

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

Dean J. Miller (ISB No. 1968)  
Chas. F. McDevitt (ISB No. 835)  
Celeste K. Miller (ISB No. 2590)  
McDEVITT & MILLER LLP  
420 West Bannock Street  
P.O. Box 2564-83701  
Boise, ID 83702  
Tel: 208.343.7500  
Fax: 208.336.6912  
[joe@mcdevitt-miller.com](mailto:joe@mcdevitt-miller.com)  
[chas@mcdevitt-miller.com](mailto:chas@mcdevitt-miller.com)  
[ck@mcdevitt-miller.com](mailto:ck@mcdevitt-miller.com)

*Attorneys for the Snake River Alliance*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	CASE NO. IPC-E-13-16
COMPANY'S APPLICATION FOR A	)	
CERTIFICATE OF PUBLIC CONVENIENCE	)	PETITION TO CLARIFY ORDER
AND NECESSITY FOR THE INVESTMENT	)	NO 32929
IN SELECTIVE CATALYTIC REDUCTION	)	
CONTROLS ON JIM BRIDGER UNITS 3	)	
AND 4.	)	

COMES NOW the Idaho Conservation League, the Snake River Alliance and the Idaho Chapter of the Sierra Club<sup>1</sup> with this Petition for Clarification of Order No. 32929 pursuant to IDAPA 31.01.01.325.<sup>2</sup> The undersigned respectfully request the Commission clarify the scope and contents of the quarterly reports the Order obligates Idaho Power to submit. *See Order No 32929*

<sup>1</sup> While the Idaho Chapter of the Sierra Club is not an official party to this docket, IDAPA 31.01.01.325 permits "any person" to join a Petition for Clarification. The Club is affected by the Commission's final order in the same manner as the Idaho Conservation League and the Snake River Alliance.

<sup>2</sup> As a Petition for Clarification the IDAPA rules do not set forth a deadline for Cross-Petition or Answer to this motion. *Compare* IDAPA 31.01.01.325 *with* IDAPA 31.01.01.331.

at 11, 13. Providing greater clarity regarding these reports will assist the Commission, Staff, and other stakeholders “to stay abreast of potential future regulations that could negatively impact [the] investment in the Bridger upgrade.” *Id.*, at 11. Similarly, while not mentioned in the order, the undersigned also request the Commission direct Idaho Power to include updates on changing costs, permitting and construction timing, as well as any project scope changes that occur due to changing environmental regulations. Finally, the undersigned suggest further information in the quarterly reports to assist in the Commission’s directive for Idaho Power “to return to the Commission if viable alternatives to the Bridger Units 3 and 4 upgrades become available.” *Id.*, at 11, 13. Like Langley Gulch construction and Hells Canyon relicensing, the public interest is best served by providing transparent, timely, and complete information about ongoing, capital-intensive energy projects.

More specifically the undersigned parties respectfully request the Commission direct Idaho Power to provide the following in the quarterly reports:

1. Any changes to the compliance standards, timeline, options, and costs for environmental regulations that affect the Jim Bridger plant resulting from:
  - a. The Environmental Protection Agency’s promulgation of a final Federal Implementation Plan for Regional Haze in Wyoming.
  - b. The Environmental Protection Agency’s promulgation of draft rules for carbon regulation of existing power plants under Clean Air Act §111(d).
  - c. The Environmental Protection Agency’s or the relevant Wyoming state agency concerning coal combustion residuals or cooling water intake and discharges.
  - d. Other Clean Air Act regulations such as a nonattainment designation for any affected air shed or covered pollutant.

2. An accounting of the funds spent to date and updates on the Bridger project timeline similar to the Langley Gulch reports issued in case IPC-E-09-03.
3. Any changes to the cost, timeline, or other project components for the Bridger upgrade project covered the Certificate of Public Convenience and Necessity issued in this case.

In Order 32929, the Commission also directed Idaho Power to “return to the Commission if viable alternatives to the Bridger Units 3 and 4 become available.” *Order No 32929* at 11, 13. This ongoing evaluation is important because “it is not inconceivable that, during the installation of the SCRs, a tipping point could be reached making them uneconomic.” *Id.*, at 11. To assist the Commission, Staff, and other stakeholders the undersigned respectfully request the Commission direct Idaho Power to include the following in the quarterly report:

1. A narrative description of Idaho Power’s method and timeline for continually considering alternatives to the Bridger upgrades during the pendency of the project.
2. A quantitative analysis comparing the most up-to-date Bridger project costs to alternatives, including re-dispatching of existing, non-coal resources as well as new demand and supply side energy and capacity resources.

Procedurally the undersigned suggest the following:

1. Idaho Power should report Bridger Units 3 and 4 separately since the project has unique costs and components for each unit.
2. If Idaho Power asserts any information in the quarterly reports is confidential, the Company should so designate the specific information and provide an unredacted copy directly to the parties in this docket, subject to an ongoing protective agreement.

Idaho Power should also make a redacted copy publicly available. To foster public

education and involvement the Commission should direct Idaho Power to limit the assertion of confidentiality to the greatest extent practicable.

WHEREFORE, we respectfully request the Commission grant this petition.

DATED this 20<sup>th</sup> day of December 2013.

Respectfully submitted,

  
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Benjamin J. Otto  
*Attorney for the Idaho Conservation League*

  
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Dean J. Miller  
MCDEVITT & MILLER, LLP  
*Attorneys for Snake River Alliance*

  
\_\_\_\_\_  
Zack Waterman  
*Director – Idaho Chapter of the Sierra Club*

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December, 2013, I delivered true and correct copies of the foregoing PETITION FOR CLARIFICATION to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983

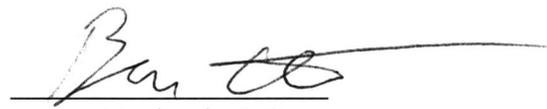
Electronic Mail Only:

Lisa D. Nordstrom  
Jennifer Reinhardt-Tessmer  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
lnordstrom@idahopower.com  
jreinhardt@idahopower.com

ck@mcdevitt-miller.com

Ken Miller  
Clean Energy Program Director  
Snake River Alliance  
Box 1731  
Boise, ID 83701  
kmiller@snakeriveralliance.org

Peter J. Richardson  
Gregory M. Adams  
Richardson & O'Leary, PLLC  
515 N. 27th Street  
Boise, ID 83702  
peter@richardsonandoleary.com  
greg@richardsonandoleary.com

  
Benjamin J. Otto

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
Telephone: (208) 342-1700  
Fax: (208) 383-0401  
dreading@mindspring.com

Dean J. Miller  
Chas. F. McDevitt  
Celeste K. Miller  
McDevitt & Miller, LLP  
P.O. Box 2564  
Boise, ID 83701  
joe@mcdevitt-miller.com  
chas@mcdevitt-miller.com