

November 29, 2022

Re: Idaho Power's 2021 Integrated Resource Plan

Administrative Hearings Division  
Public Utility Commission of Oregon  
PO Box 1088  
Salem, Oregon 97308-1088

Via Email: [PUC.PublicComments@puc.oregon.gov](mailto:PUC.PublicComments@puc.oregon.gov)  
Attn: LC#78

Dear OPUC Commissioners,

I am writing to urge you to NOT acknowledge IPC's 2021 Integrated Resource Plan. IPC has had years to get this right and still cannot demonstrate how their budget pencils out. One aspect of this is that PacifiCorp has not requested that construction of the B2H be "acknowledged" in their 2021 IRP. They have NOT signed the construction agreement with Idaho Power, they did NOT participate in the EFSC process, and are NOT involved in the CPCN docket. That makes this an incomplete petition. This demonstrates a lack of interest in the project.

Idaho Power's acknowledgement to construct the B2H should be put on hold until PacifiCorp, IPC's putative partner (and only remaining one) in this proposed project, asks for acknowledgement to construct the B2H, signs the construction agreement, and a full transparent budget with contingencies, revenue requirements and EFSC mitigation costs is shared with the public.

In addition, this project is too destructive for the fragile eastern Oregon environment and habitats. It plows right through the #1 WUI in Union County (near Morgan Lake Park)—endangering residents in an area that suffered a devastating fire in 1973; cruises right past the big picture windows at the NHOTIC; and blasts through some of the last existing sage grouse habitat. This IRP should not be acknowledged unless and until IPC can conclusively demonstrate the need and the "least-cost, least-risk" scenario to Oregon's PUC.

Thank you for your time and consideration,

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As to Chair Decker's comments, has IPC really adjusted to "changed circumstances" when they have