

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER  
COMPANY'S 2021 INTEGRATED  
RESOURCE PLAN

Case No. IPC-E-21-43

**PETITION TO INTERVENE**

Leslie A. Tidwell hereby files this formal petition to intervene Pro Se in the above-referenced matter pursuant to Rules of Procedure 71 through 75 of the Idaho Public Utilities Commission, ID APA 31.01.01.071-.075. The basis of this notice of appeal follows:

1. The name and address of this Intervenor is:

Kiki Leslie A. Tidwell  
704 N. River St. #1  
Hailey, ID 83333  
(208)578-7769

2. I am a ratepayer in Idaho and a Blaine County resident. Idaho Power Company ("Idaho Power" or "Company") has requested that the Commission acknowledge the Company's 2021 Integrated Resource Plan ("IRP" or "Plan"). The preferred plan IRP puts me at risk as a small Idaho Power ratepayer, due to the Company's insufficient planning for both for the availability and cost of purchased power, and the additional millions of tons of carbon dioxide the Company will emit into the air through its own resource generation. The Company has not



modeled nor disclosed the emissions from market purchases, estimated to be 3,316,296 MWhs annually by year 2040. The Company's Preferred Portfolio emits ~42,000,000 tons of carbon emissions from its own resource generation over the planning period; approximately 27-28 million tons higher than the Clean by 2035 portfolio and 6-7 million tons higher than the Clean by 2045 Portfolio's modeled emissions, both of which the Company rejected in its planning process. Idaho Power has failed to mention several facts in its application to the Idaho PUC that I will bring to light by participating in this case.

3. The Idaho PUC is aware of Idaho Power's potential near-term generation capacity shortfall as the Company has submitted Case IPC-E-21-41, where it has requested to skip the Public Utilities Commission of Oregon's ("OPUC") resource procurement rules in order to "meet identified generation resource needs in 2023, 2024, and 2025. Specifically, the Company stated, "...during the preparation of the 2021 IRP...an updated Load and Resource (L&R) balance analysis in May 2021 identified a first capacity deficit of 78 megawatts ("MW") in June 2023, growing each year through 2026..."<sup>1</sup>

4. "the Company's projected capacity deficits have grown to 101 MW in 2021, 186 MW in 2024, and 311 MW in 2025."<sup>2</sup>

5. "The net change between the Second Amended 2019 IRP and the updated L&R balance is a reduction of over 500 MW in available capacity each July during the 2022-2025 time period."<sup>3</sup>

6. Additional to the above deficits, the Jackpot Solar generation plant is listed in the Preferred Plan IRP to come online with 120 MW of capacity in January 2023. It is my

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<sup>1</sup> Case IPC-E-21-41 Application for Authority to Proceed with Resource Procurements pg 2

<sup>2</sup> Ibid, pg 6

<sup>3</sup> Ibid, pg 7



understanding that the Company has been notified that this deadline will not be met by the developers.

7. “The Hells Canyon Complex provides 70% of Idaho Power’s hydroelectric generating capacity and 30% of the company’s total generating capacity.” Relicensing of this complex has been ongoing since July 2005 and is expected to finish “in 2024 or thereafter”, according to the IRP. The American Falls hydroelectric project’s FERC license expires in 2025. But costs to comply with a new license have not been determined or incorporated at this time. “No reduction of the available capacity or operational flexibility of the hydroelectric plants to be relicensed has been assumed in the 2021 IRP.”<sup>4</sup>

8. Idaho Power’s IRP references the River Management Joint Operating Committee; this entity’s most recent report *Climate Change Impacts on the Snake River Basin*, notes that climate change has been and will be affecting water availability especially in the Snake River basin, “Average winter snowpacks are very likely to decline over time as more winter precipitation falls as rain instead of snow, especially in the US side of the Columbia Basin. • By the 2030s, higher average fall and winter flows, earlier peak spring runoff, and longer periods of low summer flows are very likely. The earliest and greatest streamflow changes are likely to occur in the Snake River Basin, although that is also the basin with the greatest modeling and forecast uncertainty.”<sup>5</sup>

9. Furthermore, the Plan counts on the B2H proposed transmission line to provide as much as 550 MW of summer capacity through purchases in Mid-C markets starting in 2026.<sup>6</sup> This transmission line has been under review since 2006 and at present, has not been fully permitted, increasing the risk that the generation deficit will be more than double what was

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<sup>4</sup>2021 Integrated Resource Plan pg 17-18

<sup>5</sup> *Climate Change Impacts on the Snake River Basin*, pg 104

<sup>6</sup> 2021 Integrated Resource Plan pg 144



projected in case IPC-E-21-41. Over the planning period, Idaho Power has increased its share of the ownership of this project to 45% from 21%, a significant capital commitment.

10. The Company's ability to mitigate its generation deficits via power purchases is not guaranteed. Idaho Power has noted that the availability to purchase capacity from transmission from other markets has "changed dramatically." In August 2020 "the West experienced a heat wave, increasing the demand for energy and causing several balancing authorities across the Western Interconnection to declare energy emergencies. Generation was not able to meet demand in California and transmission capacity was strained... Ultimately, this also impacted Idaho Power's ability to use third party transmission to import energy and meet load deficits... Understanding the importance of transmission availability during times of high electricity demand, third-party marketing firms began reserving unprecedented amounts of firm transmission capacity just outside the Company's border, significantly limiting Idaho Power's access to market hubs."<sup>7</sup> "Idaho Power tested the market availability with an RFP issued April 26, 2021.... however, no bids were received at any price-point, further emphasizing the difficulty of importing energy under a constrained transmission system."<sup>8</sup>

11. With generation deficits and the challenges in procuring purchased power, there is an increased likelihood that Idaho Power will fall back on and increase its use of fossil-based generation in its portfolio. In recent years, the Company thought that it could retire Valmy 2 by 2022, but recently petitioned to keep this coal-fired plant running through 2025.

12.. Jim Bridger Unit 2 (617 MW) has not received upgrades to operate under EPA clean air rules. It has emergency authorization to operate for 4 months. The ceasing of this plant's operations may further constrain generation capacity. "CHEYENNE, Wyo. (RELEASE)

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<sup>7</sup> Case IPC-E-21-41 Application for Authority to Proceed with Resource Procurements Idaho PUC pg 8-9

<sup>8</sup> *ibid* pg 9



- Governor Mark Gordon signed a Temporary Emergency Suspension Order that allows Unit 2 of the Jim Bridger Power Plant to continue operating for at least 4 months and avert a New Year's Day shut down of the unit. More than eighteen months ago, Wyoming submitted a revised State Implementation Plan (SIP) to the Environmental Protection Agency (EPA) that would have allowed Unit 2 of the power plant to continue to operate and still meet the regional haze guidelines. The revised SIP was originally approved by the EPA in 2020, but earlier this year, Michael Regan, Administrator of the EPA for the Biden Administration, reversed course and refused to honor the prior approval. Consequently, a costly and outdated SIP remains in effect. That SIP requires the addition of expensive selective catalytic reduction equipment to be installed on Unit 2 by December 31, 2021. At this date, it is impossible to add such equipment.<sup>9</sup> Instead of retiring this coal plant, the Company has pursued emergency extensions while it knows that it is operating without clean air mitigation.

13. I, as an Idahoan, am affected by climate change. I have been evacuated twice from wildfires actively raging near my home and have been received several other pre-alerts to evacuation. The carbon emissions from Idaho Power's operations are contributing to climate change. The Intergovernmental Panel on Climate has stated that it is necessary to contain global warming 1.5 degrees Celsius above pre-industrial levels. Idaho Power's selected preferred IRP plan emits ~7,000,000 more tons of carbon than the Clean by 2045 modeled plan, even without counting the emissions from the millions of MWhs the Company plans to purchase from the market. Idaho Power has provided projections on their Total Load in MWh for each year through 2040 (exhibit). By 2040, purchased power is projected to be 3,316,296 MWhs, the

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<sup>9</sup> Federal Register, 85 FR 10000, 10001 (Feb. 23, 2020), <https://www.federalregister.gov/documents/2020/02/23/20020000-air-quality-criteria-for-particulate-matter>



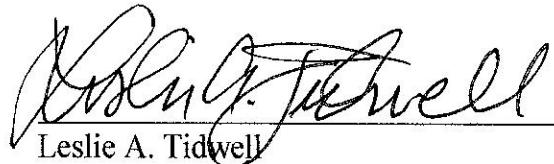
emissions of which is not included in their Emissions calculations. It could be all coal-fired purchases with significant carbon emissions.

14. In 2020, the Company's overall Emissions increased by 22% from 2019. Since 2018, CO<sub>2</sub> emissions from Idaho Power's owned generation increased by 24.4%. In its Carbon Disclosure Project, 2 the Company attributed the increase in carbon intensity to the lack of water for hydro and population growth. Carbon intensity increased by 27% since 2018. When snowpack is lower and the stream flows are lower than projections, the Company uses fossil fuel generation to make up for the lack of hydro generation. With projected generation capacity deficits and volatile hydro, it appears that the Company will increase its use of fossil fuels for the near term at least. It is my understanding that it has no plans to build its own solar and wind power capacity, although development and ownership of their own solar and wind generation plants could possibly enable the company to reduce its reliance on high-carbon power generation when it is needed during low-water years.

15. Furthermore, the Company does not plan now to retire coal-fired power plants but convert them to burning fossil gas through 2034. The Company's Preferred Plan leaves a shortfall gap to achieve their stated 100% by 2045 goal; at least 23% of reductions will need to be achieved between 2041 and 2045, apparently with 'new technologies' that will appear by that time. Idaho Power has not submitted a plan with a prudent path to achieve their own stated goal, a goal that is vital to Idahoans who are living with the effects of climate change. I request to participate pro se as an Intervenor in IPC-E-25-43.



DATED this 18<sup>th</sup> day of January, 2022.

  
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Leslie A. Tidwell  
Pro Se

**CERTIFICATE OF SERVICE**

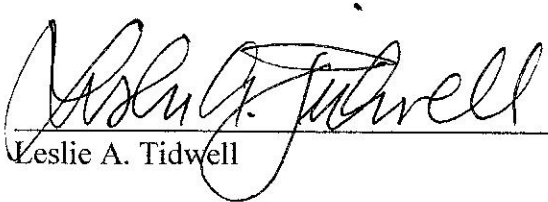
I hereby certify that on this 18<sup>th</sup> day of January, 2022, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Idaho Power

U.S. Mail  
 Overnight Mail  
 Hand Delivery  
 Fax  
 Email  
pharrington@idahopower.com

U.S. Mail  
 Overnight Mail  
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U.S. Mail  
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Leslie A. Tidwell



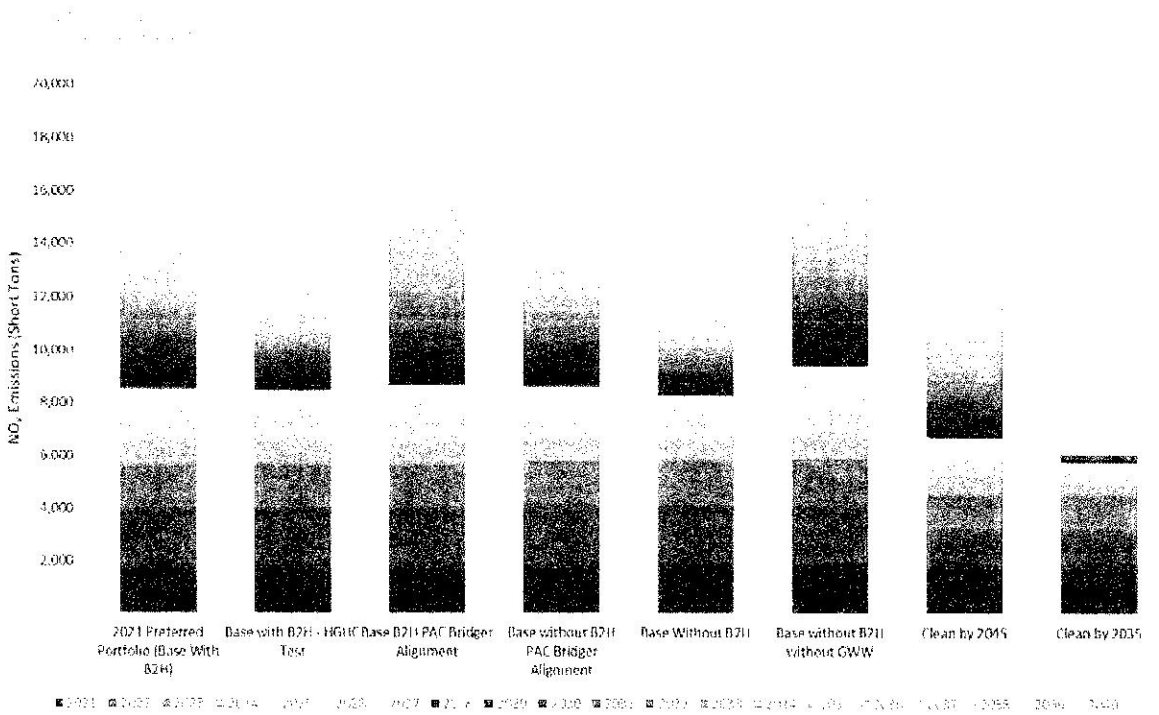
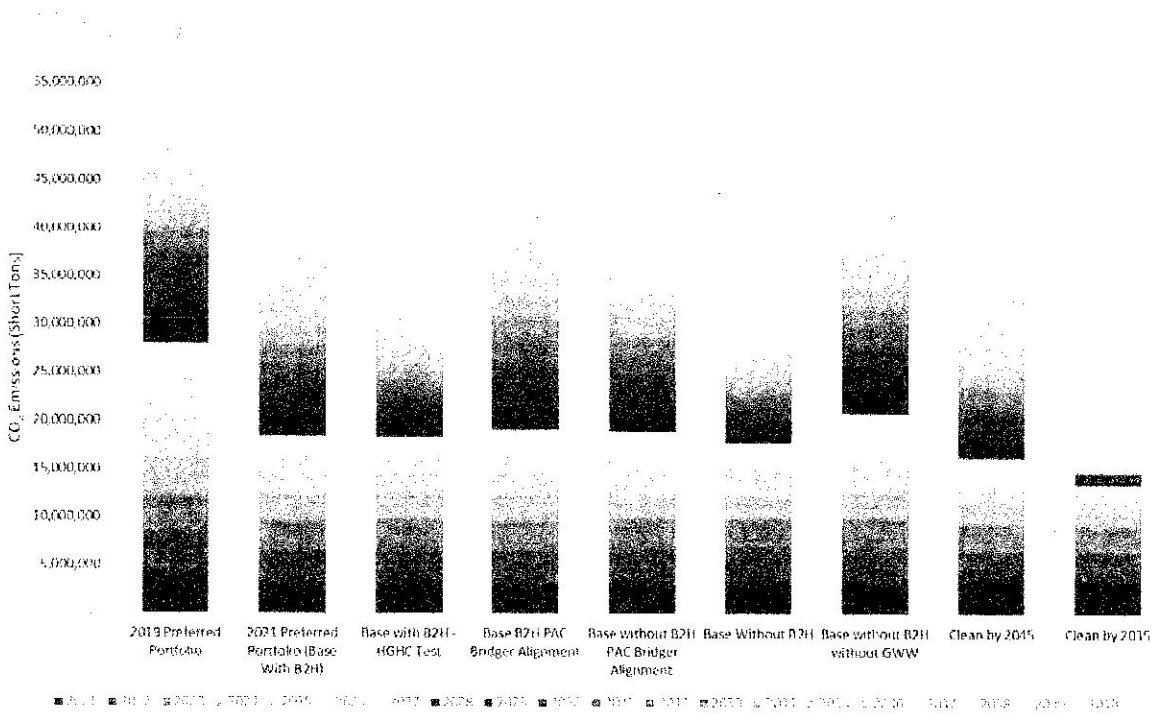
Year	IPC Total Load (MWh)	IPC Resource Total* (MWh)	IPC Resource Emissions (short tons)	IPC Resource Emiss Intensity (lb/MWh)	Percent Reduction from 2005
2005			8,067,721	1194.01	
2021	16,600,582	16,132,306	3,146,734	390.12	61%
2022	16,869,354	16,430,459	3,464,248	421.69	57%
2023	17,210,582	16,670,142	3,133,471	375.94	61%
2024	17,640,820	18,648,622	2,428,049	260.40	70%
2025	18,241,438	18,944,812	2,304,014	243.23	71%
2026	18,840,392	19,457,668	2,014,136	207.03	75%
2027	19,420,104	19,679,262	2,025,337	205.83	75%
2028	19,872,960	19,877,020	2,111,398	212.45	74%
2029	19,996,736	19,733,136	1,748,562	177.22	78%
2030	20,125,410	19,316,458	1,725,706	178.68	79%
2031	20,216,158	19,044,408	1,787,393	187.71	78%
2032	20,342,986	19,211,676	1,831,248	190.64	77%
2033	20,428,460	18,804,076	1,905,600	202.68	76%
2034	20,579,894	18,996,942	1,889,374	198.91	77%
2035	20,744,954	18,903,348	1,783,130	188.66	78%
2036	20,926,626	18,844,880	1,787,069	189.66	78%
2037	21,121,340	18,486,164	1,809,568	195.78	78%
2038	21,337,778	18,691,494	1,839,524	196.83	77%
2039	21,527,466	18,692,240	1,869,889	200.07	77%
2040	21,748,748	18,432,452	1,861,797	202.01	77%

\*IPC Resource Total includes hydro, coal, gas, PURPA, solar, wind, storage, demand response, and energy efficiency (the selected bundles, not the EE forecast). It does not include market purchases or sales.

The projected annual CO<sub>2</sub> emissions and emissions intensity for the Preferred Portfolio are also set forth in the following graphs, including a comparison with the 2005 baseline year. The first graph demonstrates that relative to the 2005 baseline, CO<sub>2</sub> emissions are projected to be down 79% for the 2030 benchmark year.

## PORTFOLIO EMISSIONS FORECAST

Total emissions forecasts (CO<sub>2</sub>, NO<sub>x</sub>, and SO<sub>2</sub>) for Idaho Power's resources are outputs of the AURORA model and are presented below.



3. Climate Change

This is shown in the graph 3.1 and 3.2 with the dashed black line indicating the long-term trend and the green line indicating the actual annual amounts.

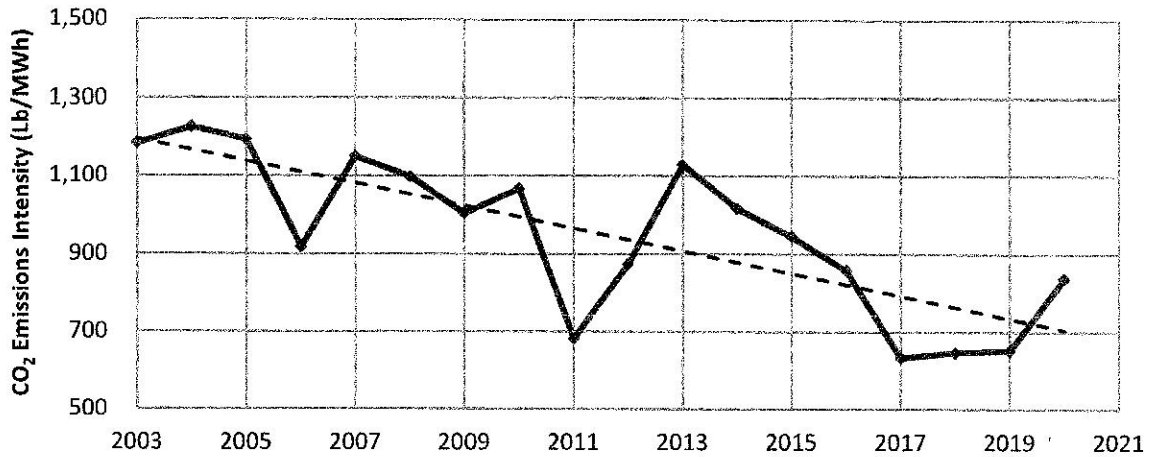


Figure 3.1 Estimated Idaho Power CO<sub>2</sub> emissions intensity

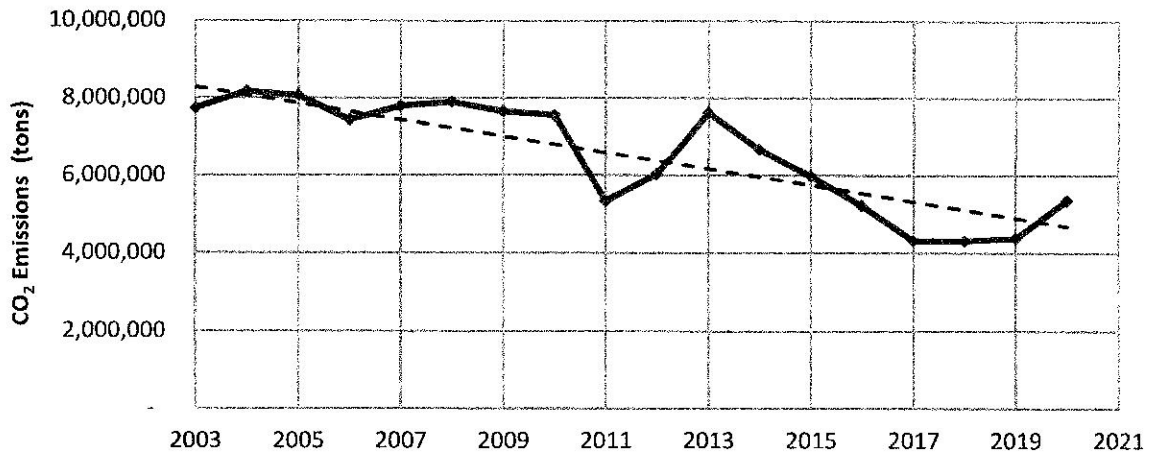


Figure 3.2 Estimated Idaho Power CO<sub>2</sub> emissions

Idaho Power is committed to reducing the amount of CO<sub>2</sub> emitted from energy-generating sources. Since 2009, the company has met various voluntary goals to realize its commitment to CO<sub>2</sub> reduction. From 2010 to 2020, Idaho Power reduced carbon emissions by an average of 29% compared to 2005. The general trend continues to be downward as Idaho Power exits coal generation facilities and adds clean resources. The uptick in 2020 correlates with low water supply, increased demand for electricity, and market conditions.

Generation and emissions from company-owned resources are included in the CO<sub>2</sub> emissions intensity calculation. Idaho Power’s progress toward achieving this intensity reduction goal and

# From 2018, BOTH Overall Emissions & Carbon Intensity Increase

	2005	2018	2019	2020
CO2e Emissions	7,274,162	3,928,678	3,997,457	4,888,078
% change		-46%	+2%	+22%
Carbon Intensity	54%	29%	30%	38%
% change		-46%	+3%	+27% (+18% reported to CDP)

Source: IdaCorp Sustainability & ESG Reports 2019 & 2020, CDP Report 2021