

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC-70

In the matter of		
		GAIL CARBIENER'S
PACIFICORP d/b/a PACIFIC POWER		INITIAL COMMENTS
<u>2019 Integrated Resource Plan</u>		2/8/2020

I appreciate the Utility Commission including me as an intervenor in PacifiCorp's IRP. As a member of the general public and not a technical individual, I want to thank the Staff and especially PacifiCorp for their responses to the IRP.

It is no secret that I am opposed to the Boardman to Hemingway Transmission project. For many reasons including damage to the Oregon Trail, Wildfire concerns, and lack of need. This LC-70 seems to confirm my concern for need. The Sierra Club and NW Energy Coalition plus Staff are the only ones to even discuss transmission and B2H in any detail.

NW Energy Coalition certainly questions the B2H. Several of their comments reinforce previous comments I have made to Idaho Power. They state; *"An important question still on the table is whether careful portfolio development and sequencing of new renewable acquisition, coal retirement and enhanced demand side management can defer or avoid new transmission builds."*

The Sierra Club in their response states; *"The Company is asking the Commission to approve billions of dollars in transmission projects on the basis of the possibility that PacifiCorp might develop generation resources that would require those transmission projects."*

I understand PacifiCorp's comment where they say; *"as a participant in the permitting phase of the project, PacifiCorp cannot control the in-service date."* But I do not understand why the commission does not require PacifiCorp, as a 54%, owner to prove they need the B2H. So, what am I missing if Idaho Power obtains acknowledgment with 79% not funded by PAC and BPL?

"The funders have not yet entered into construction and operating agreements, but they commenced negotiations on those agreements following the Oregon Department of Energy's Draft Proposed Order on May 22, 2019. Per the Amended and Restated Joint Funding Agreement, the funders are allotted up to two 120-day negotiation periods to finalize the construction and operating agreements." Idaho Power Company, 2019 Integrated Resource Plan, Appendix D. Seems to me this 8 month period has passed.

In PAC reply comments, they respond to Staff and others; *"the 2019 IRP evaluated additional Energy Gateway transmission segments, and while there is potential for future investments in the transmission system, the company found these segments to be uneconomic at this time."* I read this as saying they may be delaying or postponing the request for acknowledgment of B2H in this 2 – 4 year action plan. No where in the PacifiCorp IRP discussion of Transmission, do they say B2H is needed for

energy or capacity. Idaho Power's 2019 IRP identifies the Boardman-to-Hemingway transmission line (B2H) as a preferred resource to meet its capacity needs, reflecting a need for the project in 2026 to avoid a deficit in load-serving capability in peak-load periods.

CONCLUSION

1. Commission should acknowledge PacifiCorp's IRP Transmission action projects.
2. Commission should acknowledge PacifiCorp's B2H action as continued funding as per the funding agreement, but specifically require any construction agreement to be approved.

Thank you for consideration of my comments.



A handwritten signature in cursive script, reading "Gail Carbiener", is enclosed within a thin black rectangular border.

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