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IDAHO PUBLIC UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE)
APPLICATION OF IDAHO POWER)
COMPANY FOR AN ACCOUNTING)
ORDER AUTHORIZING THE)
DEFERRAL OF INCREMENTAL)
WILDFIRE MITIGATION AND)
INSURANCE COSTS.)**

CASE NO. IPC-E-21-02

IDAHO CONSERVATION LEAGUE

COMMENTS

The Idaho Conservation League (ICL) recommends the Commission approve Idaho Power’s Application with slight modification. We have read the Application as well as the Wildfire Mitigation Plan itself and believe that this Plan is a necessary step for Idaho Power to prepare for the impacts of climate change within its management and operations.

Overall, ICL supports Idaho Power’s Wildfire Mitigation Plan. We believe that this Plan takes a proactive, pragmatic approach to prepare for and to mitigate fires in the Idaho Power service area. While Idaho Power currently plans to operate its wildfire practices independently, we recommend that Idaho Power instead include collaboration with these land management agencies as a major component of its Wildfire Mitigation Plan.

Accounting for Climate Change

Idaho Power recognizes that climate change is directly impacting their operations. In the Application, Idaho Power acknowledges they have “observed several climate-related shifts that increase wildfire risk” and that “more broadly, climate change is fundamentally altering the way trees and forests work”. *IPC Application at 11*. In light of the climatic changes occurring in the region, Idaho Power wants to adequately reduce wildfire risk associated with the operations and management in their service area. This Wildfire Mitigation Plan is a good example in making proactive changes to prevent an incident instead of retroactively mitigating after the incident has occurred. ICL appreciates and commends this protective approach to environmental management.

ICL believes that accounting and planning for the costs of climate change ahead of time is likely to lead to less cost than mitigating the results of climate change after the fact. The

preparation on Idaho Power's part shows that they are committed to providing their customers with safe, adequate, and reliable power. This Plan also reveals that Idaho Power is committed to the adequate stewardship of resources associated with their service area and transmission and distribution area as a whole. ICL appreciates this commitment.

Land Management Agency Collaboration

The foundation for the Wildfire Mitigation Plan, according to Idaho Power, is to maintain safety and reliable electricity delivery for customers as well as good stewardship of the landscape. *IPC Application at 3*. Idaho Power states that they value their good stewardship within and beyond their designated service area. In order to achieve the best stewardship of the landscape and natural resources, ICL recommends Idaho Power amend the Wildfire Mitigation Plan to include more specific collaboration between the land management agencies such as the Forest Service and the Bureau of Land Management (BLM), who are responsible for the lands over which Idaho Power's infrastructure extends.

Much of Idaho Power's infrastructure crosses public lands managed by the U.S. Forest Service, Bureau of Land Management, and other federal and state agencies. All these land managers have wildfire assessment and mitigation plans. Idaho Power's Plan does not discuss how the Company will coordinate with these land managers to align activities and spending. Throughout its Wildfire Mitigation Plan, Idaho Power only states that it plans to concede to local, state, and federal land management agencies if they issue a formal decision regarding wildfire restrictions and waivers. Beyond supporting these land managers' authority, Idaho Power should proactively collaborate in ongoing management planning processes to ensure the complexities of landscape management in the face of wildfires are being addressed by all stakeholders in a coordinated manner. Partnering with land managers and other stakeholders to coordinate wildfire mitigation activities can enable Idaho Power to leverage utility investments with other planned public spending to improve wildfire resilience across the entire landscape, not just within the Idaho Power service area.

Wildfires do not recognize boundaries. Independent wildfire management and fuel reduction efforts that are compartmentalized within different land ownerships are not nearly as effective as more comprehensive, coordinated efforts spanning multiple ownerships on a

landscape scale. Working proactively across ownerships can be a more efficient use of planning efforts and leveraging resources once they are mobilized on the ground. For example, if Idaho Power timed its own fuel reductions within its rights of way with adjacent efforts, these efforts would likely be far more effective.

The Forest Service and State of Idaho are working under the Shared Stewardship Agreement in which both agencies have agreed on an “all hands, all lands” approach. The Forest Service and State are seeking additional partnerships with private property owners and others on a landscape-scale approach in which the federal and state funds could be used for hazardous fuel reduction treatments on other properties. To assist with the implementation of the Shared Stewardship Agreement, the Governor has convened a Shared Stewardship Advisory Group. Members include the State Fire Marshal, Forest Service and Department of Lands representatives, among others. Temporary Ad Hoc members from utilities, insurance companies, and others may be appointed as needed to provide technical expertise. The Idaho Shared Stewardship Coordinator is Ara Andrea, who can be contacted at 208-666-8624 or aandrea@idl.idaho.gov. We recommend contacting Ara to see how Idaho Power’s might be able to coordinate its Wildfire Mitigation Plan with various Shared Stewardship efforts.

In addition, each National Forest in Idaho has a five-year plan for forest management projects. Many of these projects have a goal of making forests and watersheds more resilient to wildfires through thinning and prescribed burning. Each National Forest also has an independent local forest restoration collaborative which makes recommendations for forest restoration activities. These collaboratives are formed by diverse stakeholders including county governments, forest product industry representatives, conservation groups, sportsmen, recreationists, ranchers, and others. In National Forests where Idaho Power has rights of way with upcoming maintenance needs, we recommend that Idaho Power give a presentation to the collaborative and Forest Service about the Wildfire Mitigation Program, learn about the five-year plan, and develop a formal cooperative approach to wildfire mitigation with these land managers. At a minimum an Idaho Power representative should participate in the monthly collaborative meetings to develop forest restoration recommendations. The Idaho Forest Restoration Partnership is a statewide support group for these collaboratives and has the contact information for each collaborative.

We also recommend coordinating with the BLM to see if there are any cheatgrass management or ecologically-sound fuel reduction projects planned in the vicinity of Idaho Power rights of way. The BLM is currently analyzing and implementing a number of fuel breaks and cheatgrass management programs in an effort to preserve intact sage steppe habitats and reduce wildfire risk. Since powerline corridors are disturbed habitat, they are susceptible to invasion by cheatgrass which elevates the fire risk for both the right of way and the surrounding rangelands. Because range fires can move very quickly and cover great distances, we believe that a coordinated cheatgrass reduction program on a larger area would be far more beneficial than focusing treatments solely within the rights of way. Coordinating with the BLM could also help improve recreation management issues, reduce improper target shooting and reduce the risk of human-caused wildfires. By working with the BLM to address these issues both within and surrounding the rights of way, Idaho Power has a greater likelihood of success in reducing wildfires. We also recommend working with the BLM and Rangeland Fire Protection Associations. These associations are collaborative efforts between ranchers, the BLM and Idaho Department of Lands and provide proactive training for coordinated wildfire responses.

Conclusion

ICL appreciates Idaho Power's recognition that climate change is impacting Idahoans today through increased risk of wildfires. We support taking action to mitigate this risk, both to keep Idaho Power's infrastructure secure and to prevent this same system igniting fires on the landscape. To improve the Plan, ICL recommends Idaho Power more formally collaborate with land management agencies to leverage investments and activities across utility dollars and other public spending.

Respectfully submitted this 8th day of April 2021,

/s/ Dainee M. Gibson-Webb

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/s/ Benjamin J. Otto

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of April 2021, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted:

/s/ Benjamin Otto
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Electronic Mail only (See Order 34602):

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