



"Protect Our Land, Preserve Our Heritage"

STOP B2H Coalition

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March 19, 2021

Oregon Public Utility Commission
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Dear Commission,

Please accept the enclosed Reply Comments from the Stop B2H Coalition pertaining to the OPUC Staff Report on Idaho Power Company's Second Amended 2019 IRP.

If you have any questions, please do not hesitate to contact me.

Thank You,

A handwritten signature in blue ink, appearing to read "Jim K..." with a stylized flourish at the end.

Co-Chair, Stop B2H Coalition

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541-406-0936

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

**In the Matter of
Idaho Power Company

Second Amended 2019
Integrated Resource Plan**

Docket LC 74

**STOP B2H Coalition
Reply Comments to
Staff Report**

Submitted
March 19, 2021

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Introduction

The Stop B2H Coalition, a non-profit coalition of nearly 900 individuals and 8 member organizations, representing thousands of additional individuals, respectfully submits these brief comments in response to the OPUC staff report on Idaho Power’s 2nd Amended 2019 IRP.

STOP appreciates staff’s efforts, thoughtful data requests, and recommendations regarding the Boardman to Hemingway (B2H) analysis within this IRP. There are several items we would like the staff and Commission to consider or re-consider. These are presented below in the following nine sections.

1. Boardman to Hemingway (B2H)

STOP would like to open our comments in this section by sharing the Idaho Public Utility Commission’s Final Order 34959 in Idaho Power’s 2nd Amended 2019 IRP issued March 16, 2021 addressing B2H. They open saying:

“b. Boardman to Hemingway

Staff expressed several concerns with Idaho Power’s B2H analysis. Staff Comments at 8 – 11. First, Staff noted the analysis was conducted using WECC-optimized portfolios. Id. at 8. Second, Staff stated the analysis made “overly optimistic assumptions about the availability of power in the Pacific Northwest for import into Idaho Power’s system.” Id. Staff noted that Idaho Power did not evaluate the potential impacts of Washington’s Clean Energy Transformation Act (“CETA”) on the energy available for export from Boardman to Idaho Power’s system. Id. at 9. Third, Staff stated Idaho

Power did not analyze the substantially increased ownership share in B2H that Idaho Power is contemplating as its potential partners in the transmission line, PacifiCorp and BPA, explore alternatives. Id. at 8. Staff stated that BPA excluded B2H from the 2020 BPA Transmission Plan, which describes BPA's ten-year system expansion and reinforcement plans. Further, PacifiCorp's 2019 IRP described B2H as "an alternative to PacifiCorp's originally proposed transmission segment from Eastern Idaho into Southern Oregon." Id. at 10 citing PacifiCorp 2019 IRP at 83.

Staff also stated Idaho Power's inadequate B2H investment evaluation left three areas of risk. First, Staff stated, "Forecasting future market prices for a capacity resource that has not been identified, and may not exist, is not a reliable method for evaluating costs associated with the B2H line." Id. at 9. Second, competition from other regional utilities looking for capacity resources will affect regional resource adequacy. Id. Third, neighboring states' clean energy policies will constrain capacity resource options. Id. at 9 – 10. Staff also stated that Idaho Power's 2019 IRP did not analyze a potential additional 24 percent ownership share (that coincides with BPA's ownership share) even though Idaho Power disclosed to the Securities and Exchange Commission that it was investigating a "hypothetical 45% ownership." Id. at 10 citing SEC Form 8-K. Staff stated that BPA has advanced policies that "build at the smallest scale possible to meet customer needs." Id. at 11 citing Department of Energy, BPA Executive letter from Elliot Mainzer to parties interested in the I-5 Corridor Reinforcement Project. Staff recommended Idaho Power provide a detailed analysis of 45 percent and 100 percent ownership shares of B2H during the next IRP cycle. Id. at 11. Staff asserted there would be potential tax implications if Idaho Power took on additional B2H ownership. Id. Staff also noted that Idaho Power proposes using B2H, a project estimated to cost \$1 billion to \$1.2 billion, with a 21 percent ownership share at \$292 million, to fill a 5 MW capacity deficiency in August 2029. Id."¹

STOP continues to question the prudence of acknowledging construction activities to continue when there are so many loose ends. When the project does not get built we hope the Commission will not allow these imprudent costs to be passed onto rate payers.

2. Robust Energy Market Analysis

STOP would like to recommend that a more robust energy market analysis be done. The Mid-C is not the only market IPC has access to.

The company has market purchase choices in major market hubs like California–Oregon Border (COB), Four Corners (Arizona–New Mexico border), Mead (Nevada), Mona (Utah), Palo Verde (Arizona), and SP15 (California). These markets have not been analyzed or compared to the Mid-C in a comprehensive way. The company should be requested to analyze these markets and compare them to the Mid-C in a comprehensive and understandable way.

Additionally, if Wyoming wind is being evaluated to come to Oregon it must move through Idaho on Gateway West. It is curious how IPC's assessment of Wyoming wind LCOE (\$1,755) is higher than the

¹ IPUC Final Order 34959 in Idaho Power's 2nd Amended 2019 IRP issued March 16, 2021, pp. 9-10.

top range Lazard estimation (\$1,500). It is very puzzling why none of that energy is purchased by Idaho power to meet its need?

3. Bridger Units

STOP would like to point out that the preferred manually optimized portfolio is based on certain Bridger exit dates. Those dates determine Idaho Power capacity deficiency of 5 MW in August 2029². IPC stated that it has no contractual mechanism with PacifiCorp to pursue early exit and is working with PacifiCorp to determine the costs and details of exiting Jim Bridger³.

A key data point in the calculation of the preferred manually optimized portfolio (i.e.: the exit date) is squishy; and at best, a hoped for range of dates. Therefore the ability to analyze and compare portfolios is severely compromised. Add to this: the shared concern (staff and Sierra Club) about consistency between the Idaho Power and PacifiCorps' different O&M cost assumptions since they are different, as well as, a lack of a secure plan for early retirement coordination. Sierra Club is also concerned that PacifiCorp's application to the State of Wyoming for a Regional Haze Reassessment could provide an alternative to SRC installation on Units 1 and 2 allowing them to operate until 2034 and PacifiCorp's delayed retirement of Jim Bridger could be to protect the utility in Wyoming, a state opposed to the closure of non-economic coal plants. Hence, STOP recommends, similar to the 2017 IRP, that the Commission not acknowledge the retirement dates of the Bridger units until the above is known with much more certainty.

4. Security and Exchange Commission (SEC) Updates

STOP requests that the Commission ask Idaho Power to include the SEC Annual Reports' information relevant to the B2H in all future IRP's and provide the most recent quarterly update 4 weeks before final comments are due. We have seen in this IRP that what is shared with investors is different than what is shared with the Commission.

5. Transmission Workshop

STOP recommends that Idaho Power present a transmission workshop on B2H and Gateway West in the same manner that PacifiCorp did on February 11, 2021 to the Commission. The topic should include a full non-wires assessment, including the potential system benefits and the full set of commercial arrangements with PacifiCorp and the Bonneville Power Administration concerning Boardman to Hemingway. The same could be done on Gateway West's shared ownership and capacity and the role Wyoming wind might play in the relationship.

² IPC Final Order 34959 p. 10.

³ IPUC order No. 34949 Idaho Power reply p. 19.

6. Opportunities to Reduce Real Power Losses Should be Evaluated as Both a Supply Side and a Demand Side Resource

In staff's final comments they unknowingly let Idaho Power's misleading reply comment reframe STOP's opening comments on real power loss considerations; and as a result, the Staff Report misrepresents STOP's Opening Comment on real power losses. Nowhere in STOP's opening comments did STOP criticize the B2H transmission line directly on the issue of line losses.

STOP did provide Opening Comments on the general issue of real power losses in the context of Integrated Resource Planning best practices, consistent with generally accepted norms of integrated resource planning.

In Opening Comments, STOP advocated that Idaho Power evaluate resource options in the 2019 IRP that would recognize and identify future resource actions that would create significant capacity value by reducing real power losses during peak system conditions. Once again, this was done without reference to B2H.

STOP stands by its comments on the record addressing the significant portfolio benefits of resource actions that can substantially reduce real power losses during peak system conditions, especially recognizing the large benefits of demand response in reducing peak system real power losses. For this reason, we repeat below STOP's verbatim introductory comments on real power losses in STOP's Opening Comments for this Commission's consideration.

Below are the opening paragraphs of STOP's introductory comments on real power losses from STOP's Opening Comments on this Second Revised 2019 IRP (LC74 IPC Amended 2019 IRP, April 6, 2020.)

Idaho Power Should Evaluate Real Power Loss Reductions as a Supply Side Resource

Transmission losses (Lost and Unaccounted For) Energy is the single biggest consumer of energy within the Idaho Power System and Idaho Power wastes considerably more energy as a percentage of load than other utilities. In 2018, annual transmission system losses in the Idaho Power BAA averaged 7.3% over the year compared to PacifiCorp's average hourly transmission losses of 5.5% and PGE's average transmission losses of only 3%.

Idaho Power's actual average annual loss factor of 7.2% means that transmission losses on Idaho's peak hours exceed 10%, or more than 400 MW. Losses are a function of the location of generation relative to the load served. Dispatching a resource close to load incurs minimal transmission losses, while dispatching a distant resource to serve the same load can incur a large penalty in the form of high transmission losses. For example, a decision by Idaho Power to turn off Idaho Power's Langley Gulch generating plant and instead buy 300 MW from MIDC on a peak summer day will result in 15% or higher incremental transmission losses (i.e., 45 MW or more of incremental losses). This means that the regional power system must generate 345 MW of power to replace the 300 MW of power that would otherwise have been generated by Langley Gulch on that hour.

*Idaho Power is aware of the costly impact of these long-distance market purchase transactions due to their disproportionate impact on real power losses yet **has ignored the consideration of these losses in their IRPs**⁴. (emphasis added)*

Demand Response measures, which by definition are located at the load, can result in real power loss reductions of 15 percent or more during peak system conditions, similar to choices to buy distant power instead of dispatching a resource in Idaho or dispatching demand response measures. Despite this large capacity benefit of demand response measures, Idaho Power does not credibly consider real power loss reductions when estimating the levelized cost of demand response measures, resulting in an overestimate of the true cost of demand response measures.

STOP reiterates its recommendation in STOP's opening comments that this Commission should consider asking Idaho Power to consider a full range of real power loss reduction opportunities in Integrated Resource Planning. STOP would ask this Commission to direct Idaho Power to consider the benefits of real power loss reductions as a supply side resource in the 2021 IRP.

7. Oregon Residential Time-of-Day Pilot Plan

STOP appreciates staff's identification that Idaho Power's modeling of this program is based on \$60 per KW year LCOC for expanded DR, which is unrealistic for behavior-based programs that do not include hardware costs. In IPC's explanation⁵ of their program design they include a customer awareness campaign that sent postcards and created a rate comparison tool that is available on the customers' My Account.

With a pricing and marketing campaign as described, how can one be surprised that only 3 customers signed-up? The program is not succeeding. Therefore, we ask that the Commission and staff ensure that this program design is included in the company's review of all energy efficiency measures piloted by Energy Trust in 2018-2020 as recommended by staff.

8. Carbon Risk/Climate Change Risk Report

We ask that the staff review and verify STOP's analysis of the data. We stated, "... Idaho Power is projecting that in 2025, carbon emissions from their system will be 10.46% higher under their [P]referred Portfolio than they are today and will not even start to decline below today's level until 2029," due to the increased reliance on purchased power in-lieu of acquiring low-carbon resources. This is an egregious

⁴ LC-74 STOP Coalition Opening Comments on Second Revised 2019 IRP p. 16. (LC74 IPC Amended 2019 IRP, April 6, 2020.)

⁵ The intent of the TOD Pilot Plan was to introduce an optional pricing offering for Oregon residential customers that include a seasonal and time-differentiated rate design reflective of the cost to serve. Following Commission approval to implement the plan, Idaho Power marketed the program with postcard mailers and also created a rate comparison tool that is available on My Account. To date, there are three customers participating in the TOD Pilot Plan.

blemish on Governor Brown's Executive Order 20-04 on Green House Emissions. Unfortunately, the current IRP guidelines do not require stochastic analysis for measuring carbon cost risk⁶.

We look forward to participating in:

- staff's proposed series of workshops in 2021 to explore additional, and in some cases more granular portfolio emissions data in response to EO 20-04; and
- the company's Climate Change Risk Report for the 2021 IRP to comply with Order 18-176 as recommended by staff.

We ask Idaho Power to think boldly and calculate the amount of energy that could be produced if solar and batteries were installed on all appropriate residential/commercial/industrial buildings in the most productive solar PV zones in its service territory.

IPC is looking for the Mid-C to supply their clean energy goals while taking very little responsibility to build out clean energy resources for their own system. This is demonstrated by the company not including any new DER or renewable assets until 2030 while carbon emissions increase through the late 2020's.

9. Site Certificate-500 kV versus 21 Percent Capacity Share

In STOP's Final Comments on this Second Revised 2019 IRP, STOP asked the Commission to clarify in its pending Order that the 2017 IRP acknowledged Idaho Power's 21 percent capacity share of the B2H line and did not acknowledge the capacity shares of PacifiCorp and Bonneville Power. Despite the specific nature of STOP's request, Staff did not summarize STOP's position in their Staff Report, and merely acknowledged Idaho Power's plea to reject STOP's position as follows:

"Regarding the EFSC capacity and siting issue, Idaho Power stated that "it would be impossible for Idaho Power to utilize a 21 percent share of B2H unless 100 percent of the line is built,"³⁰ and that the Oregon Commission should reject STOP B2H's interpretation that the Commission's 2017 acknowledgment order only accounted for 21 percent of the line." (Staff Report p 17)

STOP would like to clarify and explain STOP's actual position as stated in STOP's Final Comments and provide an historical context and explanation for those comments; providing context and explanatory details that were not picked up in the Staff Report. As the Commission Chair may remember, in the 2017 IRP Staff Report, it stated the following:

As a point of clarification, before Idaho Power can begin construction on B2H, it must obtain a Site Certificate from EFSC. The process requires a route to be selected and fully evaluated to determine if the project meets established standards. Idaho Power must also demonstrate a "need" for the project before EFSC will issue a Site Certificate. Idaho Power can demonstrate "need" if the Oregon Commission acknowledges B2H in the IRP, which makes the 2017 B2H Acknowledgment a significant decision.⁷

In the April 10, 2018 Public Meeting, STOP questioned Staff's interpretation of EFSC rules as expressed in the Staff Report, and explained to the Commission that EFSC rules state that the applicant for a site

⁶ OPUC Staff Report, March 5, 2021, p. 30.

⁷ LC-68 2017 Staff Report p. 9.

certificate for a transmission line under the Least-Cost Plan Rule must submit an energy resource plan or a combination of plans that add up to the capacity of the proposed transmission line.

*“The Council shall find that the applicant **has demonstrated need for the facility if the capacity of the proposed facility** (emphasis added) ...is identified for acquisition in the short-term plan of action of an energy resource plan or **combination of plans** (emphasis added) adopted, approved or acknowledged by a municipal utility, people’s utility district, electrical cooperative, other governmental body that makes or implements energy policy, or electric transmission system operator that has a governance that is independent of owners and users of the system... [OAR 345-023-0020](#).*

In response, this Commission made clear in the subsequent Order the Commission’s intentions by stating the following in the opening paragraph of the Order:

“Although our acknowledgement includes Idaho Power's Boardman to Hemingway (B2H) related action items, we note that our acknowledgement is limited to our interpretation of IRP standards specific to the Public Utility Commission, and does not interpret or apply the standard of any other state or federal agency.”⁸

Again, on page 9 of the Order, this Commission stated:

“We clarify that this determination is limited to our IRP standards and that, in acknowledging these action items, we do not interpret or apply the standards of any other state or federal agency”.

Despite this clear explanation by this Commission, Idaho Power proceeded to submit an application for a B2H site certificate to EFSC claiming that this Commission had determined through its acknowledgement of the 2017 IRP that B2H had met EFSC’s Need Standard.

*Under OAR 345-023-0020(2), the Council shall find IPC has demonstrated the Project need if the capacity of the Project or a facility substantially similar to the Project is identified for acquisition in the short-term plan of action of an Integrated Resource Plan (IRP) acknowledged by the Oregon Public Utility Commission (OPUC). **Here, the development of the Project has been acknowledged by the OPUC in the 2009, 2011, 2013, 2015, and 2017 IRPs (Attachments N-1, N-2, N-3, N-4, and N-5; see Section 3.2.2.3 below). Therefore, EFSC must find that the need standard has been satisfied.*** (emphasis added).⁹

On May 22, 2019, EFSC issued its Draft Proposed Order stating that:

*Therefore, the Department [ODOE] points the Council to the language of the standard and that because OAR 345-023-0020(2) has been met, “The Council shall find that a least-cost plan meets the criteria of an energy resource plan described in section (1) if the Public Utility Commission of Oregon has acknowledged the least cost plan,” that the applicant has demonstrated the need for the facility under OAR 345-023- 0005(1), **and the Council must find that the Need Standard has been met** (Emphasis Added).¹⁰*

⁸ Order 18-176 p. 1.

⁹ Application for Site Certificate, Exhibit N p. N-5.

¹⁰ Boardman to Hemingway Transmission Line Application for Site Certificate Draft Proposed Order, May 22, 2019 p. 524.

On August 22, 2019 STOP filed comments with EFSC on the Draft Proposed Order pointing out that the clear language of the 2017 IRP showed that the Commission had acknowledged only Idaho Power's 21 percent capacity share of the B2H transmission line, and the Commission had not acknowledged the remaining 79 percent capacity shares reserved to Bonneville Power and PacifiCorp.

On July 2, 2020, ODOE issued its final Proposed Order in which the Dept. of Energy changed its earlier decision that this Commission had determined that its acknowledgement of the 2017 IRP met EFSC's need standard. Instead the dept concluded that this Commission had acknowledged a transmission line with a capacity of 500 kilovolts, despite and that the fact that the 2017 IRP only requested acknowledgement of Idaho Power's 21 percent share was irrelevant to EFSC's deliberations.

STOP understood that the clear language of the 2017 IRP showed otherwise and proceeded to request this issue be included in the B2H Contested Case at EFSC. STOP saw no need for this Commission to be petitioned to explain the 2017 IRP at that time, or otherwise be involved in the EFSC process and intended to proceed in the contested case by allowing the clear language in Idaho Power's 2017 IRP to stand on its own.

Idaho Power clearly had different plans and petitioned this Commission to insert itself into the EFSC contested case when on October 2, 2020, Idaho Power submitted their Second Revised 2017 IRP with the following plea to the Commission:

*"Idaho Power intends to work with OPUC Staff and intervening parties to develop a schedule in this case that allows for a Commission decision by February 26, 2021. This proposed review period should be adequate given the scrutiny already given the Amended 2019 IRP, the robustness of the IRP review process by Idaho Power, and the fact that the changes to the conclusions and actions contained in this second amendment are relatively modest. **A decision by February of 2021 is important to the Company for two reasons. The contested case process for a site certificate for B2H is currently ongoing before the Energy Facility Siting Council. A timely decision in this IRP proceeding will provide invaluable context for the EFSC proceeding by further clarifying the Company's need to develop this important project.** (emphasis added) Moreover, an expeditious conclusion of this IRP will position the Company to begin engaging with stakeholders on the 2021 IRP, with a goal of filing that IRP in the latter part of 2021."*¹¹

Despite the concerning nature of this request from STOP's view, STOP sought understanding of Idaho Power's intentions and submitted the following data request to IPC on November 18, 2020.

STOP B2H'S DATA REQUEST NO. 105:

In Idaho Power's cover letter delivering the Second Revised 2019 IRP to the OPUC in this docket, Idaho Power implores the Commission to expedite the approval of this Second Revised IRP with the following statement:

"A decision by February of 2021 is important to the Company for two reasons. The contested case process for a site certificate for B2H is currently ongoing before the Energy Facility Siting Council. A timely decision in this IRP proceeding will provide invaluable context for the EFSC proceeding by further clarifying the Company's need to develop this important project." (See October 2 filing of second amended IRP at page 2.)

Please identify specifically in this IRP what "clarifying information" Idaho Power intends to use in the EFSC contested case process. Please cite specific language in this 2019 Second Revised IRP and why it will provide "invaluable context" for the EFSC proceeding.

¹¹ LC-74 Idaho Power's Amended Application p 2

For each specific element of “clarifying information” identified above, please address the following in your response.

- 1. Is this information element new to the Second Amended 2019 IRP, or was this information element contained in the final 2017 IRP?*
- 2. If the substance of this information element was included in the 2017 IRP, please explain why it was unclear in the 2017 IRP, and how this information element has been specifically clarified in the Second Amended 2019 IRP.*

Idaho Power merely brushed aside STOP’s data request with the following response.

IDAHO POWER COMPANY’S RESPONSE TO STOP B2H’S DATA REQUEST NO. 105:

Idaho Power objects that the information sought is no longer relevant to any issue in this IRP docket, given that a schedule has been agreed upon by the parties. Without waiving this objection, Idaho Power offers the following information:

Like the 2017 IRP, the 2019 IRP has continued to evaluate B2H and has determined that B2H is a component of its least cost/least risk portfolio (Preferred Portfolio). In addition, the Short-Term Action Plan for the 2019 IRP includes action items specific to the continued permitting and construction of B2H. While it is true that Idaho Power’s EFSC application appropriately relies on the Commission’s acknowledgement of its Short-Term Action Plan’s items regarding B2H to demonstrate the need for B2H, Idaho Power believes that the Commission’s acknowledgement of the B2H action items in the 2019 IRP will be of interest to EFSC.

STOP remains uncomfortable that Idaho Power has asked the Commission to expedite the acknowledgement of this IRP, on the basis that this IRP contains “clarifying information” that “will be of interest to EFSC.” STOP does not know what this clarifying information is, but STOP does note that Idaho Power has replaced most references to “participant capacity shares” in the 2017 IRP with the new term “participant permitting shares” and/or “participant shares of permitting costs.” We also note that the 2019 IRP emphasizes that B2H is a 500 kV transmission line, while removing many references to the capacity of the transmission line, and how the capacity is allocated to participants, as compared to the 2017 IRP.

STOP apologizes for requesting this Commission to clarify that their acknowledgement in the 2017 IRP was for Idaho Power’s 21 percent share of B2H capacity and not for PacifiCorp’s 55 percent share. STOP asks because of Idaho Power’s evasiveness and attempt to finesse the system to its advantage. STOP feels compelled to do so.

Conclusion

STOP appreciates the efforts everyone put into this marathon IRP. It has been a learning experience for all and we will continue to make our informed efforts as effective as possible for the 2021 IRP. As expressed above STOP is concerned with the squishiness of many of the data points that inform critical calculations between the inter-relationships of the elements of this IRP.

We do not know what the preferred portfolio really is in this IRP? The company tells us what they believe but staff points-out in their analysis the variability and favorability of other portfolios in different cases. Which one is best – we do not know?

Will the Bridger units exit at the anticipated times, or years later? Is Idaho Power's risky strategy of a creating a transmission line into the Mid-C market as it begins to experience a resource inadequacy prudent when it hasn't seriously explored the other markets around it?

Will the reluctant partners sign-on or walk away to create their own solutions to this issue because the B2H does not meet their needs as they might have other solutions? This degree of uncertainty should require a contingency fund greater than the 20% contemplated. Huge projects like this always have cost overruns and surprises and they are usually not in favor of the builder. Plus, the project's budget has not changed since inception, around 2010.

Finally, Idaho Power's carbon trajectory is going in the wrong direction. It is growing rather than shrinking. Their strategy of buying "green energy" from the Mid-C to achieve their green energy goals, while doing nothing until 2030 to enhance their own renewable fleet, speaks to their intentions. Buy not build.

If this IRP is acknowledged the Commission should inform Idaho Power of Oregon's green energy vision and climate agenda. We as a state are doing the heavy lifting to create a green energy economy (e.g.: HB 2021); and we do not want a "freeloader" taking all of our green energy while not doing any of the hard work necessary to build their own.

Stop urges the Commission to not accept Idaho Power's 2019 IRP. It has been noted by both the Oregon and Idaho dockets that IPC did not perform the studies committed to in 2017 for the 2019 IRP. This type of behavior should not be allowed to continue.

Finally, as our comments would not be complete without it: We urge the Commission to stop acknowledging the B2H as we are concerned that more investments are no longer prudent.

/s/ Jim Kreider