

JOHN R. KROGER  
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**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

August 4, 2010

Attention: Filing Center  
Public Utility Commission of Oregon  
550 Capitol Street NE, #215  
PO Box 2148  
Salem, OR 97308-2148  
[puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

Re: *In the Matter of Idaho Power Company 2009 Integrated Resource Plan*  
PUC Docket No.: LC 50  
DOJ File No.: 330-030-GN0001-10

Dear Filing Center:

Enclosed are an original and one copy of Oregon Department of Energy's Final Comments in the above-captioned docket for filing with the PUC for today.

Sincerely,

 Sr. MAG

Janet L. Prewitt  
Senior Assistant Attorney General  
Natural Resources Section

Enclosure  
JLP:mme/#2173957  
c: LC 50 Service List

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 50

In the Matter of Idaho Power Company )  
2009 Integrated Resource Plan )  
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OREGON DEPARTMENT OF  
ENERGY'S FINAL COMMENTS

Oregon Department of Energy ("ODOE") appreciates the opportunity to file these Final Comments in the matter of Idaho Power Company 2009 Integrated Resource Plan. These comments below are in support of ODOE's responsibilities to study, evaluate and disseminate information about energy use in Oregon. See ORS 469.030.

**1. Load Forecast-**

ODOE supports the load forecast estimates as provided by Idaho Power Co. particularly the analysis taking into account the region's summer peaking loads and increase in number of larger load customers. Furthermore, in light of increasing evidence of evolving congestion areas in the regions served by Idaho Power Co, ODOE therefore, supports Staff comments ( dated 9<sup>th</sup> July, 2010) finding the load forecast through 2019 to be reasonable but still warranting concern about the time period beyond 2019 and through 2029. ODOE also recognizes the need for Idaho Power to also develop more portfolios under the second ten-year planning process with better load-responses to price analyses if they adopt a "two 10 year split planning framework" for portfolio assessment. In addition, such analyses in future would be robust if it also took into account uncertainty.

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**2. Boardman to Hemingway (B2H) Transmission Project:**

- a. ODOE supports the IRP's identification of a need for affordable and reliable supply of energy resources. The B2H transmission project seeks to transfer a modeled 2250 MW of import and export capability. ODOE supports PUC Staff in seeking better information in any future IRP update on third party subscriptions, right-of-way costs and other upgrade expenses as part of the need for and reasonableness of the project.
  
- b. In addition, ODOE seeks clarification and an explanation of PUC Staff's recommendation for "conditional acknowledgement of the B2H action item," (PUC Staff Final Comments, dated 9<sup>th</sup> July 2010), taking into consideration the "Adopted Guidelines: Investigation into Integrated Resource Planning," Oregon PUC Order No. 07-002 and Errata Order No. 07-047. It is not clear whether the Staff is recommending acknowledgement or denial of the Boardman to Hemingway transmission project at this time.

DATED this 4<sup>th</sup> day of August, 2010.

Respectfully submitted,

JOHN R. KROGER  
Attorney General

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Senior Assistant Attorney General  
Of Attorneys for Oregon  
Department of Energy

SERVICE LIST LC 50

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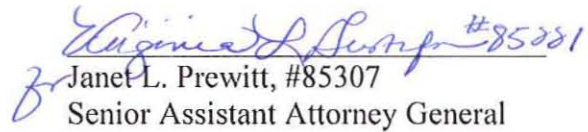
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CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of August 2010, I served the foregoing OREGON DEPARTMENT OF ENERGY'S FINAL COMMENTS upon the persons named on the service list, by mailing a full, true and correct copy thereof to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

DATED: August 4, 2010

 #85307  
for Janet L. Prewitt, #85307  
Senior Assistant Attorney General