

2013 IRP comments

One flaw of the current IRP process is that the Idaho Power picked council (listed on page 2 in Appendix C) does not represent the majority of Idaho Power customers. The council should be made up of new people/interest groups and lose incumbent people/interest groups in an ordered fashion. When confronted with new challenges, the incumbent people/interest groups lack new ideas that are needed for new and better solutions.

The whole IRP process is controlled by Idaho Power so that in the end the plan is the one Idaho Power knows will be preferred. Idaho Power does the modeling. Idaho Power picks the resources, even if other better and less expensive resources exist. In the end Idaho Power picks the portfolios to choose from. Idaho Power determines the costs. My last next door neighbor came from the area by the Boardman coal plant. Her 4 year old son and 8 year old daughter both had asthma. They said many people in the community have asthma. Where is the cost of health care for the people in the communities around the coal plants in the IRP? What other costs are associated with other generation resources? Where do they show up? Cost of smog? <http://www.newscientist.com/article/dn24246-green-energy-pays-for-itself-in-lives-saved-from-smog.html?cmpid=RSS|NSNS|2012-GLOBAL|online-news>

It has been common practice at IRP meetings to show the Peak Day energy load and the generation that was used to meet that load. This information is interesting but has very limited use in the IPR planning process. A one day snap shot can distort the norm. A much more helpful graph would be the average daily load and generation for a month. I would suggest the month of August (for the summer load) and the month of January (for the winter load).

Worldwide climate scientists are in consensus regarding climate change. Many global corporations have blue prints to reduce their greenhouse gas emissions. Scientists know that if we burn all the recoverable coal, gas, and oil that the climate will be unlivable for billions of humans. Coal, gas, oil, and uranium all have limited supplies on the planet earth. Long term, renewable generation resources will have to provide for all of our energy needs. This is where we will have to end up if modern civilization is to continue. The IRP process should address this and plan for a day with renewables powering the entire grid.

Idaho Power's Crown Jewel is its hydroelectric generation system. This system was designed for peak performance based on the climate of the past. Climate Change threatens the performance of this resource. Defending this most precious asset is in Idaho Power's best interest and well as the ratepayer's best interest. The best way to do this is to drastically reduce the amount of green house gases that Idaho Power puts in the atmosphere and at the same time encourage others to do the same.

Idaho Power is a public corporation. Public corporations were originally allowed to form to serve the public. Now it seems that the purpose is to mostly enrich upper management. Corporate profits and the public interest can both be served. Instead of Idaho Power trying to shut down the renewable energy projects with its ad campaign as well as its cases with the PUC, Idaho Power could ask the PUC for a rate of return on purchased power.

I have noticed a mark able difference in Idaho Power's action regarding non-company owned generation in the last two and a half years. It appears to have happened about the same time Lisa Grow took on different responsibilities. I can only guess the decision for the difference in how the company has been acting regarding purchased power was made by the executive board of directors. The campaign has been well funded and broad in its scope encompassing PUC petitioning, bill inserts, a new website, web advertisements, other media, and indoctrinating all employees of Idaho Power. I don't believe it has been at all successful and has actually hurt the company's reputation. I believe mid-level and lower management is following the direction of upper management.

In looking at the Monthly Average Energy Surplus/Deficits with Existing Resources I see for the next 20 years there are many more surpluses than deficits and the deficits for the most part occur in the summer months. Summer months also have Peak-Hour Deficits with Existing Resources.

The most efficient use of Idaho Power's capital is not to build more generation/transmission but to incorporate more efficiency in its systems. I support incentives for energy efficiency and demand side management to reduce the summer peak load. I also support efficiency and conservation education.

So far, rate design has not been addressed in Idaho Power's IRP. With proper rate design, Idaho Power will be able to offer its customers low power bills. Low rates don't always equal low power bills and visa versa. Low bills are ultimately more important for all customer classes than low rates. When we have higher rates with the same or lower bills we know that we are accomplishing the goals of efficiency, conservation, and demand side management. I encourage Idaho Power to address rate design in the 2015 IRP. With all the surplus power available, using smart rate design the surpluses can offset many of the deficits.

The Sales and Load forecasts for the IRP period seem reasonable for the most part.

The Shoshone Falls upgrade does not look to be the best committed resource considering the long term declining stream flows and poor peak capacity. Peak capacity is the deficit and this upgrade does very little to address it, see tables in Appendix C starting page 53. By entrenching a project or line of reasoning at times without re-evaluating the current needs, projects can get built that don't economically meet the current or future demands. A big problem with Idaho Power's portfolio is it lacks balance and diversity. This lack of balance and diversity can be seen in figure 5.4, page 60 IRP. The utility is required to meet load, not exceed load by hundreds of aMW per month. Upgrading Shoshone Falls would be adding unbalance to an already unbalanced portfolio, see figure 3.3 on page 24 IRP. The last thing the portfolio needs is more hydroelectric power! One of the reasons the wholesale price of power sometimes drops below zero in the late spring is because of too much hydroelectric power capacity in the Pacific Northwest. <http://www.eia.gov/todayinenergy/detail.cfm?id=5110> Idaho Power complains about wholesale negative prices of power and blames it on wind, which is one reason. Now they want to add more hydroelectric capacity that is another reason for the wholesale negative price of power. If Shoshone Falls upgrades are completed they can only blame themselves in the future for wholesale negative prices.

Cloud seeding is something the PUC should study very closely. There are studies that show downwind of cloud seeding, less precipitation will fall. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC433258/> This brings up possible liability concerns relating less precipitation and its effects downwind. Studies regarding cloud seeding should be done by the PUC or under the direction of the PUC by a 3rd party. In China a costly snow storm was

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<http://www.popsci.com/science/article/2009-11/chinas-weather-manipulation-brings-crippling-snowstorm-beijing>

As usual, the solar PV prices and capacity factors are not accurate. If utility scale solar was installed it would be unlikely that it would be installed in Boise. More likely it would be installed sunnier Owyhee County close to high voltage power lines or close to the Murphy substation. Using the same PVWatts program that Idaho Power used in Appendix C but instead of the location of Boise, using the location of Murphy changes everything as the kWh/m²/day are much more. Also, on a utility scale a single axis tracker increases peak capacity as well as annual capacity. The inaccuracies with the solar PV prices and capacity result in over estimated nameplate needed to meet 200 MW demand (page 84 IRP). See latest study by the Lawrence Berkeley National Laboratory. http://emp.lbl.gov/sites/all/files/lbnl-6408e_0.pdf.

The consideration of spending money to upgrade coal generation without adding carbon capture seems very short sighted and costly for the ratepayer. Also, the Gateway West transmission project will have questionable value without coal generation equipped with carbon capture.

TAYLOR Annette M

From: ANDRUS Brittany
Sent: Thursday, October 10, 2013 2:20 PM
To: PUC.FilingCenter
Subject: LC 58, Comment from member of public (Idaho Power customer), John Weber, received by PUC staff 10/8/13
Attachments: 2013 IRP comments.doc

Mr. Weber has asked that his comments be made part of the record. Please let me know whether this is the correct process for that.

Thanks,

Brittany

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From: John W [mailto:js_weber@hotmail.com]
Sent: Tuesday, October 08, 2013 8:47 PM
To: ANDRUS Brittany
Subject: Docket LC 58

Dear Brittany,

I would like to comment on Idaho Power's IRP. I am an Idaho Power customer. I feel it might be helpful for my comments to be read by the Oregon PUC as well as the Idaho PUC.

Regards,
John Weber
7855 W Hummel Dr
Boise, ID 83709