Connie Aschenbrenner
Director of Regulatory Affairs
caschenbrenner@idahopower.com

October 27, 2026

VIA ELECTRONIC FILING

PUC.FilingCenter@puc.oregon.gov

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

Re: RE136 - Transmission Updates: 3rd Quarter 2026

Attention Filing Center:

Attached please find the 3rd Quarter 2026 Transmission Update regarding the Gateway West and Boardman to Hemingway transmission projects. This update provides a description of the developments that transpired in the third quarter of 2026.

This filing should be brought to the attention of Matt Muldoon, Program Manager. If you have any questions, please contact Regulatory Projects Coordinator Courtney Waites at (208) 388-5612 or cwaites@idahopower.com.

Sincerely,

Connie Aschenbrenner

CA/sg
Attachment

1221 W. Idaho St (83702)
P.O. Box 70
Boise, ID 83707

Idaho Power Company's
Transmission Update for 3rd Quarter 2026
October 27, 2026

In late 2013, Staff of the Public Utility Commission of Oregon ("Commission"), requested[1] that Idaho Power Company ("Idaho Power" or "Company") provide quarterly updates regarding the Gateway West transmission project ("Gateway West") developed jointly between PacifiCorp and Idaho Power ("Companies"). Commission Staff requested that, for each sub-segment[2] of this project, the Company provide a description of the developments[3] that transpired in the previous quarter. Similarly, in 2017, Commission Staff requested[4] that Idaho Power provide updates on the permitting or completion of the Boardman to Hemingway Transmission Line Project ("B2H"). Finally, in 2023, the Commission directed Idaho Power to document the Company's monitoring and pursuit of grant opportunities for B2H.[5] The Company committed to providing updates as part of this quarterly notification.

Gateway West

On November 14, 2013, the Bureau of Land Management ("BLM") released its record of decision ("ROD") authorizing Segments 1 through 7 and 10 of Gateway West. The BLM postponed a decision on the remaining segments — Segment 8 (Midpoint to Hemingway) and Segment 9 (Cedar Hill substation to Hemingway) — to resolve routing in the affected areas.

On May 5, 2017, President Trump signed into law the Consolidated Appropriations Act of 2017, which incorporated by reference the Morley Nelson Snake River Birds of Prey National Conservation Area Boundary Modification Act ("Modification Act"). The Modification Act directed the Secretary of Interior to issue a right-of-way for the portions of the Companies' preferred routes for Segments 8 and 9 that are located within the Snake River Birds of Prey National Conservation Area ("NCA"). On April 18, 2018, the BLM released a record of decision authorizing Segments 8 and 9.

In March 2023, PacifiCorp, as Project Manager, initiated the pre-construction phase of approximately 620 miles of 500-kilovolt ("kV") transmission line from the Populus substation near Downey, Idaho to the Hemingway substation near Melba, Idaho, known as Segment E[6]. Idaho

---

[1] Commission Staff Data Request No. 1, Transmission Updates Docket, dated December 17, 2013.

[2] Segment E extends across southern Idaho and is comprised of the following sub-segments: Hemingway to Cedar Hill, Hemingway to Midpoint, Midpoint to Cedar Hill, Midpoint to Borah, Borah to Populus, Cedar Hill to Populus; and Segment D comprised by the following sub-segments: Populus to Bridger, Bridger to Aeolus, and Aeolus to Windstar.

[3] As defined in Staff's Data Request No. 1, by developments, Commission Staff means any federal, state, and local permitting, regulatory, and other events.

[4] Commission Staff Data Request No. 65, Docket UE 316.

[5] Docket LC 78, Idaho Power 2021 Integrated Resource Plan, Order No. 23-004.

[6] Segment E extends across southern Idaho and is comprised of the following sub-segments: Hemingway to Cedar Hill, Hemingway to Midpoint, Midpoint to Cedar Hill, Midpoint to Borah, Borah to Populus, Cedar Hill to Populus.

1221 W. Idaho St. (83702)
P.O. Box 70
Boise, ID 83707

Power and PacifiCorp continue to coordinate the timing of next steps to best meet customer and system needs.

3rd Quarter 2026 Project Developments

Current permitting and pre-construction activities are focused on Segment E-8 ("Segment 8"), the section of line between Hemingway and Midpoint substations. Idaho Power's ownership interest in Segment 8 is 99 percent. Cultural and environmental surveys are in progress. Right-of-way acquisition activities are underway and over 25 percent complete. Federal and county permitting is in progress. Geotechnical borings are approximately 92 percent complete. The 90 percent design package has been accepted as complete by Idaho Power and PacifiCorp, and the Engineer of Record is now developing the 100 percent engineering design package.

On April 3, 2026, Idaho Power and PacifiCorp filed a joint request that the Idaho Public Utilities Commission ("IPUC") grant both Companies a Certificate of Public Convenience and Necessity ("CPCN") for Segment 8. An IPUC decision is pending. Idaho Power and PacifiCorp have released the Request for Proposal bid package for material procurement and construction to qualified bidders. Idaho Power anticipates taking over the project management for construction of Segment 8 and expects the in-service date for the first portion of this section of the line will be no earlier than 2028.

Boardman to Hemingway

The Companies are parties to the B2H Transmission Project Construction Funding Agreement to jointly support and contribute funds for the design, engineering, procurement, construction and commissioning of a new, approximately 300-mile-long, 500-kV, single-circuit electric transmission line from the proposed Longhorn Substation near Boardman, Oregon to the Hemingway Substation near Melba, Idaho. Idaho Power's ownership interest in the project is approximately 45 percent, and is the construction project manager for B2H. PacifiCorp has the remaining approximately 55 percent ownership interest. All necessary ROD's have been issued for B2H.[7] In addition, the Oregon Department of Energy's ("ODOE") Energy Facility Siting Council ("EFSC") issued a site certificate for construction across five counties in eastern Oregon, which was affirmed by the Oregon Supreme Court in March 2023.

Integrated Resource Plan. On May 23, 2018, the Commission issued Order No. 18-176 in Docket LC 68 that specifically acknowledged Idaho Power's 2017 Integrated Resource Plan's ("IRP") action items to conduct ongoing permitting, planning studies, and regulatory filings for the B2H transmission line, as well as to conduct preliminary construction activities, acquire long-lead materials, and construct the B2H project. Each subsequent IRP Idaho Power has filed, again identified B2H as part of the Company's preferred portfolio, with near-term action items, including B2H construction activities.

Petition for Certificate of Public Convenience and Necessity. On September 30, 2022, Idaho Power filed a Petition for a CPCN authorizing construction of B2H. The Petition was filed in

[7] The BLM issued its ROD in November 2017, for the project to cross approximately 86 miles of BLM-administered land, the U.S. Forest Service issued its ROD in November 2018 authorizing the project to cross approximately seven miles of National Forest lands, and in September 2019, the Department of the Navy issued its ROD authorizing the project to cross approximately seven miles of Department of the Navy lands.

compliance with the CPCN rules approved in Docket AR 626, which require utilities to petition the Commission for a CPCN if condemnation of land or an interest therein may be necessary for construction of the transmission line. The Commission granted a CPCN on June 29, 2023. Three landowners along the B2H route filed complaints with the OPUC seeking reconsideration of the CPCN granted for B2H, but in November 2025, the OPUC upheld the B2H CPCN. Those parties then filed three complaints in the Baker County and Union County Circuit Courts challenging the OPUC decision. All three cases have been voluntarily dismissed by the landowners.

3rd Quarter 2026 Project Developments

Idaho Power began construction of the project in Malheur County in June 2025, and to date, over 1,200 structure pads and their associated access roads, 1,000 foundations, and 740 structures (out of approximately 1,300) have been completed. The first tower was fully erected in October 2025. Construction is occurring in all six counties. The anticipated in-service date is late 2027. Total cost estimates for the project are between $1.5 billion and $1.7 billion.

Federal Permitting. The Construction Plan of Development, comprised of approximately 32 submittals, was approved in December 2023. A conditioned notice to proceed ("NTP") was issued by the BLM on November 12, 2024, which allowed for ground disturbing activities once the conditions are met. The BLM has now released all structures on federal land for ground-disturbing activities across eleven approvals.

> *Section 106*. Cultural compliance is a condition governed by Section 106 of the National Historic Preservation Act. In March 2026, all key cultural reports were deemed complete by the BLM. Nineteen inadvertent discoveries have occurred to date, and in each instance, the parties have followed the inadvertent discovery plan as outlined in the Programmatic Agreement. If a site is eligible, construction will halt until consulting parties review the report on the specific eligible site and the Idaho or Oregon State Historic Preservation Office concur with the findings in the report. To date, 16 inadvertent discoveries have been released for construction.

Oregon Permitting – Site Certificate. On May 22, 2026, ODOE issued an updated Preconstruction Compliance Verification letter concurring that the pre-construction conditions have been satisfied for the project, releasing all structures for construction in Oregon. ODOE is inspecting the Project monthly and there is currently one active notice of non-compliance.

A lawsuit was filed in Morrow County Circuit Court alleging that EFSC impermissibly changed the Fire Prevention and Suppression Plan, a condition of the site certificate. Following the filings of Motions to Dismiss submitted by Idaho Power and ODOE, the Morrow County Circuit Court dismissed the lawsuit. Petitioners in the case filed an appeal of the decision at the Oregon Court of Appeals.

Construction Activities. In June 2025, Idaho Power executed the Guaranteed Maximum Price Amendment with Quanta Infrastructure Solutions Group ("QISG"), authorizing transmission line construction. QISG has received 99 percent of the material.

Coordination Utility Projects. Detailed design of the B2H line terminal at Longhorn was kicked off by Bonneville Power Association ("BPA") in December 2025 and a tri-party Design Agreement executed. An Amendment for material procurement was executed in June 2026. BPA's contractor

is working on the 90 percent indoor design package. A second amendment to incorporate construction into the scope of the tri-party Design Agreement is routing for signature.

The series capacitors and shunt reactors originally planned for the BPA Longhorn substation will be located at a new PacifiCorp substation, Maverick. A draft Maverick Construction Agreement between Idaho Power and PacifiCorp is in review.

Right-of-Way. Idaho Power has secured access rights and easement agreements or advanced occupancy orders for the entire project. Currently, there are 10 condemnation cases remaining in progress, with Idaho Power having secured possession and the right to construct B2H in all of those. Idaho Power continues to schedule depositions with landowners and is prepping for the remaining trials to determine the total compensation to be paid for the B2H easements, though it is making progress in settling cases outside of trial, with 23 settlements.

Malheur Mining Company ("MMC") holds numerous unpatented mining claims from 1986 and 2025 on BLM land that overlap B2H's BLM ROW grant. After making substantial efforts to work with MMC to co-locate, and MMC refusing to accept proposed alternatives, Idaho Power determined that MMC was not open to any micro siting. MMC filed a complaint in US District Court (Pendleton Division) on July 15, 2026, against both Idaho Power and the BLM. After Idaho Power filed a motion to dismiss the complaint, MMC filed a motion for a temporary restraining order and/or a preliminary injunction and then filed an amended complaint. Idaho Power has since filed a renewed motion to dismiss the amended complaint.

Idaho Power filed an opposition to MMC's motion for a temporary restraining order and/or preliminary injunction on September 15, 2026, explaining MMC lacks valid property interests on which to make their claims as they have not confirmed a valid discovery on their mining claims, have not conducted any activity in the field on their claims in over 25 years, do not currently have authorization for any exploratory drilling, and do not meet the standard to succeed on the injunction claims. In its opposition, Idaho Power also described the significant impacts of an injunction on the B2H project and the public interest benefits of continued construction.

In October, a federal judge denied MMC's request for a temporary restraining order, indicating MMC did not meet any of the legal factors necessary for such an extraordinary remedy and MMC's significant delay in bringing the motion confirmed the lack of urgency and irreparable harm. The parties are coordinating to determine next steps, which may be to proceed through a discovery process and expedited trial on the issues or a full preliminary injunction hearing, pending the Court's decision on Idaho Power's outstanding motion to dismiss. Idaho Power is also working with survey contractors and a mining appraiser to prepare documents necessary to begin the condemnation process of MMC's alleged unpatented mining claims in the meantime. The towers on MMC's mining claims have been erected.

Federal Funding Opportunities. The Company continues to monitor and evaluate federal funding opportunities for transmission projects in an effort to reduce costs to customers however, currently there are no programs for which B2H may be eligible or that would reduce costs for customers.