

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 41**

In the Matter of Idaho Power Company's  
Application to Include the Boardman to  
Hemingway Transmission Line in its  
Acknowledged Integrated Resource Plan  
("IRP")

**STOP IDAHO POWER'S RESPONSE TO  
IDAHO POWER COMPANY'S ANSWER  
TO PETITION TO INTERVENE**

1 Idaho Power Company ("Idaho Power" or "the Company") has filed an answer in  
2 the captioned docket indicating that it does not object to Stop Idaho Power's ("SIP")  
3 Petition to Intervene so long as the scope of the intervention is limited to issues  
4 "relevant to the proceeding." (Answer at 1.) Administrative Law Judge Arlow SIP has  
5 authorized the filing of this response by March 23, 2009.

6 SIP has no *intention* of broadening the issues beyond the statutory and  
7 regulatory limitations. SIP's *motive* in participating in this docket is, as Idaho Power  
8 notes, to prevent the Company's proposed B2H transmission line from crossing any  
9 portion of Malheur land zoned as "exclusive farm use." SIP's efforts in this regard are  
10 supported by hundreds of residents of Malheur County, some of whom would be  
11 economically devastated by such crossings. In addition, Malheur County itself opposes  
12 the Company's crossing of EFU land, as does Oregon's senior United States senator.  
13 SIP plans on contesting Idaho Power's proposed routing of the transmission in all  
14 forums where the potential for derailing that proposal exists; if it is necessary to oppose  
15 need for the line in order to prevent the devastation of EFU farmland, such opposition  
16 will be undertaken.

1           There are a number of issues that SIP plans to raise that clearly do fall within the  
2 Commission's jurisdiction. First, is there a need for the line at all? Recent data suggest  
3 that the demand for electricity is shrinking drastically; of course, as demand for  
4 electricity decreases the “need” for *existing* transmission capacity decreases. In this  
5 docket Idaho Power is proposing to install an extremely high voltage line – the highest  
6 alternating current voltage line now in use in the Pacific Northwest. If the demand for  
7 electricity is less this year than, say, last year, it would be hard to justify *any* increase in  
8 transmission capacity. (There is some evidence that, notwithstanding the recent  
9 economic downturn, the long-term trends of electric consumption are much lower than  
10 past trends.) Second, SIP understands that reasonable alternatives will become  
11 available for moving power from the Hemingway substation to the west, e.g.,  
12 PacifiCorp's proposed 500-kV line that will connect Hemingway substation with the  
13 California-Oregon border. These alternatives may well diminish the “need” for the B2H  
14 line. Third, SIP believes that a substantial challenge to locating the western terminus of  
15 the B2H line at Boardman may be raised, and if the Boardman terminus is defeated it  
16 would seem that Idaho Power would be required to go back to the drawing board.  
17 These and similar issues are clearly within the Commission's jurisdiction and SIP  
18 intends to pursue them vigorously.

19           There are other issues not relating directly to “need” that SIP intends to raise that  
20 also would defeat Idaho Power's application. Most obvious is the Company's attempt to  
21 modify the 2006 IRP order by inserting the B2H line into that IRP. The Company,  
22 however, admits that it will be filing its 2009 IRP in approximately three months. Thus  
23 proceedings on the 2009 IRP will be underway long before the proceedings in this

1 docket are scheduled to conclude. Why the rush? More important, what risks are  
2 created by modifying a prior IRP order that contains stale data when fresh data will be  
3 used in the 2009 IRP, which fresh data would put the B2H into its proper context?

4 In sum, SIP admits that its motive in participating in this docket is to prevent  
5 Idaho Power from devastating Malheur County's EFU farmland. SIP intends to contest  
6 the routing of the line vigorously before the Energy Facility Siting Council. In this  
7 docket, however, SIP intends to put Idaho Power to its proof that there is a "need" for  
8 the B2H line and that its filing to amend a three-year old acknowledged plan on the eve  
9 of preparation and filing of a new IRP containing fresh data should be dismissed on  
10 prudential grounds. In order to develop these points SIP has requested information  
11 from Idaho Power that should tend to demonstrate these points.

12 SIP looks forward to working with Idaho Power, the Commission staff, and other  
13 intervenors in addressing these issues.

14 Respectfully submitted this 23<sup>rd</sup> day of March, 2009.

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket LC 41 on the following named persons on the date indicated below by e-mail addressed to said persons at his or her last known address as indicated below.

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