

**From:** jim kreider <[jkreider@campblackdog.org](mailto:jkreider@campblackdog.org)>

**Sent:** Thursday, May 25, 2023 6:38 PM

**To:** Jan Noriyuki ·

**Cc:** jim kreider <[jkreider@campblackdog.org](mailto:jkreider@campblackdog.org)>; Fuji Kreider <[fkreider@campblackdog.org](mailto:fkreider@campblackdog.org)>

**Subject:** Certificate of Public Convenience and Necessity CASE NO. PAC-E-23-01 Order No. 35769 with a June 12, 2023 comment deadline

**CAUTION:** This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.

---

Hello Secretary and members of the company,

Attached please find my comments for CASE NO. PAC-E-23-01 PAC's petition for a Certificate of Public Convenience and Necessity for the Boardman to Hemingway Transmission line.

If you have any questions please contract me at this email address or 541.406.0936.

Thank You

Jim Kreider

05/25/23

Commission Secretary  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

RECEIVED  
2023 May 25, 6:38PM  
IDAHO PUBLIC  
UTILITIES COMMISSION

Re: Certificate of Public Convenience and Necessity CASE NO. PAC-E-23-01 Order No. 35769 with a June 12, 2023 comment deadline

Hello commissioners, staff, and members of the public,

I ask the commission to reject PacifiCorp application for a Certificate of Public Convenience and Necessity ("CPCN") for Energy Gateway Segment H, the Boardman-to-Hemingway 500-kilovolt ("kV") transmission line ("B2H" or "Project"). The Company will co-own B2H with Idaho Power Company ("IPC"), which recently filed its own CPCN application for the Project in Case No. IPC-E-23-01.

This transmission line is unneeded for the reasons outline below.

1. This transmission line will rely on an inadequate energy from the Mid-C Trading hub in the Pacific Northwest;
2. House Concurrent Resolution 4

I. This transmission line will rely on energy from the Mid-C Trading hub in the Pacific Northwest. The CPCN would enable, Idaho Power the line operator, to export energy from the Mid-C, which is entering a resource inadequacy. The Pacific Northwest Power Supply Adequacy Assessment for 2027 in the Executive Summary in part says<sup>1</sup>,

As in the plan, this assessment found risk factors to monitor when determining how to implement and adapt the resource strategy to the wide range of uncertainties the region faces. If regional planners observe increased demand due to accelerated electrification in any part of the region without an associated increase in resources and reserves, and/or resources of significant size are retired without replacement, the risk of adequacy issues increases significantly.

The inadequacy is due to the accelerated retirement of carbon generation resources and a slower replacement of that lost capacity by renewable energy systems. Energy prices will increase due to this resource inadequacy naturally. However, with this additional export of 350+MW energy prices for all Mid-C and Idaho Power customers will increase based on market forces.

Logic would suggest that if Idaho Power built more of their own renewable generation in Idaho, closer to load and enhancing its intrastate transmission/distribution system as it plan to do regardless of this CPCN outcome. It will reduce energy costs in both markets. The IPUC staff in IPC-E-19-14 Application for Power Purchase Sales Agreement with Jackpot Holdings found that the 120 MW PPA with Jackpot was more cost effective than buying energy from the Mid-C (see Exhibit 1, pp. 10-13). If both regions (Idaho and Mid-C) build renewables to

---

1 [Pacific Northwest Power Supply Adequacy Assessment for 2027-Executive Summary](#)

meet their resource inadequacies a new large transmission system will not be needed. The states ability to generate its own energy to meet its needs would give Idaho energy independence and Idaho Powers customers would be less impacted by price inflation. With regional generation and load more in balance the current transmission system can be upgraded, reconducted, and fire hardened for maximum benefits.

- II. During the 2023 Idaho Legislative session it passed House Concurrent Resolution 4<sup>2</sup>. The purpose was: Currently, there is an application pending before the Bureau of Land Management to approve the placement of approximately 400 wind turbines in Jerome, Lincoln, and Minidoka Counties. There has been near unanimous opposition to the project by local governments, including counties and highway districts. The short-term build-out impacts will severely impact the local economy. The long-term impact of the public access, agricultural uses and wildlife are of concern to the citizens of the Magic Valley. This Concurrent resolution will highlight the concerns of the Magic Valley and request the Governor and Attorney General to take what legal actions are available to encourage the BLM to select the no build option<sup>3</sup>.

This is exactly what the B2H a 300 mile 500 kV transmission line will do to 6 Idaho/Oregon counties. Many of these counties are in Oregon but may soon be a part of Idaho because of House Joint Memorial 1<sup>4</sup>. Its states, "The purpose of this memorial is to authorize the Idaho and Oregon legislatures to begin official discussions on whether it is feasible to move the Idaho border into Eastern Oregon<sup>5</sup>. Many of the Oregonians that are in the Greater Idaho Movement would appreciate your denial of the CPCN as the Idaho legislature stated its lack of support for Lava Ridge and selected the no build option.

I offer below the following modified House Concurrent Resolution 4 using track changes to express what I believe would be the thoughts of the Idaho Legislature in instructing the commission to deny the CPCN based on House Concurrent Resolution 4.

Thank you

/Jim Kreider/

Jim Kreider  
60366 Marvin Rd  
La Grande, OR 97850

---

2 <https://legislature.idaho.gov/sessioninfo/2023/legislation/HCR004/>

3 <https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2023/legislation/HCR004SOP.pdf>

4 <https://legislature.idaho.gov/sessioninfo/2023/legislation/HJM001/>

5 <https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2023/legislation/HJM001SOP.pdf>



**From:** jim kreider <[jkreider@campblackdog.org](mailto:jkreider@campblackdog.org)>

**Sent:** Thursday, May 25, 2023 6:54 PM

**To:** Jan Noriyuki

**Cc:** Fuji Kreider

**Subject:** Re: Certificate of Public Convenience and Necessity CASE NO. PAC-E-23-01 Order No. 35769 with a June 12, 2023 comment deadline

**CAUTION: This email originated outside the State of Idaho network. Verify links and attachments BEFORE you click or open, even if you recognize and/or trust the sender. Contact your agency service desk with any concerns.**

---

Hello all,

I understand that the last 2 pages of the PDF attachment I just sent may have errors in opening it. The last 2 pages are in this now attached pdf called IPUC letter for PAC CPCN-CASE NO. PAC-E-23-01. This was inserted into the original PDF and seems to be causing the error.

On 5/25/2023 5:37 PM, jim kreider wrote:

Hello Secretary and members of the company,

Attached please find my comments for CASE NO. PAC-E-23-01 PAC's petition for a Certificate of Public Convenience and Necessity for the Boardman to Hemingway Transmission line.

If you have any questions please contract me at this email address or 541.406.0936.

Thank You

Jim Kreider

LEGISLATURE OF THE STATE OF IDAHO  
Sixty-seventh Legislature First Regular Session – 2023

IN THE HOUSE OF REPRESENTATIVES  
HOUSE CONCURRENT RESOLUTION NO. 4  
BY RESOURCES AND CONSERVATION COMMITTEE

1 A CONCURRENT RESOLUTION  
2 STATING FINDINGS OF THE LEGISLATURE EXPRESSING CONCERN OVER THE PROPOSED  
3 ~~LAVA RIDGE~~ Boardman to Hemingway (B2H) PROJECT AND SUPPORTING A NO-BUILD  
OPTION.

4 Be It Resolved by the Legislature of the State of Idaho:

5 WHEREAS, the United States Bureau of Land Management and the Oregon Department of Energy  
(ODOE) has under consid-  
6 eration an application from Idaho Power Corporation ~~LS Energy~~ to lease and condemn an extensive  
amount of acres  
7 of public ~~land~~ and private land, ~~Lava Ridge~~ for Boardman to Hemingway (B2H), in ~~Jerome, Lincoln,~~  
~~and Minidoka~~ Owyhee, Id; Malheur, Or; Baker, Or; Union, Or; Umatilla, Or and Morrow, Or Counties  
soon the be annexed into Idaho per House Joint Memorial 1; and

8 WHEREAS, Idaho Power ~~LS Energy~~ plans to construct 305 miles of high-voltage (500 kV)  
transmission lines in a 250' wide clear cut corridor with 1198 steel lattice towers ~~400 wind turbines~~, with  
a maximum  
9 height of up to 200 ~~740~~ feet, 440 ~~381~~ miles of access roads, taking xx# acres of private land, XX#  
acres public land and the infrastructure to  
10 support their construction and maintenance; and

11 WHEREAS, the height of the ~~turbines~~ transmission towers will impact civil, military, and  
12 agricultural flight operations; and

13 WHEREAS, the energy created by the ~~Lava Ridge~~ Boardman to Hemingway Project is designed and  
14 planned to provide energy to ~~Southern Nevada and California~~ Idaho; and

15 WHEREAS, the States of ~~Idaho Nevada and California~~ has ~~ve~~ tremendous open space  
16 that could accommodate this project and more directly move the impacts to the  
17 beneficiaries; and

18 WHEREAS, the ~~Magie Valley~~ Northeastern Oregon economy currently has a shortage of housing,  
19 available workforce, and construction capacity, stressing the local markets  
20 needed to support the build out of Boardman to Hemingway (B2H) ~~Lava Ridge~~; and

21 WHEREAS, local citizens and businesses are concerned about the impact  
22 of a boom-and-bust economy over a two-year period; and

23 WHEREAS, Idaho is required by law to protect all wildlife. This project  
24 area will severely impact the migration and habitat of local wildlife; and

25 WHEREAS, these lands have been utilized by agriculture, public recre-  
26 ation, hunting, and fishing by the citizens of Idaho and specifically ~~the~~

~~27 Magie Valley~~ Northeastern Oregon; and

28 WHEREAS, the ~~Lava Ridge~~ Boardman to Hemingway Project encroaches upon the historical  
signifi-

29 cance of the ~~Minidoka~~ National Historic Oregon Trail Interpretive Center, Oregon Trail Interpretive  
Park at Blue Mountain Crossing plus 6 other historical crossings, Morgan Lake Park, Glass Natural area,  
Ladd Marsh Wildlife area, a number of state parks and campgrounds, Regional hunting, fishing, biking,  
skiing, birding areas and other recreational opportunities will be adversely impacted, ~~site of the Hunt-~~  
Japanese Relocation

~~30 Camp from World War II~~; and

31 WHEREAS, tremendous public opinion is not favorable to the Boardman to Hemingway (B2H)  
Lava Ridge

32 Project; and

33 WHEREAS, the legislative complexity of the federal, state, and local  
34 laws and regulations associated with the project cause concern for citizens  
35 and local governments.

36 NOW, THEREFORE, BE IT RESOLVED by the members of the First Regular Ses-  
37 sion of the Sixty-seventh Idaho Legislature, the House of Representatives

38 and the Senate concurring therein, that Idaho Attorney General Raúl Labrador

39 and Governor Brad Little review the ~~Lava Ridge~~ Boardman to Hemingway (B2H) Project to assure  
that the in-

40 terests of Idaho are foremost in the final decision.

41 BE IT FURTHER RESOLVED that the Legislature considers the concerns of

42 Idaho and the soon to be annexed Eastern Oregon Counties memorialized in Idaho House Joint  
Memorial 1 ~~the Magie Valley~~ justification to support a no-build option.

---

The following comment was submitted via PUCWeb:

Name: Creighton Hardin

Submission Time: May 26 2023 10:28AM

Email: [hardcrei2@gmail.com](mailto:hardcrei2@gmail.com)

Telephone: 208-604-4730

Address: 6078 old ranch rd

Pocatello, ID 83204

Name of Utility Company: Idah Power

Case ID: PAC-E-23-01

Comment: "I am favor of the the the Boardman to Hemingway transmission line of 1,000 MW to allow bidirectional power sharing between Pacificorp and Idaho Power.

We need these and many others like it to grow or grid to tackle our changing power generation."