

Marie Callaway Kellner (ISB No. 8470)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
(208) 537-7993  
mkellner@idahoconservation.org

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO</b>	)	
<b>POWER COMPANY'S</b>	)	
<b>APPLICATION FOR A</b>	)	<b>CASE NO. IPC-E-23-01</b>
<b>CERTIFICATE OF PUBLIC</b>	)	
<b>CONVINENCE AND NECESSITY</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>FOR THE BOARDMAN TO</b>	)	
<b>HEMINGWAY 500KV</b>	)	<b>COMMENTS</b>
<b>TRANSMISSION LINE</b>	)	

COMES NOW the Idaho Conservation League (“ICL”) with the following brief comments on Idaho Power’s (“IPC” or “Company”) request for a Certification of Public Convenience and Necessity (“CPCN”) for the Boardman to Hemingway (“B2H” or “line”) transmission line. ICL offers qualified support for the line and recommends the Commission approve the Company’s requested CPCN. In accordance with Commission Rules of Procedure, IDAPA 31.01.01.203, and Order No. 35731 in the above captioned docket, ICL submits these comments.

**Comments**

ICL commends the Company for past and ongoing line planning in recent Integrated Resource Plan (“IRP”) cycles. This application, the attached testimonies, and both the Company’s acknowledged 2021 IRP and in-process 2023 iteration adequately demonstrate that the B2H line allows the Company to develop a de-carbonized least-cost, least risk resource

portfolio. Though we maintain questions as to whether the size and configuration of the line is best optimized to reduce customer costs and promote non-carbon development relative to local, mid-sized and distributed generation, we reserve those questions here in recognition that the transmission capacity afforded by the B2H project benefits long-term grid stability and renewable integration. Nor do these comments concern siting issues, which have been addressed or litigated elsewhere. As modeled, the B2H line is broadly necessary for the company to address projected load-growth, regional resource adequacy and diversity, and market integration. For these reasons and those offered in the Company's application, ICL recommends the Commission grant the requested CPCN.

However, we urge the Commission to consider the Company's contention that the B2H line is necessary to develop a de-carbonized resource portfolio. From early stages of planning and marketing materials to this current application, the Company has stated the B2H project will provide transmission capacity needed to integrate increasing volumes of renewable power and to meet its clean-energy goals. We believe the Company's planning shows this is so. But, to the best of our knowledge, we also note that the Company is under no obligation from this Commission to procure clean or carbon free resources, despite continuing representation of this intention in filings. To the extent that the Company justifies the line as a pathway to decarbonization, we recommend that the Commission condition this CPCN on renewable development or otherwise limit transmission of new thermal generation or operation of existing resources past presently planned exit dates. As an alternative to a binding condition on the requested CPCN, reporting on renewable resource development unlocked by the B2H line could hold the Company to a degree of accountability on its contended purpose for the line.

Finally, while we respect the Company's proposal to defer ratemaking treatment to a later docket, we note that this arrangement and its current minority ownership agreement exposes Idaho based customers to potential risks of cost-overruns and delay. We encourage the Commission to consider conditions or mechanisms to mitigate or cap financial risks to ratepayers.

### **Conclusion**

ICL recommends the Commission grant the Company's requested CPCN for the B2H project and consider conditions to ensure promised renewable development. B2H is necessary to develop the Company's preferred least-cost, least-risk portfolio and open credible pathways to local and regional decarbonization. The Company's application, public involvement, and long-term IRP planning all support approval of a CPCN. Additionally, we encourage the Commission to condition approval on clean energy commitments or reporting and limits to financial risks passed on to rate payers.

DATED: May 23, 2023

/s/ Marie Callaway Kellner

Marie Callaway Kellner  
Attorney for the Idaho Conservation League

## CERTIFICATE OF SERVICE

I hereby certify that on this 23<sup>rd</sup> day of May 2023, I delivered true and correct copies of the foregoing COMMENTS to the following persons via the method of service noted:

/s/ Marie Callaway Kellner

Marie Callaway Kellner (ISB No. 8470)  
Attorney for the Idaho Conservation League  
710 N. 6<sup>th</sup> St.  
Boise, Idaho 83702  
mkellner@idahoconservation.org

### Electronic Mail Only (See Order No. 35058)

#### *Idaho Public Utilities Commission*

Jan Noriyuki  
Commission Secretary  
jan.noriyuki@puc.idaho.gov  
secretary@puc.idaho.gov

#### *Commission Staff*

Michael Duval  
Deputy Attorney General  
Idaho Public Utility Commission  
Micheal.duval@puc.idaho.gov

#### *Idaho Power Company*

Donovan Walker  
Timothy Tatum  
P.O. Box 70  
Boise, ID 37707-0070  
dwalker@idahopower.com  
dockets@idahopower.com  
ttatum@idahopower.com

#### *Idaho Irrigation Pumpers Association, Inc.*

Eric L. Olsen  
Echo Hawk & Olsen PLLC  
505 Pershing Ave, Suite 100  
Pocatello, ID 83205  
elo@echohawk.com

Lance Kaufman  
2623 NW Bluebell Place  
Corvallis, OR 97330  
lance@aegisinsight.com

#### *Industrial Customers of Idaho Power*

Peter Richardson  
Richards, Adams PLLC  
515 N. 27<sup>th</sup> Street  
Boise, ID 83702  
peter@richardsonadams.com  
Dr. Don Reading  
280 S. Silverwood Way  
Eagle, ID 83616  
dreading@mindspring.com

*Micron Technology, Inc.*

Jim Swier  
8000 S. Federal Way  
Boise, ID 83707  
jswier@micron.com

Austin Rueschhoff  
Thorvald A. Nelson  
Austin W. Jensen  
Holland & Hart, LLP  
555 17<sup>th</sup> Street Suite 3200  
Denver, CO 80202  
darueschhoff@hollandhart.com  
tnelson@hollandhart.com  
awjensen@hollandhart.com  
aclee@hollandhart.com

*City of Boise*

Ed Jewell  
Darrell Early  
Deputy City Attorney  
150 N. Capitol Blvd.  
PO Box 500  
Boise, ID 83701-0500  
ejewell@cityofboise.org  
dearly@cityofboise.org  
boisecityattorney@cityofboise.org

Wil Gehl  
Energy Program Manager  
Boise City Dept. of Public Works  
wgehl@cityofboise.org

