

To: PCN 5 Service list
 From: Jim Kreider, STOP B2H Coalition
 Re: Staff and Intervenors' Deadline for Topics for Initial IPC-Led Workshop
 Date: 11/22/22

STOP B2H objects to the lack of notification of this deadline to landowners impacted by the B2H transmission line and the general public. STOP already objected in the public hearing on 11/16/22 that the two schedules sent to landowners from Idaho Power are incorrect. No correction has been sent to landowners so how would they know of this or the process to become involved in this docket. This notice was only in a memorandum to the service list which was not designated as the updated procedural schedule. It is not listed in the schedule posted in the docket.

<https://apps.puc.state.or.us/edockets/Docket.asp?DocketID=23460&Child=calendar>

Docket No: PCN 5 **Docket Name:** IDAHO POWER CERTIFICATION OF PUBLIC CONVENIENCE AND NECESSITY Print Summary

* This docket is a contested case. See the [Internal Operating Guidelines](#) and [OAR 860-001](#)

Subject Company: [IDAHO POWER COMPANY](#)

In the Matter of IDAHO POWER COMPANY'S, Petition for Certificate of Public Convenience and Necessity. Filed by Jocelyn Pease. Served to the Electric List on 10/3/2022. Confidential Saved in Agency Folder.

Filing Date: 9/30/2022

Case Manager: SUDESHNA PAL **Phone:** 503-428-9529 **Email:** sudeshna.pal@puc.oregon.gov

Law Judge: JOHN MELLGREN **Phone:**

Law Judge: ALISON LACKEY **Phone:** 503-400-2861

[Email Service List \(semi-colon delimited\)](#) [Email Service List \(comma delimited\)](#)

If you experience problems with the *above* 'Email Service List' links, please try one of these:

[Service List Popup \(semi-colon delimited\)](#) [Service List Popup \(comma delimited\)](#)

<u>ACTIONS</u>		<u>SERVICE LIST</u>	<u>SCHEDULE</u>
Date/Time	Event	Description	
6/30/2023	FINAL ORDER DUE DATE	Target Date for Commission Decision	
5/25/2023	BRIEF DUE	All Party Reply Brief	
5/11/2023	BRIEF DUE	All Party Opening Brief	
4/19/2023	HEARING	Evidentiary Hearing	
4/10/2023	CROSS EXAMINATION STATEMENT DUE	Witness List and Cross-Exam Statements Due	
3/31/2023	TESTIMONY/EXHIBITS DUE	Idaho Power Surrebuttal Testimony	
3/30/2023	MISCELLANEOUS	Exhibits Due	
3/13/2023	TESTIMONY/EXHIBITS DUE	Staff and Intervenors' Cross-Answering and Rebuttal Testimony	
2/21/2023	TESTIMONY/EXHIBITS DUE	Idaho Power Reply Testimony Due	
1/17/2023	TESTIMONY/EXHIBITS DUE	Staff and Intervenor Opening Testimony	
12/5/2022	PUBLIC COMMENT HEARING	Virtual Public Comment Hearing	
	Location: VIRTUAL		
11/16/2022	PUBLIC COMMENT HEARING		
6:00:00 PM			
	Location: EASTERN OREGON UNIVERSITY		
10/11/2022	CONFERENCE	NOTICE OF PROCEDURAL CONFERENCE, Copies served to industry electric list and PCN 5 service lists.	

STOP requests that this docket but put on hold until all landowners are mailed a letter that is approved by the parties. This letter should contain an updated schedule that pushes all dates back in order to give landowners proper time to prepare to become intervenors and submit topics of concern to them.

Topics for Initial IPC lead workshop

1. Fully explain the budget development process since inception of the B2H project. Include the design, permitting, and construction phases of all budgets with detailed cost centers, revenue requirements, and term sheets developed and shared with partners (BPA and PAC). These should include but not be limited to all cost elements including inflation, labor, O&M, materials, permitting, right of way, land acquisition, regulatory and permitting, project management, administration and overhead, contingencies, and level of risk. As suggested in STOP's closing comments in LC 78 IPC's 2021 IRP a review to IPC's transmission cost estimation guide similar to [MISO's April 2022 Transmission Cost Estimation Guide](#) is preferred.
2. Explain why budget information is redacted in the petition and testimonies submitted. What specific trade secrets are hidden in these redactions? Explain how a proper public evaluation of these numbers can be done when so much is redacted.
3. How will the company guarantee that there will not be cost overruns since there is not a contingency budget?
4. Explain and show calculations on each counties property tax values with and without the B2H. How much will the B2H increase each counties property tax values? Share worksheets and any communications with the Oregon Department of Revenue and the 6 impacted counties.
5. Explain the Land Use Permits submitted to the 6 impacted counties? What are they for and what will be the costs.
6. Midline Compensation Station
 - a. Why is it now required?
 - b. How much will the midline compensation station cost?
 - c. How much must B2H be derated from the WECC Phase II rating without the compensation station
 - d. A revised path 14 rating with B2H must be confirmed through WECC before B2H is built and placed into service. The rating proposed by Idaho Power in 2012 was studied assuming Gateway West was in Service, PGE's Cascade Crossing was in service, and Boardman and Centralia coal plants were assumed in operation. What WECC approved Path 14 rating can Idaho Power support now when B2H is studied without phantom transmission lines and without phantom coal plants assumed to be in service?
7. How will the transmission line effect landowners GPS pivots?
8. How will the company reach out to landowners for the well, spring, pond flow testing before drilling bore holes or blasting?
9. What are the socioeconomic impacts to the 6 counties that the B2H will pass through?
10. Are there any Environmental Justice communities impacted by the B2H?
11. Explain the noise mitigation actions along the entire length of the line since the company has a variance to Oregon's noise rules and the noise limits will be exceeded. What is this estimated cost?
12. What is the cost for all mitigation in the site certificate?
13. Idaho Power requested and received a conditional use permit from Wallowa County Oregon to build a new 230 kV switching station to interconnect two 230 kV lines that are part of Path 14 Northwest to Idaho (Palette Junction Switching Station). Furthermore, PacifiCorp has requested and received interconnection and Network Transmission service from Idaho Power out of this new switching station to serve load in Oregon. Idaho Power claimed in their Conditional Use Application in Wallowa County that the new switching station would increase the transfer capability of Path 14 between the Northwest and Idaho by 70 MW.
 - a. Please explain this transmission project that Idaho Power is building in Wallowa County, including how much the switching station is costing ratepayers, and why Idaho Power has failed to disclose this information and associated Path 14 capacity increase in Idaho Power's CPCN Application.
 - b. Has Idaho Power studied a new rating increase for B2H for Path 14 with the Palette Junction switching station in service? If no, why not. If yes, will B2H still provide the anticipated incremental capacity increase on top of the 70 MW increased rating provided by the Palette Junction switching station.
14. How many amendments to the ODOE/EFSC site certificate will be submitted and on what issues?
15. Explain why IPC needs to start construction by 2026? Are their financial incentives that the company will gain by a 2026 completion date? [IPC's 2026 All source request for proposal, UM 2255](#), acquires a combination of energy and capacity resources with as much as 1,100 megawatts (MW) of variable energy resources and a minimum of roughly 800 MW of peak capacity. Energy market bids must begin delivery across Idaho Power controlled

transmission on or before June 2026, when the Boardman to Hemingway Transmission Line (B2H) is expected to be operational [pdf p 4]. Additionally Jim Bridger units 1 and 2 are transitioning from coal to natural gas. The main reason for the B2h was to fill the loss of 354 MW. This is an additional 1,454 MW to IPC's system not to mention the additional 220+ MW to be brought on line before 2026. This is all without the B2H in 2026. Please explain the "rush" to get this CPCN done by June 2022. What is the incentive? Where is the specific short fall?