

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

Case No. IPC-E-21-43

COMMENTS

Leslie A. Tidwell hereby files these COMMENTS Pro Se in the above-referenced matter pursuant to pursuant to Rules of Procedure 71 through 75 of the Idaho Public Utilities Commission, ID APA 31.01.01.071-.075 as 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
ktidwell2022@gmail.com

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 is estimated to emit 42,466,246 tons of carbon emissions from its own resource generation over the planning period; approximately 27,613,880 tons higher than the Clean by 2035 portfolio (14,852,366 tons) and approximately 6,503,629 tons higher than the Clean by 2045 Portfolio's modeled emissions (35,962,617 tons), 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.

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..."¹

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

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."³

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

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

² Ibid, pg 6

³ 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.”⁴

8. Idaho Power’s IRP references the River Management Joint Operating Committee; this entity’s most recent report [RMJOC-II-Report-Part-I.pdf \(bpa.gov\)](#), 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.”⁵

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 2026.⁶ 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

⁴2021 Integrated Resource Plan pg 17-18

⁵ [RMJOC-II-Report-Part-I.pdf \(bpa.gov\)](#) pg 104

⁶ 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."⁷ "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."⁸

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)

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

⁸ 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.⁹ Instead of retiring this coal plant, the Company has pursued emergency extensions while it knows that it is operating without clean air mitigation.

13. As well now, a large data center is being built by Meta/Facebook in Western Idaho which will consume large quantities of electricity. Where will this supply come from?

14. 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 ~,6,500,000 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

⁹ [Governor Signs Order to Keep Jim Bridger Power Plant Unit Operating \(wyomingnewsnow.tv\)](https://www.wyomingnewsnow.tv/governor-signs-order-to-keep-jim-bridger-power-plant-unit-operating)

through 2040. By 2040, purchased power is projected to be 3,316,296 MWhs, the emissions of which is not included in their Emissions calculations. It could be all coal-fired purchases with significant carbon emissions.

15. In 2020, the Company's overall Emissions increased by 22% from 2019. Since 2018, CO2 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.

16. 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.

DATED this 20th day of March 2022.



Leslie A. Tidwell
Pro Se

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE I HEREBY CERTIFY that on the 20th day of March 2022 I served a true and correct copy of EVIDENCE SUBMITTED FOR CASE IPC-E-21-43 IN THE MATTER OF IDAHO POWER COMPANY'S 2021 INTEGRATED RESOURCE PLAN

upon the following named parties by the method indicated below, and addressed to the following:

Donovan E. Walker, Idaho Power Company
P.O. Box 70 Boise, Idaho 83707-0070

U.S. Mail

Overnight Mail

Hand Delivery

Fax

Email dwalker@idahopower.com, dockets@idahopower.com

Timothy E. Tatum, Idaho Power Company
P.O. Box 70 Boise, Idaho 83701-0070

U.S. Mail

Overnight Mail

Hand Delivery

Fax

Email ttatum@idahopower.com

Commission Staff

Dayn Hardie

Deputy Attorney General

Idaho Public Utilities Commission

11331 W. Chinden Blvd., Bldg No. 8 Ste 201-A

Boise, ID 83720-0074

U.S. Mail

Overnight Mail

Hand Delivery

Fax

Email dayn.hardie@puc.idaho.gov

Idaho Conservation League

Benjamin J. Otto

Emma E. Sperry

710 N. 6th Street

Boise, ID 83702

U.S. Mail

Overnight Mail
 Hand Delivery
 Fax
 Email: botto@idahoconservation.org, esperry@idahoconservation.org

Micron Technology, Inc.
Austin Rueschhoff
Thorvald A. Nelson
Austin Jensen
Holland & Hart LLP
555 17th St, Ste 3200
Denver, CO 80202

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email drueschhoff@hollandhart.com, TNelson@hollandhart.com,
Awjensen@hollandhart.com, aclee@hollandhart.com, glgarganoamari@hollandhart.com

Jim Swier
Micron Technology, Inc.
8000 South Federal Way
Boise, ID 83707

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email jswier@micron.com

Clean Energy Opportunities for Idaho

Michael Heckler
Courtney White
3778 Plantation River Dr., Ste 102
Boise, ID 83703

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email courtney@cleanenergyopportunities.com,
michael@cleanenergyopportunities.com

Kelsey Jae
Law For Conscious Leadership
920 N. Clover Dr.
Boise, ID 83703

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email Kelsey@kelseyjae.com

Industrial Customers of Idaho Power
Peter J. Richardson
Richardson, Adams, PLLC
515 N. 27th Street
Boise, ID 83702

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email peter@richardsonadams.com

Dr. Don Reading
6070 Hill Road
Boise, ID 83703

U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email dreading@mindspring.com

STOP B2H Coalition

Jack Van Valkenburgh
Valkenburg Law PPC.
PO Box 531
Boise, ID 83701

U.S. Mail

Overnight Mail
 Hand Delivery
 Fax
 Email jack@vanvalkenburghlaw.com

Jim Kreider
STOP B2H Coalition
 U.S. Mail
 Overnight Mail
 Hand Delivery
 Fax
 Email jim@stopb2h.org


Kiki Leslie A. Tidwell

FRAN: IDATO POWER

Short Tons	2019 Preferred Portfolio	2021 Preferred			Base without B2H		
		Portfolio (Base With B2H)	Base with B2H - HGHC Test	Base B2H PAC Bridger Alignment	PAC Bridger Alignment	Base without B2H	Base without B2H without GWW
2021	4,142,917	3,146,734	3,174,652	3,166,581	3,210,606	3,254,110	3,248,182
2022	4,326,710	3,464,248	3,457,309	3,458,937	3,491,862	3,527,793	3,504,180
2023	3,840,087	3,133,471	3,165,830	3,127,639	3,242,604	3,203,042	3,296,494
2024	3,895,331	2,428,049	2,422,695	2,423,454	2,409,113	2,320,804	2,720,556
2025	4,262,822	2,304,014	2,325,588	2,308,235	2,193,483	2,122,145	2,644,637
2026	3,905,721	2,014,136	1,867,879	2,296,894	2,268,667	1,671,702	2,708,602
2027	3,558,700	2,025,337	1,898,776	2,296,489	2,066,187	1,680,553	2,671,697
2028	3,558,079	2,111,398	1,636,494	2,358,726	2,109,644	1,160,356	2,707,790
2029	2,548,167	1,748,562	1,180,092	2,308,558	1,990,602	1,113,513	2,197,872
2030	2,315,019	1,725,706	1,119,869	2,277,974	1,860,456	1,031,858	1,996,687
2031	1,706,909	1,787,393	1,152,237	2,301,000	1,879,908	1,106,985	2,022,739
2032	1,670,518	1,831,248	1,181,867	2,309,020	1,896,109	1,155,819	2,094,478
2033	1,740,822	1,905,600	1,230,854	2,380,238	1,896,752	1,255,830	1,981,847
2034	1,705,501	1,889,374	1,212,883	2,335,756	1,827,498	1,240,222	2,018,752
2035	1,727,169	1,783,130	1,153,352	1,790,343	1,270,332	1,168,749	1,867,837
2036	1,677,270	1,787,069	1,190,630	1,790,696	1,302,445	1,192,219	1,873,732
2037	1,701,554	1,809,568	1,240,107	1,791,311	1,347,049	1,280,031	1,950,650
2038	1,784,579	1,839,524	1,343,356	1,836,212	1,395,517	1,370,352	2,017,738
2039	1,719,214	1,869,889	1,368,765	1,824,300	1,398,964	1,374,569	2,002,704
2040	1,721,957	1,861,797	1,397,746	1,781,920	1,434,282	1,412,664	2,027,095
	53,509,045	42,466,246	34,720,978	46,164,282	40,492,079	33,643,316	47,554,269

	Clean by 2045	Clean by 2035
	3,528,110	3,547,229
	2,864,035	2,863,899
	2,903,315	2,909,474
	2,103,729	1,399,537
	1,731,129	1,167,560
	1,542,495	846,472
	1,597,056	810,861
	1,433,192	454,496
	1,422,995	429,457
	1,356,832	103,602
	1,421,626	96,729
	1,427,402	84,737
	1,545,607	71,618
	1,560,475	66,695
	1,501,876	-
	1,508,419	-
	1,565,187	-
	1,643,583	-
	1,662,771	-
	1,642,784	-
	35,962,617	14,852,366