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**VIA ELECTRONIC FILING**

April 19, 2024

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

Re: Docket No. LC 84 - Idaho Power's 2023 Integrated Resource Plan: Update on Boardman to Hemingway Timing

Dear Commissioners and IRP Stakeholders:

Idaho Power Company ("Idaho Power" or "Company") has become aware of new information with respect to the Boardman to Hemingway Transmission Line ("B2H") that impacts the Company's 2023 Integrated Resource Plan ("IRP"), which is currently under review in Docket No. LC 84. Specifically, the Company has new information that first energization of B2H will not occur by the summer of 2026 as contemplated in the 2023 IRP Preferred Portfolio of resources.

In the Company's 2023 IRP, the Preferred Portfolio—the optimal resource portfolio that balances least cost and least risk—identifies the online date for B2H as July 2026.<sup>1</sup> This timing is reinforced in the 2023 IRP Near-Term Action Plan, which lists B2H with a summer 2026 online date.<sup>2</sup> At the time of modeling the 2023 IRP, which occurred between November 2022 and August 2023, Idaho Power's most up-to-date information and analysis of B2H supported the summer 2026 online date.

However, Idaho Power also identified in the 2023 IRP process that the Company was operating—and continues to operate—in a highly dynamic environment and that decisions and actions identified in the 2023 IRP could shift in real time based on updated information. The Company stated: "Due to the increased level of uncertainty surrounding several important near-term decisions, the 2023 IRP has been prepared in a manner intended to provide the flexibility and adaptability necessary to inform decisions as more information becomes known before the next planning cycle."<sup>3</sup>

To this end, Idaho Power conducted additional modeling of B2H with a fall 2026 online date, recognizing the importance of having modeling to support changes that could occur in a

<sup>1</sup> Idaho Power 2023 IRP, Table 1.1, p. 6.

<sup>2</sup> *Id.*, Table 1.3, p. 9.

<sup>3</sup> *Id.*, p. 2.

dynamic energy landscape. The fall 2026 B2H timing was the focus of three of ten main cases analyzed within the 2023 IRP.<sup>4</sup> Because a specific month is necessary for IRP modeling, the fall 2026 B2H date was identified as November, and the modeling analysis for B2H alternative timing involved holding the November 2026 date constant and (1) converting Valmy Units 1 and 2 from coal to natural gas (main case 4), or (2) converting only Valmy Unit 2 from coal to natural gas (main case 5), or (3) not converting Valmy Unit 1 or 2 (main case 6).

These alternative B2H timing scenarios show that the November 2026 B2H online date with the Valmy Unit 1 and 2 conversion (main case 4) is the next least-cost portfolio after the Preferred Portfolio—with net present value (“NPV”) of \$9,767 million compared to the Preferred Portfolio’s NPV of \$9,746 million.<sup>5</sup>


Idaho Power now believes, based on new information, that the main case 4 analysis (with November 2026 B2H timing and the Valmy Unit 1 and 2 conversions) represents the Company’s best assessment of a Preferred Portfolio.

The anticipated new timing of B2H is informed by ongoing activity at the United States Bureau of Land Management, Oregon Department of Energy, and Oregon’s Energy Facility Siting Council. The timing of these agency actions and required approvals is largely outside of the Company’s control, which is why Idaho Power produced the alternate timing analysis in the 2023 IRP.

Idaho Power recognizes and appreciates that this new information comes midway through the procedural schedule for LC 84, and at a particularly inconvenient time for Commission Staff considering its final round of comments on the 2023 IRP are scheduled for April 25, 2024. As such, the Company understands that the Commission, Commission Staff, and other parties may seek additional information and request a modification to the LC 84 schedule, an action that Idaho Power would support. Should this update letter be deemed sufficient considering the additional analysis contained within the 2023 IRP, Idaho Power is also ready to move forward with this case without delay.

The Company appreciates all parties’ ongoing involvement in the IRP process and LC 84, and hopes that this informational update is received in the spirit of full transparency and collaboration with which it is intended. If you have any questions about these Comments, please do not hesitate to contact me at [awilliams@idahopower.com](mailto:awilliams@idahopower.com) or (208) 388-2872.

Very truly yours,



Alison Williams

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<sup>4</sup> *Id.*, p. 125.

<sup>5</sup> *Id.*, Table 10.2, p. 126.