

November 29, 2022

Administrative Hearings Division
Public Utility Commission of Oregon
PO Box 1088
Salem, Oregon 97308-1088
Via Email: PUC.PublicComments@puc.oregon.gov

Attn: LC#78, In the matter of the Idaho Power's Integrated Resource Plan

Dear OPUC Commissioners,

This is my fourth or fifth IRP (depending on how you count the 2019 one, with 5 pauses and a fully amended second version). I am extremely frustrated, as I am sure you are; I know many in the public and intervenors are as well. I feel like we are peanuts in a shell game that Idaho Power keeps moving us around.

This time, Idaho Power has once again changed their methodologies and metrics. Now they are calculating ELCC, LOLE, forecasted load, and reliability thresholds including the cost of resource alternatives to B2H, differently than prior IRPs. As staff notes the capacity deficit that prompted the release of the company's Request For Proposals (RFP) before acknowledgement of the 2021 IRP comes from an increase in forecasted load, de-rating of the nameplate capacity of existing distributed resources, reduction in firm transmission capacity for market imports, and a recalculation of the planning reserve margin and resource ELCCs. Even before the ink even dried on the 2019 IRP, they have changed their reserve margins and claim that they now need thousands of MWs by 2026. But we are not fooled; and I doubt that you are either.

After commenting over many years about Idaho Power's:

- need for greater energy efficiency and conservation,
- about their weak and lackadaisical implementation of Advanced Metering Infrastructure (AMI) or smart grid technologies,
- their half-hearted demand response programs, which are not aggressively promoted;
- their lack of interest in any innovation that they do not fully control. By this latter I am talking about their:
 - o disincentives toward roof-top solar of their customer base;
 - o their lobbying against building codes in Idaho that would yield more energy efficient homes and businesses;
 - o their unwillingness to partner with commercial and industrial customers that can use steam-capture (aka CHP or co-gen) to produce energy on-site; and
 - o their sluggish addition of solar and battery resources in any of their portfolios.

It is becoming frustrating that the OPUC, the regulatory entity that should be watch-dogging Idaho Power, doesn't seem to have much influence either. I realize that their small Oregon customer base exempts them from a number of innovative programs that other utilities operating in Oregon must comply with. The most obvious example is the lack of participation in the Energy Trust of Oregon (where they might learn a thing or two about energy efficiency and conservation).

Regardless of this small customer base, you MUST hold their feet to the fire, because embedded in their plan is the B2H transmission line which impacts not only their customer base, but also wholesale distribution utilities (like rural coops) who buy power from the BPA, and PacifiCorps' customers in Oregon as well.

In this 2021 IRP, the biggest problem is the budget, because we are really getting down to where the rubber meets the road. We're not talking about some portfolio any longer, we are talking about an environmentally destructive project that is over a billion dollars of burden being placed on ratepayers--and we still are not *really sure* what that budgetary amount is?!

Ground has not been broken yet and you have the opportunity to "take a really hard look" before any disturbance occurs. IPC's supposed urgency or need for energy by 2026 can be filled by adding more renewable generating resources in Idaho. The bigger question, the resiliency question, does not have a timeframe does it? Back in the early 2000's when this whole process started and the company said that they would close the coal plants; they said that the transmission line was *urgently* needed by 2016. Now today, they say they need it by 2026 and they are not closing the coal plants. What are we to believe? If we are no longer talking about the "least-cost least risk" but rather resiliency, then where is that analysis, especially in the context of distributed resources, wildfire risks, and how much are we willing to pay for that--verses more secure micro-grids and storage--and by when?

The budget for the B2H has not been shared transparently with the public. It has no contingency, and has only been developed to a preliminary-level estimate. Considering that the OPUC, by law, is supposed to be evaluating the IRP and its preferred portfolio, we must have accurate figures to be able to compare the "least cost; least risk" portfolio (or plan.) This is impossible to do with shady figures!

I'm urging you, please, before accepting this 2021 IRP that you Order a re-assessment of the fiscal burdens (or the "least-cost" analysis); and within this analysis, consider the following:

1. The Mid-C energy market is entering a "resource inadequacy" period that is growing. The Idaho Public Utility Commission has said that building solar resources in Idaho, like Jackpot Solar, was less expensive over a 20-year period than purchasing energy from the mid-c energy market. With the resource inadequacy, the prices will increase, making energy transmitted over the B2H more expensive than building generating facilities closer to load.

Related, if any energy is coming back to the PNW, has there been an analysis as to what Idaho Power will charge us in return? The further the transmission, the more OATT tariffs, the more energy losses, and the more expensive -- its not rocket-science.

2. PacifiCorp has not requested that construction of the B2H be "acknowledged" in any of their IRPs. They have not signed the construction agreement with Idaho Power, nor have they been involved in any of the permitting processes or the CPCN docket (making that an incomplete petition.) This demonstrates a lack of interest in the project.

3. Are you sure that the next, best, portfolio that Idaho Power can put on the table is really more expensive than the B2H? The IPUC staff considered the high-gas, high-carbon portfolio as the *most probable* portfolio scenario due the rising costs of gas and carbon, why isn't the OPUC requiring an analysis using this future-scenario in the modeling?
4. Have all the mitigation costs from the State's Energy Facility Siting Council's site certificate conditions been included? Additionally, the litigation and cost of land acquisitions necessary? These need to be calculated and added to the cost of the B2H project before moving forward.

Will the OPUC be sure that the money is secure for the project before any additional commission acknowledgements? If you wait until the prudency review, the damage will be done. It would be a crying shame if this project were to go forward only to be abandoned leaving stranded assets, or environmental destruction and costs in its shadows, or worse putting the financial burdens on the poorest customers in the state into perpetuity.

In terms of "least-risk," the project is too destructive for the fragile eastern Oregon environment and habitats. Add the fiscal risks and wildfire risks (which I haven't addressed), and the project is just too risky!

The OPUC is mandated to consider the "least-cost, least-risk" energy plan (IRP). OPUC looks at these plans every two years because the energy industry is evolving rapidly. As Commissioner Decker likes to remind us, it's an iterative process. Hence, it's changing! So, regardless of the other state agencies and past acknowledgements, you must consider the best scenario given the current environment. To make this point, Commissioner Hardy said in LC 68:

*"Transmission must be developed with very long lead times. Because circumstances may change in the future, and new information may be presented at a later date, the ultimate development of the B2H project is not a foregone conclusion. We agree with Staff that a host of changed circumstances could require Idaho Power to reevaluate its course, including but not limited to significant changes in co-participant shares and commitments, project costs, load needs, power market liquidity and depth, and capabilities and costs of alternative technologies. **Idaho Power should be prepared for such reevaluation and to change course should such information or circumstances emerge.**" (emphasis added) [Commission Order 18-176 p. 10-11.]*

I urge you--please--look at the risk factor seriously. Ask your staff to do the necessary budgetary and technical research to assure that our rates will not be unduly impacted by a costly powerline that has other alternatives. I doubt that I am alone in saying that I would rather pay for more distributed energy resources close to load or to pay for upgrading the existing infrastructure (in Path 14) before building new. These choices also create more jobs for local residents.

The B2H project is too destructive for the environment and for our region's tourism assets! Add the fiscal risks and wildfire risks that the public is being asked to absorb, and the project is just

too risky! The comparative alternatives are more secure and position us better for a self-reliant energy future. Please make the right choice for future generations. Stop the acknowledgement of the B2H project; or at a minimum pause the process (and pause the CPN 5 process) until the company provides accurate and verifiable data and budget.

Thank You for your time and consideration,

A handwritten signature in blue ink, appearing to read "C. Fuji Kreider". The signature is fluid and cursive, with the first name "C. Fuji" and the last name "Kreider" clearly distinguishable.

C. Fuji Kreider
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