

Public Utilities Commission of Oregon

Comments

March 20, 2016

Docket No: LC 63

Docket Name: IDAHO POWER 2015 INTEGRATED RESOURCE PLAN (IRP)
Boardman to Hemingway Power Line

We, Jim & Carol Fuji Kreider, respectfully submit the following comments relating to Idaho Power's Integrated Resource Plan (IRP) filed in June 2015. In this plan Idaho Power, in our opinion, does not demonstrate need for the construction of the 500 kV Boardman to Hemingway (B2H) transmission line. In order 07-002 Appendix A states the Oregon Public Utility Commission's adopted IRP Guidelines. Guideline 4 (c) states the following:

Guideline 4: Plan Components.

- c) *For electric utilities, a determination of the levels of peaking capacity and energy capability expected for each year of the plan, given existing resources; identification of capacity and energy needed to bridge the gap between expected loads and resources; modeling of all existing transmission rights, as well as future transmission additions associated with the resource portfolios tested;*

Idaho Power does not do any modeling of their existing transmission rights on the Idaho - Northwest path. Idaho Power states that, "The Idaho–Northwest transmission path consists of the 500-kV Hemingway–Summer Lake line, the three 230-kV lines between the HCC and the Pacific Northwest, and the 115-kV interconnection at Harney Substation near Burns, Oregon. The Idaho–Northwest path is capacity-limited during summer months due to transmission-wheeling obligations for the BPA eastern Oregon and southern Idaho load and due to energy imports from the Pacific Northwest to serve Idaho Power retail load.¹"

We cannot find in the IRP where Idaho Power studied upgrading these lines or running a double circuit to increase capacity to alleviate its stated capacity limitations. This would seem to us to be a logical first step before proposing the construction of a 305 mile transmission line that will have significant negative environmental impacts on the counties that it will pass through.

In addition, taking Boardman offline will create 550 megawatts of transmission capacity on the Idaho–Northwest path, which is currently capacity-limited during summer months. This additional capacity will allow the renewables, wind and solar, that are being developed to be sold in the Pacific Northwest and mid-Columbia power grid, thus getting this energy to market and alleviating Idaho Power's need for new sources of energy to replace Boardman.

The same will be true when the North Valmy Power Plant has been taken offline, freeing up 522 megawatts of capacity. Idaho Power will have a surplus of transmission capacity and can save the ratepayers money by refurbishing existing transmission lines and not building the Boardman to Hemingway (B2H) transmission line .

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¹ Idaho Power 2015 Integrated Resource Plan, p.64