

January 9, 2023

Public Utility Commission

Filing Center

PO. Box 1088

Salem, Or 97308

Re: Docket PCN 5, Certificate of Public Convenience

Attention Filing Center:

I am an intervenor in the decisions regarding the Certificate of Public Convenience (COPC). As an Eastern Oregon landowner severely impacted by the decision regarding the COPC, I believe I can speak for landowners that are subjected to Condemnation of their land due to the decision to issue this Certificate. My comments refer to the PUC charge to “ensure Oregonians have access to safe, reliable and fairly priced utility services that advance state policy and promote the public interest.”

Idaho Power Company has spent millions of dollars paying public agencies and their legal staffs to promote the development of this line over well known objections of Oregon citizens and utility users that do NOT want B2H built.

A review of the public comments provided to the BLM and EFSC in their decision process, show an overwhelming percentage of the comments objecting to B2H's transmission line. The objections in the comments included:

- ◆ Lack of benefits to Oregon citizens and electric users by failing to justify the costs.
- ◆ Idaho Power has the ability to obtain more reasonably priced renewable energy by supporting developments within Idaho that would not necessitate B2H.
- ◆ Many reasons why Oregon citizens do not need the B2H line have been brought before IPC, ODOE and EFSC repeatedly, stating opposition, and why it should not be built and still the project gets a Site Certificate.
 - ◆ There are safety and health concerns, resource damage, and a host of additional reasons not to build it. The line will effect my personal health and safety as it parallels the access road to my property. I will have to park

underneath the powerlines each time I stop and unlock the gate to and from my home, exposed to the electromagnetic field and corona noise. This is a threat to my health and well being. I concur with the arguments submitted in these processes and submit that they be considered evidence in support of refusing to issue a Certificate of Public Convenience.

The following apply to the landowners where the properties are adjacent to the transmission line; where it will cross private property lines, and have indirect impacts, or private property will be subjected to Condemnation of lands:

1. The Oregon PUC should not consider Idaho Power's stated need to utilize the transmission line to purchase and transport renewable energy to out of state retail or wholesale purchasers. The Oregon PUC is charged with determining that Oregonians have access to safe, reliable and fairly priced utility services and B2H provides none of that to them. Some landowners will experience significant economic loss from losing portions of land that provide income or have to sell their land at devalued prices to move away from the negative impacts of living near a powerline. That is not consistent with protecting Oregonians economic well being. Building B2H will come with a host of adverse costs to Oregon while completing the desired economic goals of Idaho Power Company. IPC is not planning to compensate the citizens for the actual loss of income or increased costs the line will cause over its lifetime causing further economic hardship.

2. According to the US Energy Department, and Oregon Department of Energy, Oregon currently produces more renewable energy than the citizens use. The state is a net exporter of energy already. This transmission line will only serve to provide opportunity for additional out of state utilities to increase the competition for locally produced energy and will result in increased costs to Oregon utility users.

3. No assessment of the health and safety impacts to the residents who will be exposed to noise, electromagnetic fields, etc., has been completed by IPC. No evaluation of increased noise impacts exceeding state standards of DEQ noise limits have been completed. Additionally, increased noise effects beyond the limits required by Oregon Statutes and Rules has been not been completed. I suffer from severe tinnitus and the corona noise predicted to occur 650 feet from my home will result in forcing me to relocate. I predict this would occur if I had normal hearing as few people would be able to tolerate the constant buzzing and crackling noise of the transmission lines. There are residences within ½ mile of the (300

mile) transmission line who can experience various health impacts resulting in their forced relocation.

4. The developer is not proposing timely monitoring that will assure that safety issues related to the exposure to energized lines or energized equipment and metal objects will not create health and safety issues for those working around or under transmission lines during the life of the project. This includes fighting fire, line maintenance, noxious weed removal, or any human activity involved with the transmission line.

5. I live on a forested ridge one mile south of Morgan Lake that is designated as having the highest (extreme) fire risk in Union County, OR. IPC is not providing location specific fire management programs that address the high fire hazard areas existing along the transmission line. In fact, IPC actually claims that there are no high risk areas along the entire transmission line! B2H will create a significant risk to all those in high fire areas being crossed by this transmission line, with no safety provision or plan for this safety risk.

6. Stating that electricity users in areas served by small electric utilities who obtain their electricity from Bonneville Power will not be impacted by increased costs to purchase electricity from Bonneville Power makes no sense. When Idaho Power starts purchasing power and competing for power produced by Bonneville Power, or other renewable power in Oregon, the costs of that power will increase due to the increased competition for purchasing it. Inflation happens when you have more demand for a limited supply of anything, including energy.

7. All customers in Oregon served by any utility that either pays for a portion of the transmission line or purchases electricity that is moved along the transmission line will have increased costs due to the use of the line. Idaho Power has only submitted information regarding a need for 25% of the transmission line which includes moving energy out of Oregon on a wholesale basis to out of state customers. They are now saying they will absorb the costs and use of 50% of the development of the B2H line with no supporting justification for this need or cost. They are claiming that they can sell part of their share to some other unknown utility in their Non-Binding agreement. That means three things: 1. No one is stepping forward to commit to this cost and use of the transmission line; 2. That virtually any customer who uses electricity may be paying for this transmission line without any warning of the impact it will have on their rates and absent any opportunity to object to this line; and 3) Oregon electricity users can be expected to be forced to pay increased costs to compensate for the costs of between 50% and 75% of this transmission line either directly or indirectly with minimal benefit from it and provide the means by which Idaho Power can benefit from access and

sale of wholesale energy. As a result, the Oregon Public Utility Commission should be considering all Oregon electricity customers as subject to the costs associated with the construction of the utility line and deny the Certificate of Public Convenience due to the cost and lack of benefits to Oregon citizens.

8. In terms of the Certificate of Public Convenience, the developer has not even finalized their planned route. The federal **BLM-preferred route** several miles to the west of La Grande must be considered thus saving: Morgan Lake Park, Twin Lake wetlands, Glass-Rice Natural Area, and better protect numerous rural homes facing corona noise intrusions that are predicated to exceed the state's noise control standards. They have already submitted an Amendment to add land to the development in all of the counties being crossed which were not included in the site when the transmission line boundary was approved. This includes adding access roads and changing the transmission line route.

8. It is clear that Idaho Power has not provided the information required by ORS 758.015 related to developing this line in Oregon. The purpose of the line is intended to primarily benefit Idaho Utility users and unknown other out of state purchasers of energy produced in Oregon. The developer has not provided justification for the need for the transmission line based upon Idaho Power's submissions to the Public Utility Commission which only attempted to justify 25% of the costs and need for the line when in fact, they are now admitting that they will have ownership of 50% of the line. No other group has come forward justifying the additional 50% of the line not currently budgeted for. The PUC staff have gone on record stating that the proposal including the transmission line is basically equal to other plans which do not include the transmission line and which would avoid the damages and costs to me, other landowners and utility users in Oregon.

9. Idaho Power has not provided information regarding the ability of existing transmission lines to carry the energy they indicate they need through hardening of existing lines and establishing the true capacity of the lines based upon FERC requirements that renewable energy developments be required to provide a consistent amount of electricity being placed on transmission lines. This necessitates the use of battery backup and other methods to remove the need to reserve line capacity adequate to accommodate the radical changes in energy being placed on existing transmission lines.

10. The cost figures being provided by Idaho Power are not believable. The costs of every item, every employee being used to construct this transmission line have experienced significant increases since 2016 but Idaho Power claims their costs have not increased. This can only be seen as a manipulation of figures to

hide the true cost of this transmission line to make it appear to be a reasonable alternative to not building it. According to the Bureau of Labor Statistics, consumer prices are 1.24 times as high in 2022 as they were in 2016. The inflation rate currently is 7.11% which if it continues will make the projections even more ridiculous. This developer needs to document what items they considered in their 2016 budget, which of those items continue to be in their budget or have been removed, what the current costs would be and project what the costs will be by the time construction actually occurs. What will be shown is that the costs of this transmission line will increase while the costs of locally generated wind and solar energy is decreasing making this project increasingly unjustifiable over even a few years.

Greg Larkin, Intervenor
59655 Morgan Lake Road
La Grande, Oregon 97850