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IDAHO PUBLIC
UTILITIES COMMISSION

January 22, 2020

VIA EMAIL

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-19-19
Accidental omission of my signature on 1-20-21 STOP B2H Coalition filing

Dear Ms. Noriyuki:

Please add the attached signed signature page to the filing I submitted on January 20, 2021. The omission of my signature on the document was an oversight.

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

Sincerely,

/s/ Jack Van Valkenburgh
Jack Van Valkenburgh
Attorney at Law

Attachment

In summary, STOP has identified many errors and misstatements by Idaho Power in this Second Amended 2019 IRP. Most importantly, Idaho Power has under-represented the level of existing transmission capacities in its Aurora model runs. The utility is, in fact, holding more CMB in reserve than needed, creating significant modeling bias in favor of the B2H transmission line. If this bias were corrected, B2H would likely not be the least cost/least risk portfolio.

The Commission should not acknowledge the Second Amended 2019 IRP as it stands and, at a minimum, should pause continued permitting and construction of the B2H until partners are signed and a solid budget developed. That is the only reasonable path to a least cost/least risk portfolio, one developed with full confidence in the underlying criteria.

Respectfully submitted this 20th day of January, 2021

/s/ Jack Van Valkenburgh
Jack Van Valkenburgh
Attorney for STOP B2H Coalition
(signature provided on 1/22/21)