

Diane Holt

From: heartfeltson@msn.com
Sent: Wednesday, July 19, 2017 12:30 AM
To: Beverly Barker; Diane Holt; Matthew Evans
Subject: Case Comment Form: Lisa Hecht

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Name of Utility Company: Idaho Power

Comment: Having attended all but one Idaho Power 2017 IRP meeting, I'd like to share my concerns regarding their process for choosing the preferred scenario, an all-gas scenario.

1. As the provider of last resort, Idaho Power must take risk into account. Recent reliable reports on natural gas production indicate that wells nationwide are producing only half the natural gas expected. Idaho Power has accounted for this only via price risk of up to 4x average; it has not accounted for the risk of gas fuel being unavailable, a much more serious, but realistic risk if production is only 50% of expected. Furthermore, since customers share about 95% of the fuel risk, this creates a situation in which the risk of fuel outages and prices both impact Idaho Power customers. This is unacceptable. Idaho Power must account for both unavailability risk, and bear a greater portion of the cost risk.
2. Idaho Power used Lazard's higher-cost end of pricing for solar power, and lower-cost end of Lazard's price spectrum for natural gas. This tilted the preference to natural gas. Idaho Power should use the same area of Lazard's cost spectrum for both to create a level playing field.
3. Energy Security is a form of risk so serious that the U.S. Congress is reviewing a bill to require state plans to address it. Attempts to attack power plants have already occurred. DERs present a lower risk due to their distributed nature, presenting many small targets, rather than one, so would increase grid security over centralized plants. This was not addressed in the plan.
4. The value of T&D reduction and reduced generation due to lower source-to-load loss was not valued and priced for wind and solar projects that could be sited near areas of load growth.
5. The total value stack of storage to the utility and customers was not shown or itemized; only costs.
6. The world's expert meteorologists are measuring accelerating average temperatures, and these can be expected to continue. Yet Idaho Power did not take these into account in its 20-year plan.

Please ask Idaho Power to address these, in its current IPR comment responses, and in its next IRP.

Thanks to the IPUC and Idaho Power for the opportunity to participate in this process!

Lisa Hecht
Retired HP Electrical Engineer and Program Manager

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