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**Jean Jewell**

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**From:** ktinsv@cox.net  
**Sent:** Friday, March 26, 2010 6:09 AM  
**To:** Jean Jewell; Beverly Barker; Gene Fadness  
**Subject:** PUC Comment Form

A Comment from Kiki Leslie A. Tidwell follows:

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Case Number: IPC-E-09-33  
Name: Kiki Leslie A. Tidwell  
Address: P.O. Box 2919  
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State: ID  
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Name of Utility Company: Idaho Power  
Add to Mailing List: yes

Please describe your comment briefly:

There are the very real possibilities of rolling blackouts coming up in the next few years. One only has to look at Idaho Power's own 2009 Integrated Resource Planning document on their website [www.idahopower.com](http://www.idahopower.com) to see what a pickle Idaho Power is in. " 8. Planning Criteria and Portfolio Selection Peak Hour Planning 'Figure 8.4 illustrates considerable peak-hour deficits reaching in excess of 500 MW by 2012, and continuing to grow through the remainder of the 20-year planning period.' (90th percentile water and 95th percentile load before Langley Gulch and new demand response programs)"

Idaho Power has been late to the table to realize that coal plants are going to have a limited future in a carbon constrained world. Until 2007 the company had planned to build or buy coal fired power from a plant in Idaho but finally abandoned that plan when it was clear that Idahoans wouldn't accept the mercury, NOx, and CO2 pollution spewing into our blue skies. But 53% of Idaho Power's owned power generation actually did come from coal plants in recent years- all that mercury just happens to fall on other people's kids in Rock Springs, Wyoming, Boardman, Oregon, and Winnemucca, Nevada. Because these emissions are so toxic, the EPA is ready to adopt strict rules on limiting emissions and national legislation has been crafted to curb carbon production. Idaho Power's partner in the Boardman plant, Portland General Electric, recently decided that it will be retiring that 642 MW coal plant rather than investing \$700 million in emissions retrofits. So Idaho Power will be losing 64 MW of generation there.

At the same time, the west has been getting hotter and drier. Nine out of the last ten years are what Idaho Power considers to be below-normal water years for hydro production. " 5. Planning Period Forecasts Hydro A review of Snake River Basin streamflow trends suggests that persistent decline documented in the Eastern Snake Plain Aquifer (ESPA) is mirrored by downward trends in total surface water outflow from the river basin." Idaho Power has been cloud seeding, buying more water rights, and has even tried to have farmers curtailed, trying unsuccessfully to reverse in court long-standing agreements with farmers.

Idaho Power has also been trying to relicense existing hydro dams since 2003 with federal agencies. "2. FERC Relicensing The relicensing process also has the potential to decrease available capacity and increase the cost of a project's generation through additional operating constraints and requirements for environmental protection, mitigation, and enhancement measures imposed as a condition for relicensing."

And then there is constrained transmission that restricts Idaho Power from purchasing more power from other states. " 7. Transmission Resources Boardman to Hemingway 'Idaho Power has received more than 4,000 MW of requests to commence transmission service between 2005 and 2014 on the Idaho-Northwest transmission path. Of the 4,000 MW of service requests, only 133 MW were granted up through 2007 due to the limited available transmission capacity of the existing system.' " 8. Planning Criteria and Portfolio Selection Peak Hour Planning 'At times of peak summer load, Idaho Power is fully using all available transmission capacity from the Pacific Northwest...If Idaho Power is unable to meet reserve requirements, then the company is required to shed load by initiating rolling blackouts.'

To add to Idaho Power's dilemma, there is increasing load growth - especially peak. "3. Idaho Power Today Customer and Load Growth 'Since 1990, Idaho Power has added more than 195,00 new customers... In June 2008, Idaho Power set a new peak-hour system load record of 3,214 MW...Idaho Power expects to add almost 10,000 customers per year through 2029''The expected-case load forecast predicts that peak-hour load requirements are expected to grow at about 57 MW per year and average energy is forecast to grow at approximately 11 aMW per year.'

So with increasing load growth and historical power production capability reducing, Idaho Power has been pushing hard to build new transmission lines and rushed through the Idaho Public Utilities Commission a request to build a 300 MW natural gas power plant which will have somewhat better emissions than a coal plant. The problem is that the plant won't be finished until 2013 and the transmission line is bogged down in controversy and probably won't be built until that year as well. Idaho Power is now rolling out demand side energy efficiency programs to reduce power use, but they may not be enough. Their series of charts in the IRP that detail potential shortfalls in handling load are alarming and these shortfalls can start in 2010.

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>  
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