

Public Utilities Commission of Oregon
In the matter of Idaho Power Company; 2015 Integrated Resource Plan
Docket No. LC 63
March 3, 2016

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I appreciate the opportunity to comment on Idaho Power Company's Integrated Resource Plan Reply Comments, dated February 19, 2016.

1. 2015 IRP on page 117 is not consistent so the public is not able to compare costs:

Valmy Unit Retirement Date:

Although in the short term the retirement date of either 2019, 2021 or 2025 may not make a difference in this 2015 Idaho Power preferred plans, it seems that the date of 2021 has been established by Nevada Power in their 2013 IRP. (Nevada PUC Docket No. 12-08009) Only portfolio P18 uses a 2021 Valmy retirement date. It would be interesting to have more comparable portfolios, what would change with P16 using the 2021 date? With P6(b) Valmy at 2025; P9 and P8 Valmy at 2019 requiring depreciation recovery.

Is Idaho Power trying to control lowest costs with these comparisons? Staff should request similar comparisons.

2. Public Utility Commission should not acknowledge the B2H at this time:

It is vitally important that the B2H acknowledgement within this IRP be delayed until the 2017 IRP, especially since Idaho Power is requesting no 2015 Update, and the 2017 IRP will be filed in June 2017.

A number of critical events will occur prior to June 2017:

- The BLM will publish the final EIS for the B2H project. This may determine the next steps in the approval process.

- Oregon has via the legislature, determined that coal generation power should not be used in the State. Idaho Power needs to determine the effect this may have on their 20 year plans.

3. Many have questioned the NEED for the B2H as it has been determined by Idaho Power.

I recognize determining need is not the Oregon PUC's focus in acknowledging the IRP, however by specifically acknowledging B2H you do acknowledge the need for the Oregon Energy Facility Siting Council.

The EFSC at OAR Chapter 345, Division 23 in part states: *An applicant may be able to demonstrate that the facility is needed by showing that the proposed facility's capacity is identified in a least cost plan acknowledged by the Oregon Public Utilities Commission.*

It is important that better cost analysis is produced with adequate comparisons in the 2017 IRP to determine if the B2H element is required.

Thank you for the opportunity to comment.

Sincerely,

Gail Carbiener