



"Protect Our Land, Preserve Our Heritage"

STOP B2H Coalition

60366 Marvin Road
La Grande, Oregon 97850
info@stopb2h.org

April 18, 2022

Re: UM 2209 Idaho Power Wildfire Protection Plan

Greetings docket members,

The STOP B2H Coalition appreciates the opportunity to continue to provide input for Idaho Power's (IPC) 2022 Wildfire Protection Plan. Our comments will focus on the Boardman to Hemingway transmission line (B2H) through eastern Oregon.

In concluding our opening comments we stated that the first set of questions and answers lead to a second set of questions. Those questions were submitted to IPC and in email exchanges with the company it appeared that we were going to get answers to the second round of questions. There were a series of delays in getting a response but the companies responses always lead one to believe that the questions were going to be answered. In a March 29, 2022 email we were informed that the company would not be answering the questions submitted.

What follows is the second round of questions, at bottom, and the email thread in date order, from newest to oldest, following up when deadlines slipped and the concluding denial of the request.

Idaho Powers refusal to clarify and show their work on how they determined that the B2H Power line would pose no fire risk to eastern Oregon is unacceptable. STOP demonstrated how Union County and the state of Oregon determined that areas the B2H ran through in the county were high risk fire areas. Someone's work must be incorrect. Until Idaho Power can prove that their work is correct or the states and counties work is wrong Idaho Powers 2022 Wildfire Plan must be denied.

Thank You

Jim Kreider
for the STOP B2H Coalition

----- Forwarded Message -----

Subject:Re: [EXTERNAL]Contact info for new Wildland Fire person

Date:Wed, 6 Apr 2022 09:17:49 -0700

From:jim kreider <jkreider@campblackdog.org>

To:Williams, Alison <AWilliams@idahopower.com>

Hi Alison,

I'm disappointed in the companies lack of response. Feel like I was lead to believe we were in a dialogue on discussing the details of the fire methodologies per my questions. The company fire risk information did not match Union counties fire risk assessments. Nor other eastern Oregon county's fire risk assessments.

I look forward to discussing IPC's fire management plan.

Thank you -- jim

On 3/29/2022 2:20 PM, Williams, Alison wrote:

Hi Jim,

I hope you're doing well following hand surgery and that recovery hasn't been too bad!

I wanted to follow up on your earlier requests. Having discussed with various people within the company, we cannot respond to detailed data requests outside of a formal process or proceeding at the OPUC. We are certainly appreciative and understanding of your interest in Idaho Power's Wildfire Mitigation Plan.

Please don't hesitate to reach out if you would like to discuss further. There will be future opportunities to hear more and participate in exercises about the Company's wildfire mitigation efforts, and I am happy to keep you abreast of those activities if you are interested.

My best,

Alison

--

Alison Williams

Regulatory Policy & Strategy Advisor

Idaho Power | Regulatory Affairs

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From: jim kreider <jkreider@campblackdog.org>

Sent: Tuesday, March 22, 2022 5:10 PM

To: Williams, Alison <AWilliams@idahopower.com>

Subject: Re: [EXTERNAL]Contact info for new Wildland Fire person

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Hi Alison,

Checking in wondering if a response to my last set of questions is coming?

Thanks -- jim

On 3/17/2022 3:21 PM, jim kreider wrote:
Happy St Patties Day,

Just checking in as you mentioned the company would have a response this week to my last set of questions. With final comments due next Friday I'd like to know what my universe of material is. I'm scheduled for a hand surgery Friday so would like to wrap this up.

Thanks -- jim

On 3/8/2022 7:32 AM, Williams, Alison wrote:
Slow and steady/marathon not a sprint are my shared mantras for the time being. Thanks again, Jim. And I'll connect with you again next week.
My best,
Alison

From: jim kreider <jkreider@campblackdog.org>
Sent: Monday, March 7, 2022 4:30 PM
To: Williams, Alison <AWilliams@idahopower.com>
Subject: Re: [EXTERNAL]Contact info for new Wildland Fire person
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Thanks and I realize most everyone is busy beyond belief. I'm trying to make slow and steady my mantra for march but realize the world isn't cooperating. Thanks -- jim

On 3/7/2022 3:19 PM, Williams, Alison wrote:
Good afternoon, Jim. We are currently working on our reply comments in AR 648. I'm aiming to get back to your second round of questions next week.
Thank you for your patience!
-Alison

From: jim kreider <jkreider@campblackdog.org>
Sent: Monday, March 7, 2022 4:18 PM
To: Williams, Alison <AWilliams@idahopower.com>
Subject: Re: [EXTERNAL]Contact info for new Wildland Fire person
KEEP IDAHO POWER SECURE! External emails may request information or contain malicious links or attachments. Verify the sender before proceeding, and check for additional warning messages below.

Hi Alison - checking in since I have not heard back regarding this set of questions. Do you have an ETA?

Thanks -- jim

On 2/23/2022 5:13 PM, jim kreider wrote:

Hi Alison and Wildfire team,

Thank you for the answers to my questions. Like most answers they raise more questions and these are my follow up questions to the answers provided. Unless otherwise noted these questions are focused on the primary B2H and alternate routes in Union county.

3.2 Identifying Areas of Elevated Wildfire Risk

Thank you for sharing the sources of the 4 data inputs used to develop the fundamental physical and environmental features that lead to an elevated likelihood of wildfires. Please share with me the actual data sets by year and calculations to reach the final number(s) used as inputs for the 1) weather conditions, 2) topography, 3) fuel types, and 4) moisture content to determine the: a) fire spread, b) flame lengths, and c) spotting calculations. Please show the calculation(s) for how 1-4 created a-c and the final Fire Probability input value used in the Wildfire risk calculation. Additionally please share the: x) census data used to determine structure density and the final input values used and y) how each fire simulation determined the number of structures affected by a given fire. Show the calculation(s) for the resulting consequence input value used in the Wildfire risk calculation. Please show the values of the Fire Probability and Consequence multiplied to calculate the Wildfire Risk values for all segments developed along the two-kilometer buffer evaluated for the B2H in Union county.

3.2.1. Wildfire Risk Modeling Process

Please share the locations of the Remote Automated Weather Stations used in Eastern Oregon, the raw data and calculations used for the final value of seasonal variation in live fuel moisture per location or segment.

3.2.2. Wildfire Risk Areas

Please share all 3 tier levels along the B2H route in Union county. Show how the unadjusted data compiled for the 6 factors was input into the model? Show unadjusted tier levels on the B2H route and alternates in Union county. Show each adjustment made, why the adjustment was made, the value of the adjustment and the final input into the model. Show adjusted tier levels.

If the unadjusted data is manually adjusted and produces a change in a tier level what appear to be the data point(s) that modified the tier classification?

General Question

Why is the underlying dataset and output of the model not public information? If we cannot see and understand how Idaho Power came to these conclusions why should we believe them to be accurate?

Trust but verify and that is what I am trying to do.

Respectfully – jim