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IDAHO PUBLIC UTILITIES  
COMMISSION

Idaho Public Utilities Commission  
472 W Washington St.  
Boise, ID 83702

June 19, 2017

Re: IPC-E-16-28 Idaho Power Request for a CPCN for Wood River Valley

Dear Commissioners:

The Idaho Conservation League (ICL) recommends the Commission deny Idaho Power's request for a Certificate of Public Convenience and Necessity to build a redundant 138 kv transmission line in the Wood River Valley. We have reviewed the materials in this case, along with the Idaho Power Integrated Resource Plan and Demand Side Management reports. Based in this review, we agree with the PUC Staff the Company has not justified the need for a fully redundant 138 kv transmission line. As more fully explained below, we recommend the Commission:

1. To address reliability, grant Idaho Power authority to rebuild the existing line 138 kv, using a temporary back up line.
2. To address adequacy, direct Idaho Power to work with local stakeholders to collaboratively implement cost-effective conservation measures and other local energy security efforts.

*Reliable Service*

The current 138 kv transmission line connecting the upper Wood River Valley to the Hailey substation has an exemplary service record. ICL reviewed the record in this docket, particularly Idaho PUC Staff Witness Morrison pages 9–13 and Sierra Club Witness Heckler pages 8-12, and see the current line has experienced 5 unplanned outages ever. The major outage that occurred in the winter of 2009 was caused by a failure in a wholly different part of the electric system. The current line has the potential to continue to provide reliable service for decades ahead.

ICL acknowledges that Idaho Power has a duty to provide reliable and adequate service in a cost effective manner. Our review of the record in the case indicates the best way to meet this duty is to provide reliable service by rebuilding the existing 138 kv line and provide adequate service by working with stakeholders to implement cost effective conservation programs in the project area.

Respectfully submitted this 19<sup>th</sup> day of June 2017,

  
Benjamin J. Otto  
Idaho Conservation League

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