

Citizens for Responsible Land Use  
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August 28, 2002

Idaho Public Utilities Commission  
472 W. Washington St  
Boise, ID 83720

Subject: Draft 2002 IPC Integrated Resource Plan  
IPUC Case Number IPC-E-02-08

Dear Commissioners:

Citizens for Responsible Land Use is a non-profit organization which exists in part to advocate responsible energy production and consumption within the state of Idaho. As an intervener in case number IPC-E-01-42, dismissed on July 24, 2002, Citizens for Responsible Land Use (CFRLU) was prepared to present a case questioning the validity of Idaho Power's draft 2002 Integrated Resource Plan.

In the Garnet Case, CFRLU, together with Idaho Rural Council, submitted strong written testimony in by Dr. Tom Power that thoroughly questions the validity of this document as a true Resource Plan. According to Dr. Power, Integrated Resource Planning was developed as a tool to integrate supply-side and demand-side resources into one unified planning process. However, the 2002 IRP makes no effort to integrate supply-side and demand side planning. Throughout the entire draft, there is only a very brief discussion of conservation and demand side management. The discussion of "Existing and Planned Resources," and "Future Resource Options," concludes by saying that "conservation, demand side measures, and pricing options must be carefully designed and targeted to cost effectively address the projected deficits." There is no indication however that Idaho Power, in its Integrated Resource process had done any "careful design and targeting."

For all practical purposes, the Integrated Resource Plan appears to be formulated as a justification for the questionable Garnet Energy Facility. In the plan, Garnet is considered an absolute resource, when we know that this is not the case! Now that the future existence of Garnet Energy is doubtful, the process must be re evaluated. Idaho Power has focused almost solely on a supply-side process, while rejecting true Integrated Resource Planning. Demand Side Management opportunities should and must be explored immediately.

Idaho Power has a unique opportunity at this juncture to create a partnership with its residential and commercial customers to make smart energy moves for the future of Idaho. We sincerely hope that this happens.

Thank you for your time,

Jonna Weber  
On behalf of Citizens for Responsible Land Use

cc: Jean Jewell, Commission Secretary  
Barton Kline, Idaho Power Company  
Greg Said, Idaho Power Company