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DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

April 17, 2023

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ATTN: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Re: Docket PCN 5 – Idaho Power Company, Petition for Certificate of Public Convenience and Necessity

To Filing Center:

The Public Utility Commission of Oregon Staff (Staff) submits for filing the enclosed errata to the Opening Testimony of Staff Witness Sudeshna Pal, Exhibit Staff/100, Pal/8. Also enclosed is a redline page with corrections identified. This errata clarifies references to the number of parcels for which condemnation may be necessary and to the associated number of landowners.

Sincerely,

/s/ Johanna M. Riemenschneider

Johanna M. Riemenschneider
Assistant Attorney General
Business Activities Section

JLM:pjr/783839745
Enclosures

1 Hemingway substation in Owyhee County, Idaho. This proposed transmission
2 line is referred to as Boardman to Hemingway or B2H.

3 The proposed route of the B2H project includes federal, state and private
4 lands. Because Idaho Power does not hold an easement for each interest in
5 private land along the proposed route, condemnation of an interest in such land
6 would be necessary in order to build and operate the transmission line. The
7 CPCN is a prerequisite for Idaho Power to initiate condemnation proceedings
8 to take an interest in private land.

9 **Q. How many parcels of land will require condemnation if Idaho Power does**
10 **not negotiate an easement interest with the respective owners?**

11 A. In Idaho Power/200/Barretto/28, the Company identified a need to acquire
12 outstanding easements from 168 landowners. In the Supplemental testimony
13 filed by Idaho Power on December 30, 2022, the Company states that it has
14 executed an additional 22 easement option agreements and identified and
15 removed 34 parcels on the landowner list that do not contain any project
16 features and hence would not require an easement option.² The Company also
17 stated that it now has a total of 51 parcels under contract, which will not require
18 condemnation.³ On the basis of this update, Staff concludes that there are (422
19 minus 22 minus 34 = 366) 366 outstanding parcels for which Idaho Power
20 would be seeking condemnation of easement interests.

² See Idaho Power/300/Barretto/5.

³ Id.

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2 line is referred to as Boardman to Hemingway or B2H.

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17 stated that it now has a total of 51 parcels under contract, which will not require
18 condemnation.³ On the basis of this update, Staff concludes that there are (~~168~~
19 422 minus 22 minus 34 = ~~112366~~) 112-366 outstanding parcels for which Idaho
20 Power would be seeking condemnation of easement interests.

² See Idaho Power/300/Barretto/5.

³ Id.

DOCKET PCN 5 - CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2023 the **ERRATA TO THE OPENING TESTIMONY OF STAFF WITNESS SUDESHNA PAL, EXHIBIT STAFF/100, PAL/8** was served by USPS First Class Mail to said person at his last known address as indicated below:

John C. Williams
P.O. Box 1384
La Grande, OR 97850

DATED this 17th day of April 2023.

/s/ Johanna Riemenschneider

Johanna Riemenschneider, OSB #990083
Sr. Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission