



825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232

January 6, 2023

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3398

Re: PCN 5—Idaho Power Company’s Petition for Certificate of Public Convenience and Necessity

PacifiCorp d/b/a Pacific Power (PacifiCorp) encloses for filing PacifiCorp’s Comments on the Procedural Schedule in the above captioned proceeding.

If you have questions about this filing, please contact Cathie Allen at (503) 813-5934.

Sincerely,

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PCN 5

In the Matter of

IDAHO POWER COMPANY’S

Petition for Certificate of Public Convenience and
Necessity.

**PACIFICORP’S COMMENTS ON
THE PROCEDURAL SCHEDULE**

Pursuant to the Administrative Law Judge’s (ALJ) Memorandum dated December 19, 2022, PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) respectfully submits these comments to the Public Utility Commission of Oregon (Commission) regarding the procedural schedule in the above referenced proceeding. Specifically, the ALJ directed that parties may provide their perspective on the impact of the appeals of the Energy Facility Siting Council’s (EFSC) site certificate for the Boardman to Hemingway Transmission line (B2H Transmission line or B2H Project) on the schedule for docket PCN 5 or the Commission’s consideration of Idaho Power Company’s (Idaho Power) Petition for a Certificate of Public Convenience and Necessity (CPCN). In particular, the ALJ indicated that he would like to hear from parties regarding any specific issues on appeal and how these issues may impact the Commission’s review of Idaho Power’s CPCN petition.

PacifiCorp supports the current procedural schedule that allows for a Commission decision in June 2023 for several reasons. A Commission decision in June 2023 allows for the commencement of construction of the B2H Transmission line in the summer of 2023 for an in-service date in mid-2026. A mid-2026 in-service date is essential as it allows the Company to meet a shortfall load-serving capability in 2026 and facilitates the transfer of geographically diverse resources between PacifiCorp’s two balancing authority areas.

Furthermore, while PacifiCorp is not a party in the EFSC site certificate proceeding or the

resulting appeals, there appears to be no significant overlap of issues that would impact the Commission moving forward on a decision in this proceeding; thus, there would be no waste of Commission or party resources.

I. A Commission’s Decision in June 2023 is Essential to Achieve a B2H Transmission Line In-Service Date in Mid-2026

The B2H Transmission line is an approximately 298-mile-long, 500-kV electric transmission line that will extend from a switching station proposed to be constructed near Boardman, Oregon to the existing Hemingway Substation located in Owyhee County, Idaho. Approximately 274 miles of the transmission line is in Oregon. A 24-mile segment of the Project will be in Idaho. Construction of the B2H Project would also require rebuilding 0.9 of a mile of an existing 230-kV transmission line and 1.1 miles of an existing 138-kV transmission line.

PacifiCorp’s 2021 Integrated Resource Plan (IRP) demonstrates the need for the B2H Project in 2026 to avoid a shortfall in load-serving capability, which has only increased since the 2021 IRP was filed. The B2H Project will allow PacifiCorp to export 600 megawatts (MW) of additional generation capacity from its East balancing authority area to its West balancing authority area.¹ Moreover, once the B2H Project is energized, PacifiCorp will receive incremental firm transmission rights from the Bonneville Power Administration needed to serve load in central Oregon. Thus, the B2H Transmission line is a strategic project that can facilitate the transfer of energy of diverse resources between the Company’s balancing authority areas.² PacifiCorp’s 2019 and 2021 IRPs have included accelerated coal plant retirements, and with the retirement of these plants, it becomes increasingly important

¹ PacifiCorp 2021 Integrated Resource Plan at pp. 89; see <https://www.pacificorp.com/energy/integrated-resource-plan.html>

² *Id.*

for the Company to maintain an electric system that allows it to integrate a growing portfolio of clean, renewable energy and storage resources across its two balancing authority areas.³ The transfer of renewable energy into Oregon is important due to House Bill (HB) 2021.⁴ Under HB 2021, PacifiCorp is required to reduce greenhouse gas emissions below the baseline emissions levels by 80 percent by 2030; 90 percent by 2035; and 100 percent by 2040. PacifiCorp is transitioning its generation resources to a non-emitting renewable energy mix and has made substantial progress to meet the requirements of HB 2021; however, a robust electric grid is essential to move resources across PacifiCorp's system to help achieve these goals.

The B2H Project will also improve grid reliability and provide better operational control of the backbone transmission system by interconnecting PacifiCorp's East and West balancing authority areas.⁵ Currently, only one 500-kV transmission line connects PacifiCorp's two balancing authority areas, the loss of which would reduce transfer capability by 1,050 MW. The B2H Project also enhances PacifiCorp's ability to comply with mandated reliability and performance standards.⁶

Any stay of the schedule in this proceeding would delay the start of construction and ultimately the in-service date of the B2H Project. This delay would occur at a critical time when PacifiCorp is facing a shortfall in load-serving capability in 2026 and as it works towards satisfying the requirements of HB 2021. PacifiCorp will be making filings related to the B2H Project with the Idaho Public Utilities Commission and the Wyoming Public

³ *Id.*

⁴ The B2H Transmission line will likely be important in PacifiCorp meeting the requirements in the final Ozone Transport Rule, which is expected in March 2023.

⁵ *Id.* at 90.

⁶ *Id.*

Service Commission requesting commission decisions by June 2023 to ensure that construction can timely commence in the summer of 2023 with an in-service date in mid-2026. It is important that the B2H Project be in service by mid-2026 and PacifiCorp requests that the Commission not stay or make any changes to the procedural schedule that could delay the construction of the B2H Transmission line.

II. The Appeals of the EFSC Certificate Do Not Impact the Commission Decision and Does Not Cause Administrative Inefficiencies

Under Oregon Revised Statute (ORS) 758.015(2), when a CPCN is requested, the Commission is directed “to make its own investigation to determine the necessity, safety, practicability and justification in the public interest for the proposed transmission line and shall enter an order accordingly.”⁷ Under ORS 360.360(1), EFSC is directed to evaluate site certificate applications, which includes siting for transmission lines.⁸ Several appeals have been filed related to EFSC’s site certificate for the B2H Project. PacifiCorp has not been a party to the EFSC process or the following appeals. However, based on the review of the documents filed by Idaho Power on January 4, 2023,⁹ the issues raised on appeal of the EFSC site certificate do not appear to substantially impact a Commission decision on Idaho Power’s CPCN application. The appeals raise questions regarding party status and issues related to siting, such as noise, visual impacts analysis, review required under ORS 469.370(13), review of alternate routes, and mitigation of adverse impacts to historic, cultural, archeological resources.¹⁰ The Commission’s statutory authority is to review Idaho Power’s CPCN application through the lens of evaluating “the necessity, safety,

⁷ ORS §758.015(2).

⁸ ORS §§469.320, 469.360.

⁹ On January 4, 2023, in Docket No. PCN 5, Idaho Power filed the Answering Briefs filed by Idaho Power, as well as the Oregon Department of Energy and EFSC submitted in Oregon Supreme Court dockets S069919 (STOP B2H), S09920 (McAllister), and S069924 (Gilbert). (January 4 Idaho Power Filing).

¹⁰ January 4 Idaho Power Filing, pp. 20, 109, 162, 199-200, 232-233.

practicability and justification in the public interest for the proposed transmission line.” The issues raised on appeal primarily relate to siting issues, which fall under the jurisdiction of EFSC. Thus, the Commission can continue its investigation under the current schedule while the appeals are decided in the Oregon Supreme Court. Continuing with the current schedule allows the process to move forward, and if the CPCN is granted, allows for the timely completion of the B2H Transmission line by mid-2026.

PacifiCorp appreciates this opportunity to comment on the impact of the appeals of the EFSC site certificate for the B2H Transmission line on the schedule for docket PCN 5 or the Commission’s consideration of Idaho Power’s Petition for a CPCN.

Respectfully Submitted on this 6th day of January 2023.



Carla Scarsella
Deputy General Counsel
PacifiCorp d/b/a Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Phone: (503) 813-6338
Email: carla.scarsella@pacificorp.com

CERTIFICATE OF SERVICE

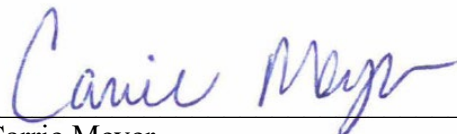
I certify that I delivered a true and correct copy of **PacifiCorp's Comments on the Procedural Schedule** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

Service List PCN 5

KAYE BISHOP FOSS 7JBLIVINGTRUST 774 PHEASANT RD ADRIAN, OR 97901 Onthehoof1@gmail.com	MEG COOKE WHITETAIL FOREST LLV 1601 OAK ST LA GRANDE, OR 97850 meganlatebird@hotmail.com
JAMES FOSS 7JBLIVINGTRUST 774 PHEASANT RD ADRIAN, OR 97901 Onthehoof1@gmail.com	JASON GASKILL OWYHEE OASIS 914 TUPELO DR NYSSA, OR 97913 jgaskill@providedholdings.capital
SUSAN GEER WHITETAIL FOREST LLC 906 OENN AVE LA GRANDE, OR 97850 susanmgeer@gmail.com	F STEVEN KNUDSON (C) FSK ENERGY 2015 SE SLAMON ST PORTLAND, OR 97214 sknudson@threeboys.com
GREG LARKIN Larkingreg34@gmail.com	MARGIE MARIE LYON (C) 878 COYOTE GULCH RD ADRIAN, OR 97901 Marie.lyon@gmail.com
CARL MORTON MORTON CATTLE & HAY 1248 KLAMATH AVE NYSSA, OR 97913 cnjmorton@gmail.com	JULIE MORTON MORTON CATTLE & HAY 1248 KLAMATH AVE NYSSA, OR 97913 cnjmorton@gmail.com
SAM MYERS GENERATION FARM COMPANY Sam.myers84@gmail.com	SKYLAN MYERS GENERATION FARM COMPANY 68477 LITTLE BUTTE CREEK RD HEPPNER, OR 97836 myers.skylan@gmail.com
TIMOTHY PROESCH (C) OWYHEE OASIS 2104 OWYHEE LAKE ROAD NYSSA, OR 97913 owyheeoasis@gmail.com	JOHN WILLIAMS (USPS DELIVERY) PO BOX 1384 LA GRANDE, OR 97850

PACIFICORP	
PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 oregondockets@pacificorp.com	MATTHEW MCVEE PACIFICORP 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 matthew.mcvee@pacificorp.com
CARLA SCARSELLA PACIFICORP 825 NE MULTNOMAH ST, STE 2000 PORTLAND, OR 97232 carla.scarsella@pacificorp.com	
STAFF	
SUDESHNA PAL (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 Sudeshna.pal@puc.oregon.gov	YASSIR RASHID (C) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM, OR 97308 yassir.rashid@puc.oregon.gov
JOHANNA RIEMENSCHNEIDER (C) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM, OR 97301-4796 johanna.riemenschneider@doj.state.or.us	
IDAHO POWER	
JOCELYN C. PEASE (C) MCDOWELL RACKNER & Gibson 419 SW 11 th AVE STE 400 PORTLAND, OR 97205 jocelyn@mrg-law.com ; dockets@mrg-law.com	DONOVAN E. WALKER (C) IDAHO POWER COMPANY PO BOX 70 BOISE, ID 83707 dockets@idahopower.com ; dwalker@idahopower.com
STOP B2H	
JIM KREIDER (C) 60366 MARVIN RD LA GRANDE, OR 97850 jkreider@campblackdog.org	

Dated this 6th day of January 2023.


 Carrie Meyer
 Adviser, Regulatory Operations