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April 2, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket No. LC 74
2019 Integrated Resource Plan

Attention Filing Center:

I appreciate the opportunity to make comments. I am an Intervenor, however have little technical expertise to question the details within the IRP. However, I have reviewed all IRPs from 2013 to present and attended many of the OPUC meetings and listened to the Idaho Power presentation made on March 31, 2020. I also follow PacifiCorp's IRP LC70 and am amazed at the apparent lack of coordination, especially with Jim Bridger and B2H.

Idaho Power has continued to model B2H as the major resource for the Preferred Portfolio for many years. The Commission has had reservations such as in 2013 IRP, where it recorded; "We decline to acknowledge completion of B2H because it is well beyond the two-to-four-year period for action items." In that 2013 IRP frustration over lack of certainty on partners continued, and in 2017 hearing, then commission Bloom shouted out that he would never allow construction without hearing from PacifiCorp. Questions continued up to the March 31, 2020 presentation.

I have a few questions:

1. How long can IPC go without adding any new resource? In the past we saw a very informative chart that illustrated when the need occurred.

2. With B2H having been delayed for almost 10 years, what serious planning has occurred if B2H is not approved and project cancelled?
3. Can we have a chart or table that agrees with the known coal withdrawals that is used by PacifiCorp? How does that change the cost for Portfolios 2 and 14?

PacifiCorp's reply comments in LC 70 certainly leave one with the impression that the Billion-dollar project is not that important, certainly in the short term as it does not appear in their action plan.

4. Question then is – Can/will IPC provide several illustrations of different partnership construction agreements? For example, different on-line dates, different percent of participation.

Sincerely,

A handwritten signature in cursive script that reads "Gail Carbiener".

Gail Carbiener