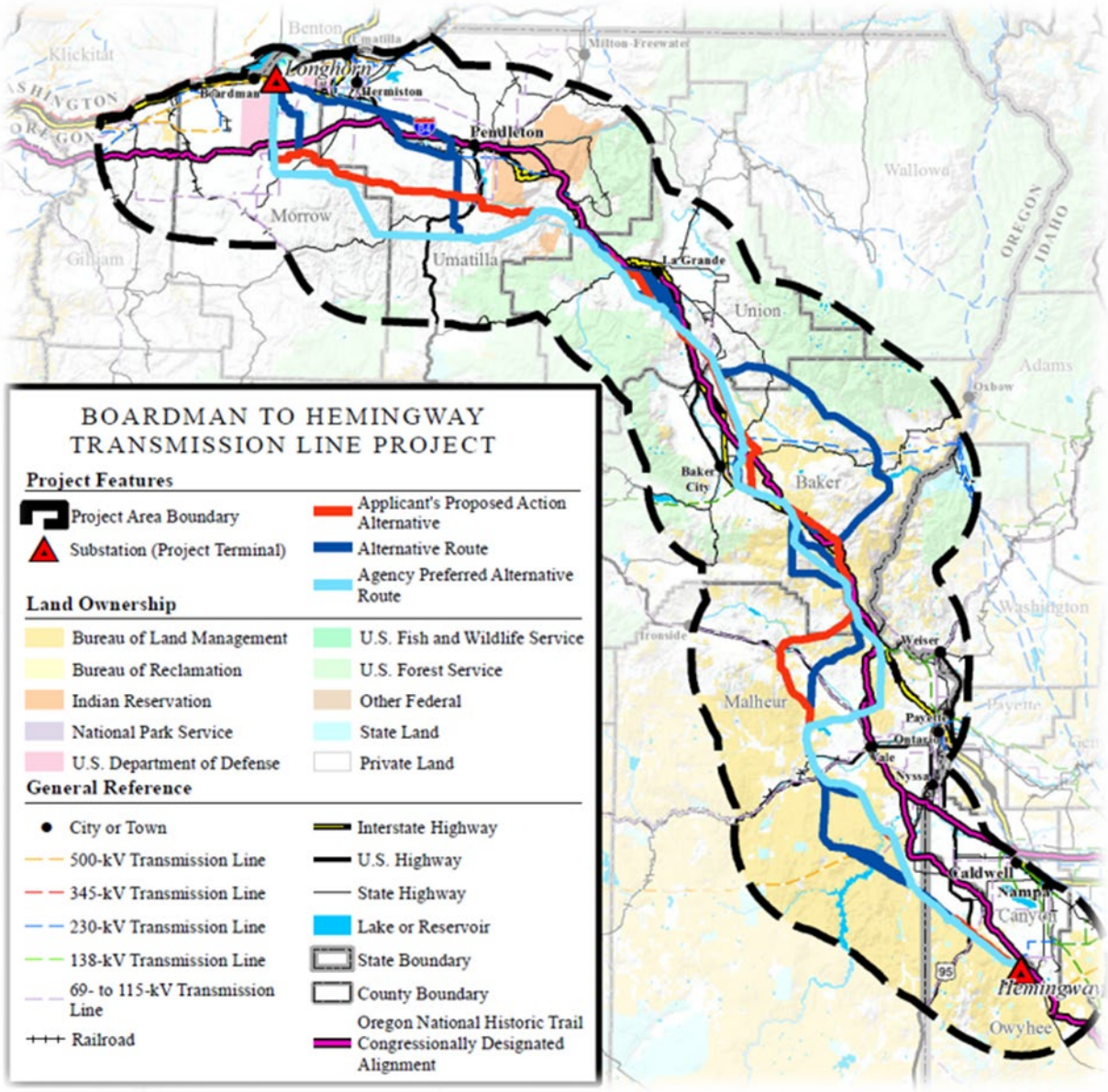
Attachment 5

BLM Route Alternatives

September 30, 2022

Bureau of Land Management Final Environmental Impact Statement Routes



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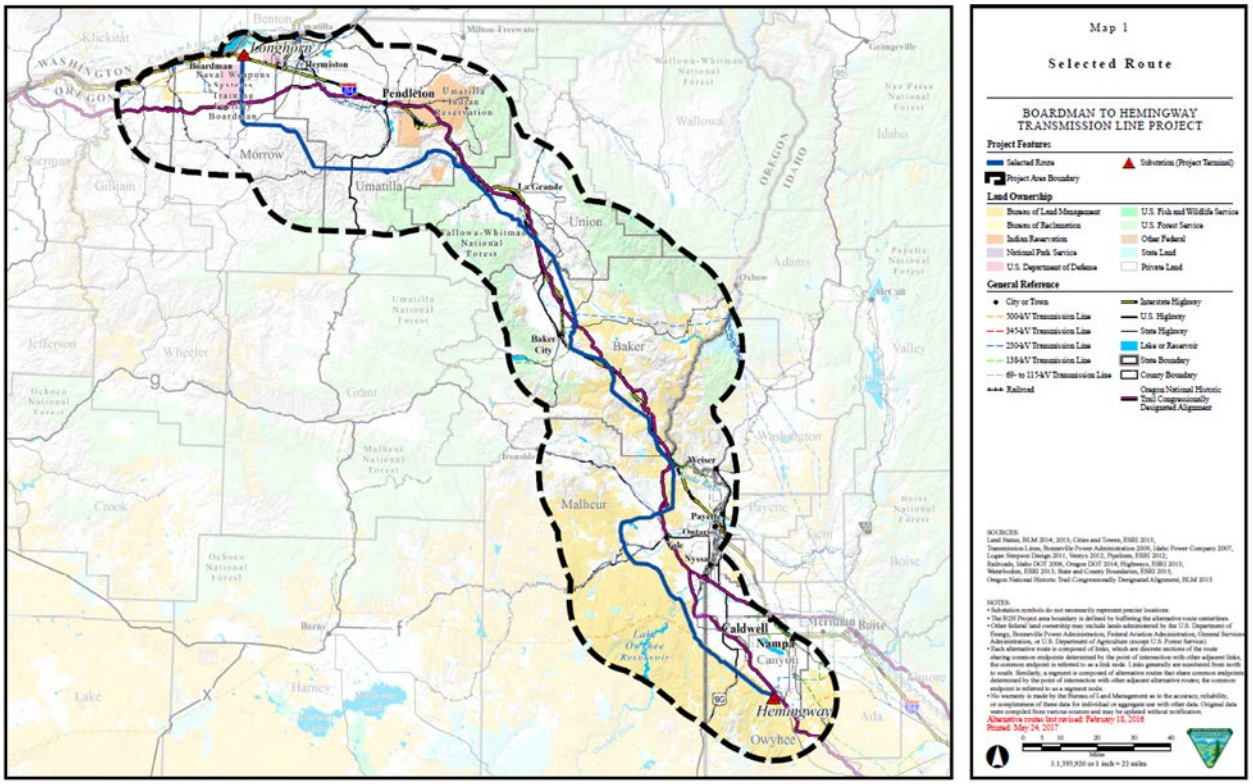
Attachment 6

BLM Agency Preferred Route

September 30, 2022

Bureau of Land Management Agency Preferred Route

2017 Record of Decision



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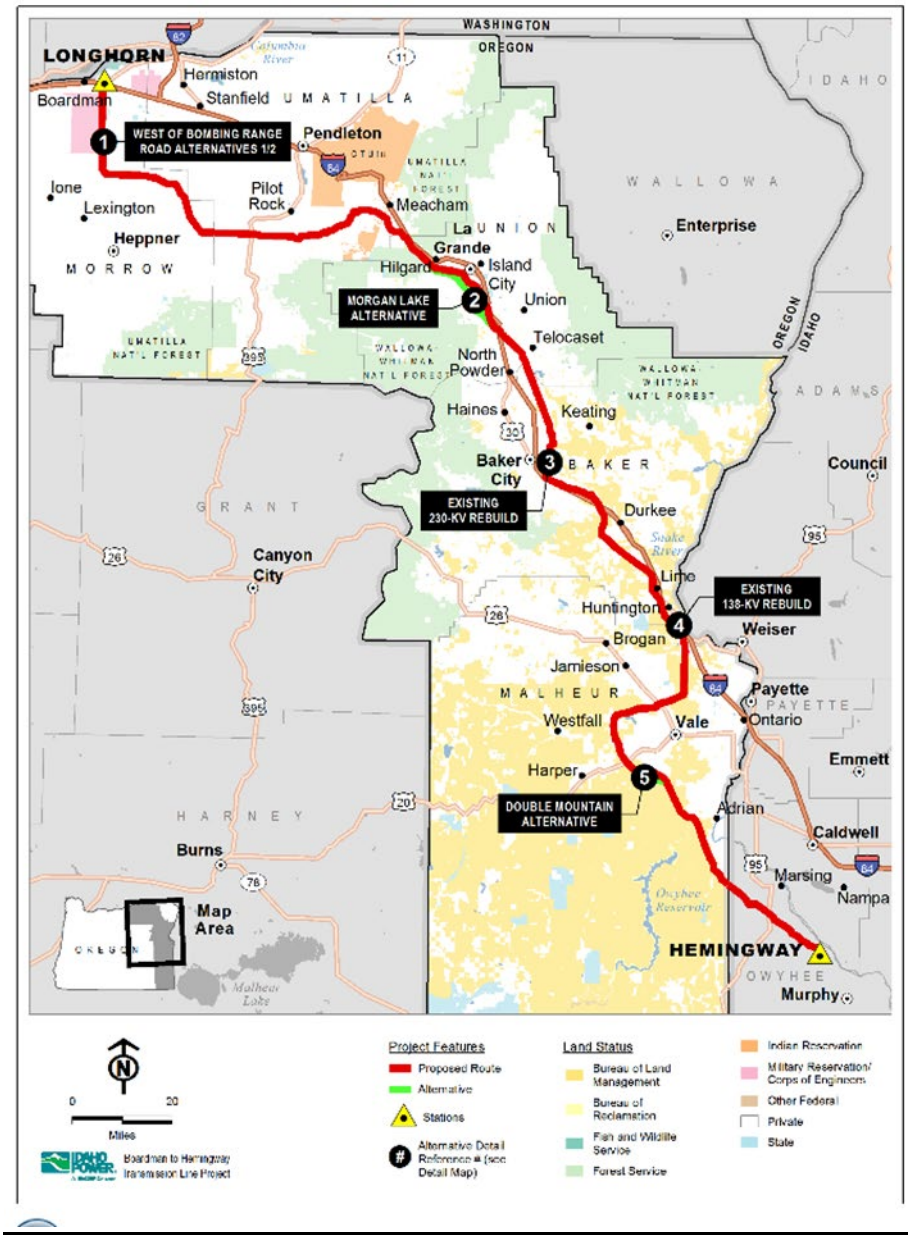
Attachment 7

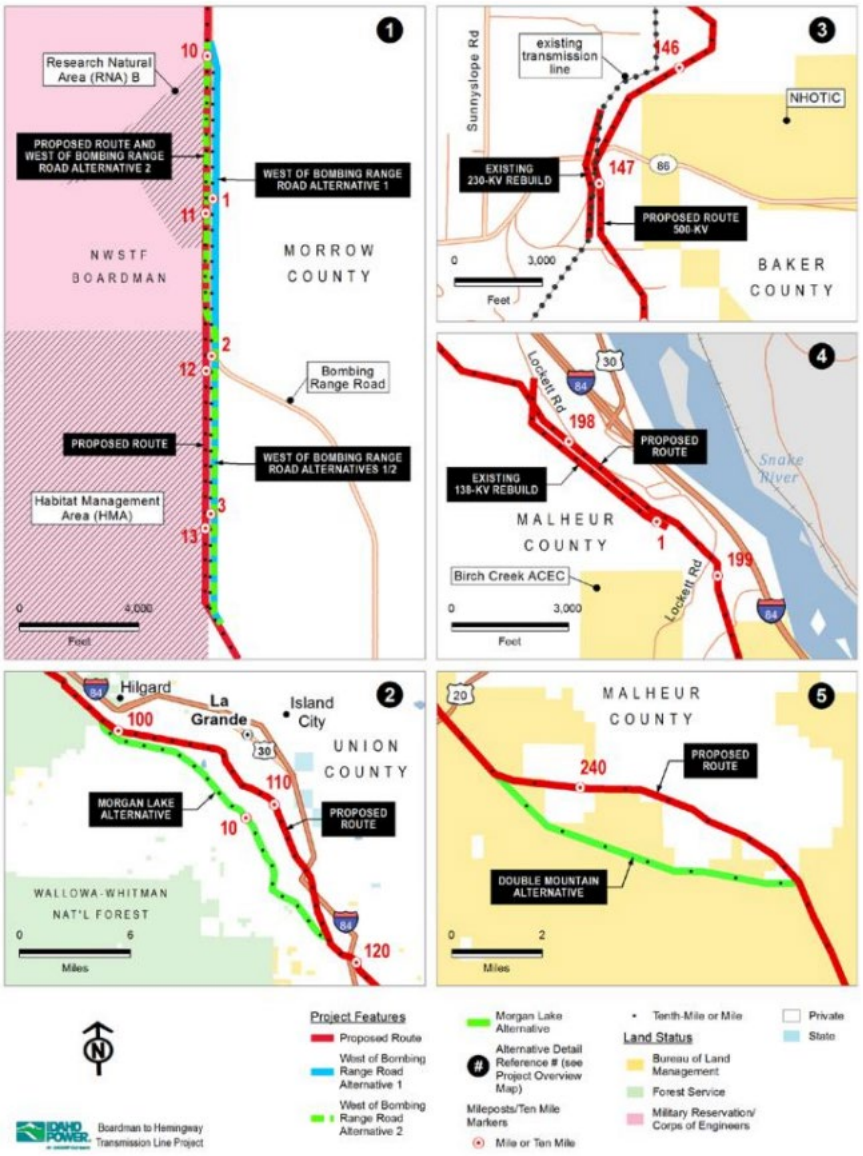
B2H Route EFSC Application

September 30, 2022

B2H Routes Submitted in the EFSC Application for a Site Certificate

2017




1
Research Natural Area (RNA) B
10
PROPOSED ROUTE AND WEST OF BOMBING RANGE ROAD ALTERNATIVE 2
WEST OF BOMBING RANGE ROAD ALTERNATIVE 1
11
1
NWSTF BOARDMAN
MORROW COUNTY
2
12
Bombing Range Road
PROPOSED ROUTE
WEST OF BOMBING RANGE ROAD ALTERNATIVES 1/2
Habitat Management Area (HMA)
3
13
0
3,000
Feet
3
existing transmission line
146
Sunnyslope Rd
NHOTIC
EXISTING 230-KV REBUILD
147
86
PROPOSED ROUTE 500-KV
0
3,000
Feet
BAKER COUNTY
4
Lockett Rd
30
84
198
PROPOSED ROUTE
Snake River
EXISTING 138-KV REBUILD
MALHEUR COUNTY
1
199
Birch Creek ACEC
Lockett Rd
0
3,000
Feet
2
Hilgard
La Grande
Island City
100
30
UNION COUNTY
110
MORGAN LAKE ALTERNATIVE
10
PROPOSED ROUTE
WALLOWA-WHITMAN NAT'L FOREST
84
120
0
6
Miles
5
20
MALHEUR COUNTY
240
PROPOSED ROUTE
DOUBLE MOUNTAIN ALTERNATIVE
0
2
Miles
Project Features
Proposed Route
West of Bombing Range Road Alternative 1
West of Bombing Range Road Alternative 2
Morgan Lake Alternative
Alternative Detail Reference # (see Project Overview Map)
Mileposts/Ten Mile Markers
Mile or Ten Mile
Tenth-Mile or Mile
Land Status
Bureau of Land Management
Forest Service
Military Reservation/ Corps of Engineers
Private
State
Boardman to Hemingway Transmission Line Project

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

Docket PCN 5

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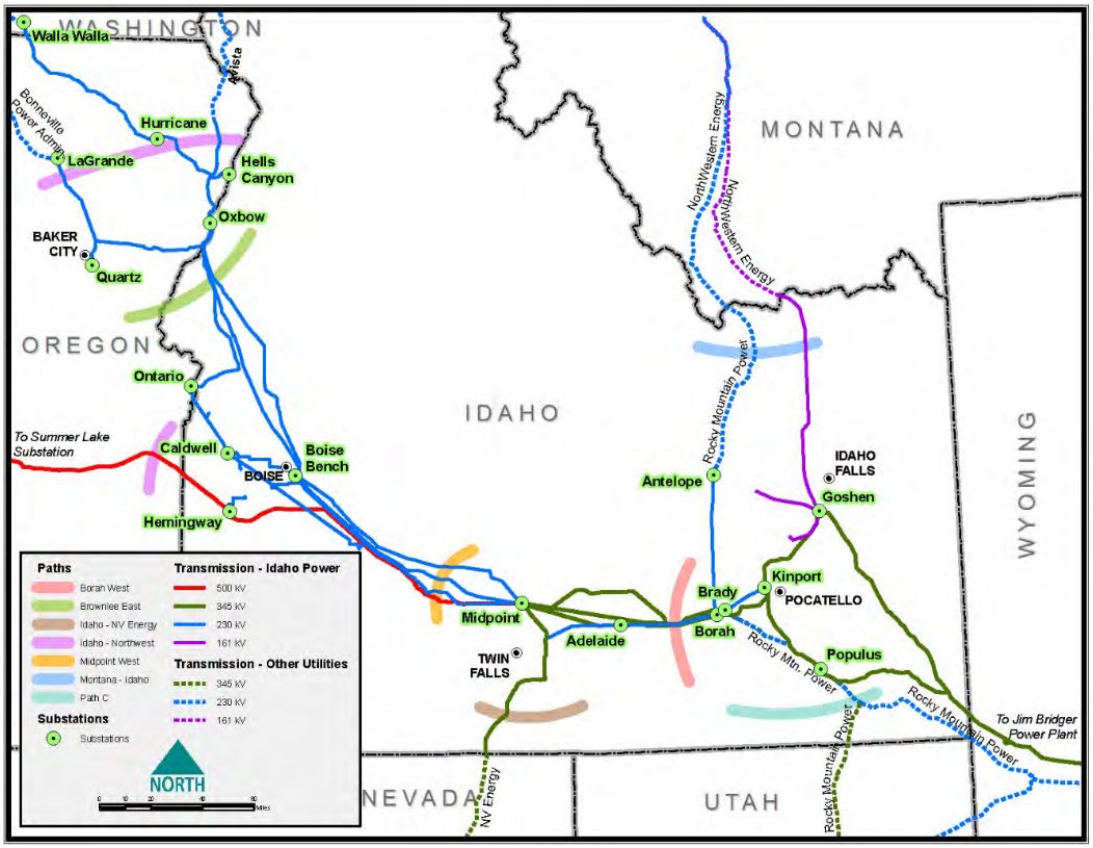
Attachment 8

Idaho Power's Transmission System

September 30, 2022

Idaho Power's Existing Voltage Transmission System



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Attachment 9

B2H Market Diversity

September 30, 2022

The B2H Project's Market Diversity