



January 3, 2023

Regarding:

PCN 5 Idaho Power application for Certificate of Public Convenience and Necessity-CPCN

To: The Oregon Public Utilities Commission (PUC)

By email: PUC.PublicComments@puc.oregon.gov

Dear Oregon Public Utilities Commission,

I am writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the proposed PCN 5 Idaho Power application for Certificate of Public Convenience and Necessity-CPCN.

Greater Hells Canyon Council is a non-profit conservation organization based in northeastern Oregon. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

The PUC is currently reviewing Idaho Power's application for the Boardman to Hemingway electric transmission line (B2H). "As part of its review, the PUC will consider whether the transmission line will meet a need for additional transmission capacity and reliability in the electricity grid; whether it will be operated in a way that protects the public from danger; whether the proposed route is practicable and feasible; whether the public benefits and costs justify the project; and other factors the PUC deems relevant under the law."

We urge the PUC to deny Idaho Power's application. The negative costs of the project to the public do not justify approval of the B2H proposal.

As proposed, B2H will cause negative economic and environmental justice impacts to the communities of eastern Oregon. These are the lowest-income counties in Oregon and they would be negatively impacted by B2H. These same counties would receive little or no economic benefits from B2H. These economic and social justice impacts must be thoroughly analyzed.

A recent "Socioeconomic Report" was commissioned by Eastern Oregon Counties Association, the US Forest Service, Willowa Resources, and Eastern Oregon University. As reported in La Grande's newspaper *The Observer* on December 3, 2022, "Economic data



indicates that if the 10 Eastern Oregon counties in the region were a state, it would rank as the 48th poorest in the United States, with a median household income of \$49,853.50, ahead of only Mississippi and West Virginia.”

Constructing B2H through this region for the benefit of an out-of-state, investor-owned, for-profit corporation is the opposite of a “public benefit” for the communities of eastern Oregon. It is also the opposite of “environmental justice.” We urge the PUC to seriously analyze the negative economic and environmental justice impacts of the B2H proposal.

We understand that the PUC does not review the land use decisions related to B2H. However, we must point out that the Site Certificate related to those land use decisions is currently being appealed at the Oregon Supreme Court.

We must also remind the PUC that these land use impacts caused by B2H have significant economic and environmental justice impacts that are detrimental to eastern Oregon communities. These adverse economic and social impacts *should* be thoroughly analyzed by the PUC as part of the current application for CPNC. In particular, damages to wildlife habitat related to B2H are significant, widespread, and harmful. These negative impacts to wildlife habitat, forests and grasslands have very real consequences for important aspects of our local economy including outdoor recreation, tourism, and hunting as well as our overall quality of life.

Finally, taking land through Eminent Domain is a very serious matter and must absolutely be the last step in any process. Please ensure that the review process is thorough and fair.

Thank you for the opportunity to provide these comments. Please don't hesitate to contact me with any questions.

Sincerely,

Brian Kelly

Brian Kelly, Restoration Director
Greater Hells Canyon Council
La Grande, OR
brian@hellscanyon.org