

STOP B2H Coalition
60366 Marvin Rd
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December 14, 2022
VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: LC 78 Idaho Power Integrated Resource Plan Decision on Acknowledgement -- Request for Clarification

Stop B2H Coalition (STOP), would like to offer this clarification to the record for the Decision on Acknowledgement meeting in LC 78 Idaho Power's Integrated Resource Plan held on 12/6/22. In the second video of the meeting at 1h28m45s Commissioner Tawny said, "I also went back and noted that we did acknowledge B2H and PACs last IRP I reread that order and really looked at that analysis as well." STOP believes this statement to not be totally accurate in the context of the *construction* discussion. It is our hope that the record will clarify and correct the statement given the context.

While Commissioner Tawny's statement seems correct, it is not technically accurate. The context of the discussion at the time was around the *construction* of the B2H. PAC has NOT ASKED for acknowledgement to construct the B2H project as Idaho Power did in 2017 in order to pursue its site certificate from ODOE/EFSC.

In IPC's [acknowledgement in order 18-176](#) to construct the B2H in the 2017 IRP the Acknowledged Action Items with Modifications on pdf p 16 reads ..

ORDER NO. **18 176**

Appendix A

Acknowledged Action Items with Modifications

Action Items 5 and 6 (Boardman to Hemingway)

- 5 – Conduct ongoing permitting, planning studies, and regulatory filings.
- 6 – Conduct preliminary construction activities, acquire long-lead materials, and construct the B2H project.

This is the link to [PAC's 2021 IRP Acknowledgement](#) and pages 10-13 cover the discussion on transmission investments. In this discussion the commission overrules staff's recommendation against acknowledgment of either Gateway segment (Rec. 37)" and "Staff also recommends against acknowledging PacifiCorp's Local Reinforcement Projects" and scold PAC for their lack of transparency but there is no mention of B2H.

Going to PAC's action plan on pdf p 25 @ 3c we see that there is no mention of beginning construction just pre-construction and negotiations for a construction agreement.

3c	<u>Boardman-to-Hemingway (500 kV transmission line):</u> <ul style="list-style-type: none">• Continue to support the project under the conditions of the Boardman-to-Hemingway Transmission Project (B2H) Joint Permit Funding Agreement.• Continue to participate in the development and negotiations of the construction agreement.• Continue to participate in “pre-construction” activities in support of the 2026 in-service date.• Continue negotiations for plan of service post B2H for parties to the permitting agreement.
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Therefore, the items PAC requested for acknowledgment were acknowledged. This **did not include acknowledgment to construct the B2H** as was required by Idaho Power to move forward with the B2H to ODOE/EFSC to apply for the site certificate.

If I am mistaken in this clarification I apologize in advance. I respectfully request to be corrected and shown where PAC was acknowledged to construct the B2H. Otherwise, I request, on behalf of the Stop B2H Coalition, that the record be clarified at this time. Thank you for your attention to this matter. I look forward to your response.

Submitted by



Jim Kreider

Co-Chair, STOP B2H Coalition | <http://stopb2h.org/>

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