

Public Utilities Commission of Oregon
In the matter of Idaho Power Company; 2015 Integrated Resource Plan
Docket No. LC 63
January 8, 2016

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I appreciate the opportunity to comment on Idaho Power Company's Integrated Resource Plan Reply Comments, dated December 30, 2015.

My comments to the PUC in October 2015 prompted two Idaho Power engineers who have worked on the IRP to call to discuss personally my concerns. Although we do not exactly agree, both were polite and courteous and we agreed to continue communications.

I have now read Integrated Resource Plans posted on Nevada, Idaho and Oregon PUC internet sites from 2006 to date. It is especially interesting to compare the overlapping issues, such as mutually owned generating assets like Valmy and Jim Bridger and of course B2H.

Idaho Power's last three IRPs are so different that they seem almost to have no connection. It shows me how much is changing even in the short 2 – 4 year period. For a member of the general public, who is not a statistical expert, the changing assumptions tend to make one skeptical.

So much for opinion.

1. Idaho Power's natural gas costs:

Though I was not the only one to question these costs, through Staff's requests, Idaho Power provided a detailed explanation, although most of the data remained confidential.

2. Tipping-Point Analysis:

In 2010 with Docket LC 50 staff requested via No. 16 a tipping point calculation with regard to B2H. Both Idaho Power in their response and Staff in their comments used percentage changes that would alter make the comparisons more favorable.

This year a tipping point analysis was present for P3 and P7 both lower cost rank than the preferred portfolio P6(b). It seems that portfolios without B2H have been discounted completely. Even though P17 and P16 rank high is cost, a tipping point analysis would show what a change in construction costs or subscription rates would be to make either more acceptable. This seems even more appropriate since construction cost have doubled and natural gas prices have declined.

The population of eastern Oregon continues to oppose the B2H alternative.

3. 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, Staff should request similar comparisons.

Thank you for the opportunity to make these comments.

Sincerely,

Gail Carbiener