BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IN THE MATTER OF IDAHO POWER COMPANY'S **PETITION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**	**Docket: PCN 5** **Intervenor Cross-Answering and Rebuttal Testimony** **Wendy King**

Date: March 20, 2023

Wendy King, Intervenor

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To the authority of Oregon's PUC, I would like to respond to Mr. Lautenberger's reply testimony. He states: "Idaho Power is sympathetic to the impacts felt by the affected communities that are still recovering from the 2020 Labor Day Fires, however, to the extent Ms. King is implying that the Project is likely to ignite a fire of comparable scale, I would disagree with that implication" (Idaho Power/1300/Lautenberger/60@20-23). Mr. Lautenberger has chosen to label the Holiday Farm Fire as "2020 Labor Day Fires" in an attempt imply that "preexisting fires" were a possible cause of our disaster which is not correct.

Exhibit 1

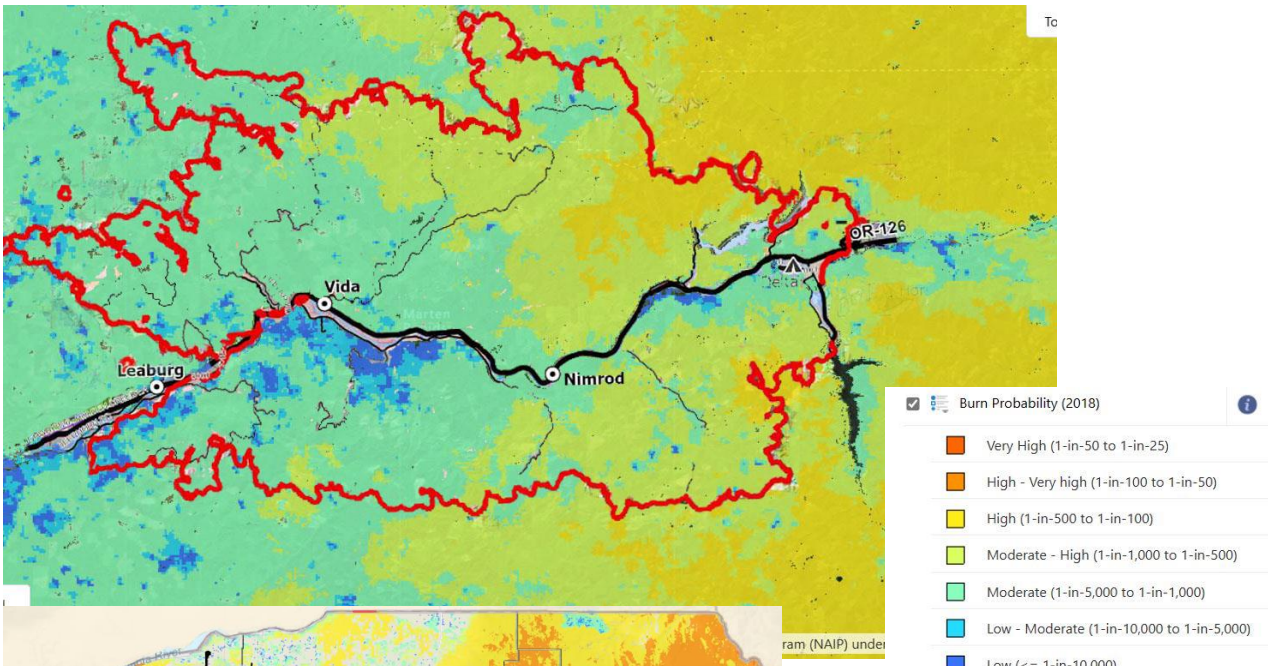
Exhibit 1: is a photo taken the night of September 7, 2020. Tokatee Golf Clubhouse in the foreground, fire to the West. Note the American flag unfurled by wind. Photo by Ty Patton, Tokatee Greens Superintendent

Upper McKenzie rural fire Chief Rainbow Plews confirmed in an interview on February 8, 2023, that there were no other fires on the landscape before this fire started. The Holiday Farm fire was a newly ignited fire sparked by a 115kV powerline. The blaze was rapidly spread by +50mph East winds.

While Mr. Lautenberger may disagree with my implication that the Project is likely to ignite a fire of comparable scale, and would prefer to disregard this testimony as relevant, he has chosen to cite the record of a 230 kV transmission line that runs parallel to the proposed B2H line to give reference of an even lower fire risk: "the Quartz to LaGrande High Voltage transmission line appears to have no evidence of causing a fire" (IdahoPower/1300/Lautenberger/23). He's indicated this line has been successful for seventy years. However, because there is no analogous data for either Oregon or Idaho, it is likely that no fire documentation exists for its 70-year service. Furthermore, there is evidence that the transmission line below Quartz did start a fire. If another line can be used as evidence in the safety of the proposed line, Mr. Lautenberger would need to then acknowledge the fire record from the 115kV Transmission line that sparked the Holiday Farm fire. His argument does not prove the B2H 500kV line has low fire risk because of the success of a different type of High Voltage Transmission Line in the same location.

The purpose of my rebuttal is to present the potential for a wildfire event such as was encountered in the Holiday Farm Fire and identify areas of risk not accounted for in the Wildfire Mitigation Plan (WMP). The Holiday Farm Fire had multiple elements of risk, and the result was devastating; and could happen again.

Exhibit 2: 2018 Data
Oregon Wildfire Risk Explorer Tool with Holiday Farm burn perimeter overlay.



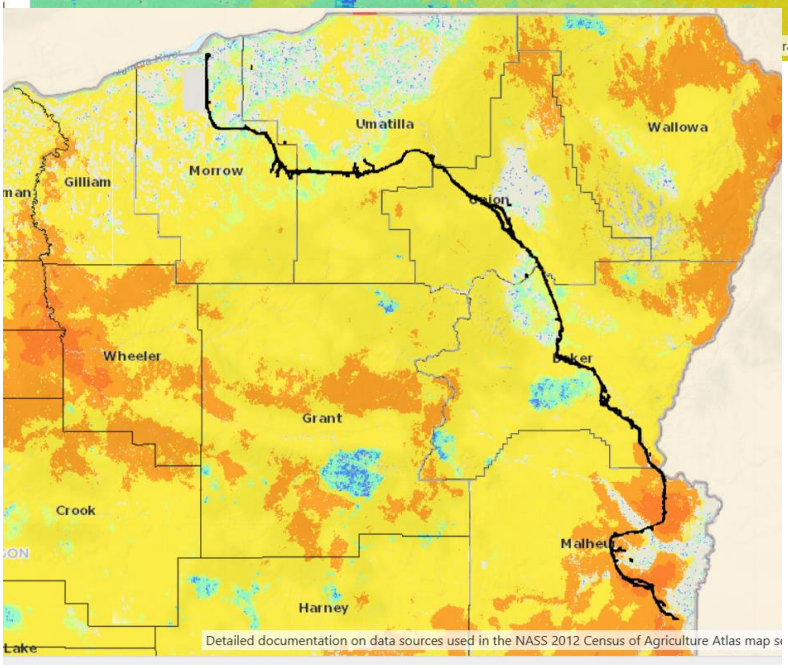


Exhibit 3:

Oregon Wildfire Risk Explorer Tool with B2H transmission line overlay. 2018 Data

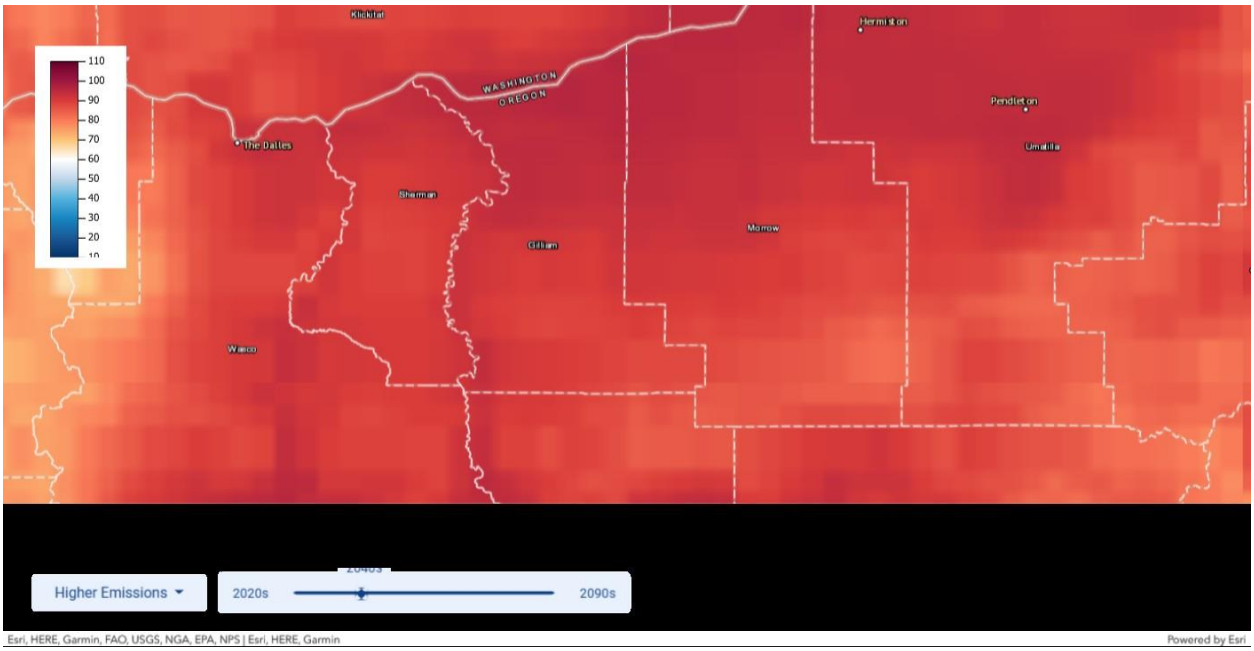
When comparing the fire risk in the McKenzie River Valley to the fire risk in the areas of the B2H transmission line, The Holiday Farm Fire ignition site (moderate to low risk as evidenced in Exhibit 2), appears less likely to burn than the path of the B2H line (Exhibit 3). The common denominators in a catastrophic wildfire are the wind and fuels. All it takes to start a fire in the dryland agriculture zones of Morrow County is a point of ignition.

Based on the windspeed records in Morrow County (Oregon Windfarms tower data), a single spark could easily become an uncontrollable wildfire. Oregon building codes are mapped for more stringent standards in northern Morrow County to withstand wind loads (State of OR Building Codes Div. 2013). B2H traverses through that windy zone. It stands to reason the reliability of the transmission line should move away from those zones and away from the even more stringent standards of Umatilla County to areas of lower winds and less risk. The notion here is: less risk, less cost. Mr. Lautenberger admits that 500kV ignitions do happen and the B2H project certainly increases the risk of a wildfire from its operations in comparison to being absent. The significance of this exposure depends on how well IPC has predicted risk sources.

In the summer of the Holiday Farm Fire, the McKenzie Valley experienced unseasonably dry and hot conditions. The conditions in Morrow County are far drier, and temperatures are only expected to rise in the coming years.

Exhibit 4: crt-climate-explorer.nemac.org

Fire Climate Map showing predicted temperatures in 2040.



The climate projection creates a concern for future atmospheric characteristics along the B2H route. Current conditions create cause enough for concern; and they will only continue to intensify. It does not appear that the rise in wildfire risk has been measured with consideration to these climate changes.

The 2023 WMP is a work in progress. My focus is toward the Exclusive Farm Use (EFU) dryland wheat areas in Morrow County and its lack of consideration in the WMP. The Fire prevention and Suppression plan and other related plans make attempts to "cover all the bases;" however, some of the risks have been completely neglected because the 2023 WMP doesn't address crop land or soil values. As a consequence, in its HCP (high performance computing), the

landowner will not receive an adequate Wildfire Risk Rating as part of IPC's Fire Potential Index (FPI).

The wildfire risk formula is located under the "Wildland" heading, (WMP2023 pg. 22) which means forest and rangeland, to the exclusion of agriculture land. IPC uses computations that don't provide a seasonal account of the landscape (or crops) using the Landfire Map tool. The tool characterizes a wheat chem fallow field as a static condition when that condition is constantly changing to the extent it becomes a fully ripened wheat field, and very flammable. Even when chem fallow is practiced and the land appears dormant, fuels continue to be very flammable. The risk increases with winds common to Morrow County, which dries out fuels even more (the average rainfall is generally 11 inches per year).

Mr. Myers' EFU land is being crossed by the transmission line and towers without accounting for the wildfire risk. Because the situational awareness FPI applies only for Idaho service area, there is no true consideration yet for the farmers and their staff working under the Transmission Line. Many analyses pertaining to the site planning have been completed, but the wildfire potential in areas of agriculture such as dryland crops in high wind zones are omitted. This element of IPC's WMP needs thorough evaluation before the PUC grants their endorsement. In addition, the risk of soil destruction and long-term production

loss by a wildfire has not been considered a consequence despite repeated testimonies to the contrary.

In addition to wind, temperature, and fuel considerations; the B2H transmission line creates additional risk of ignition. Mr. Kaseberg from Sherman County shared with me his direct experience when a Bonneville Power Administration maintenance worker sparked a fire in a field when welding. The fire was in the summer of 2002 and burned a portion of the field before its perimeter was quickly disced, preventing further spread.

Exhibit: 5

Oct. 2002 Sherman County burn area under 500kV transmission line between John Day and Buckley. Legend: Pink line indicates location of line 1 & 2.

Exhibit: 6

June 2003 Sherman County Burn area.

Photos from Google Earth (dates approximate).

Note how the burn scar remained on the land into the next season. Mr. Kaseberg now uses an Herbicide, Oust spray application twice a year to mitigate the spread of weeds from under the tower footprint, and prevent future fire; as it appears fire mitigation is not a priority for BPA. This example proves how important the line placement can be in relation to agriculture operations, especially when the Right of Way can open new pathways for public access and increased opportunity of ignition.

Based on Mr. Lautenberger's testimony, it is acceptable to compare other transmission lines to the B2H line. The Holiday Farm fire was ignited by one such transmission line, and the devastation was incredible. The region, despite experiencing a hot summer, had a significantly lower fire risk than in Morrow and Umatilla Counties. The Holiday Farm fire was spread with a high wind – while the wind along the B2H proposed line is regularly much stronger. Temperatures along the line are higher, and the tinder available for a wildfire is drier. B2H has underestimated all these factors along the proposed line. It is imperative that the PUC take notice of the lack of consideration given to the agriculture operations whose EFU fields are being crossed by the B2H transmission line. Idaho Power Company's failure to properly analyze fire risk in an agriculture setting should be a red flag warning. If the probability of ignition from the 500kV transmission lines along B2H is low, then it is surprising that no financial guarantee has been provided to landowners to back up Idaho Power Company's low-risk contention.

I hereby declare that the above statements are true to the best of my knowledge and belief, and I understand that they are made for use as evidence in administrative and court proceedings and are subject to penalty of perjury.

Dated this 20th day of March, 2023

Sincerely,

/s/*Wendy King*
Wendy King

CERTIFICATE OF MAILING

On March 2023, I certify that I filed the above Rebuttal Testimony with the Administrative Law Judge via the OPUC Filing Center, for the Docket # PCN-5.

/s/ Wendy King

Wendy King

Intervenor, PCN-5