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From: Megan Decker <megan@renewablenw.org>
Sent: Thursday, March 19, 2015 4:19 PM
To: comment@boardmantohemingway.com
Cc: Megan Walseth Decker; Cameron Yourkowski
Subject: Renewable NW Comment - B2H DEIS
Attachments: B2H DEIS - Renewable NW Comment Letter.pdf; Untitled attachment 17462.htm

Attached please find Renewable Northwest's comment on the Bureau of Land Management's (BLM's) Draft Environmental Impact Statement (DEIS) for the Boardman to Hemingway Transmission Line Project (B2H).



B2H Project
P.O. Box 655
Vale, OR 97918

By email to: comment@boardmantohemingway.com

To Whom It May Concern:

Renewable Northwest appreciates the opportunity to comment on the Bureau of Land Management's (BLM's) Draft Environmental Impact Statement (DEIS) for the Boardman to Hemingway Transmission Line Project (B2H). Renewable NW is a diverse coalition of public interest and business groups that promotes the expansion of environmentally responsible renewable energy resources in the Pacific Northwest.

Renewable Northwest appreciates the efforts of BLM, Idaho Power Company (IDP) and countless other stakeholders to work through the challenges of the siting process to produce an alternative that minimizes the social and environmental costs of the project. Although we have no comment on the details of the preferred alternative, Renewable Northwest comments in support of B2H's benefits in driving the region toward a reliable, clean energy future. B2H could play an important part in accessing renewable energy resources and helping to limit the environmental impacts of climate change.

First, B2H will provide strong reliability benefits. B2H provides redundancy, giving utilities another choice for supply in the event of a transmission outage. The path proposed for B2H presently lacks a 500 kV transmission line, making it a significant weak point in the Northwest transmission system. B2H can serve as an important link to creating a full 500 kV loop around the four Northwest states. This loop would allow transmission system operators to access every load and generator with bulk power even while suffering a major line outage. Connection to a robust, reliable Northwest grid will bring improved energy security to customers of IDP and around the region.

Second, B2H reaches renewable energy resource zones in the Northwest that would otherwise be inaccessible, possibly allowing for the future development of renewable energy resources that can serve the region. Depending on how the available capacity of B2H is allocated by Idaho Power and its project partners, significant amounts of transmission capacity could be made available to renewable resources. We expect that the entire region may benefit from the improved transmission access for wind, solar, and other renewable resources. Expanded transmission across the region will give utilities access to geographically diverse wind and solar resources, which can improve variable resources' contribution to meeting utility peak load needs and

- 3Degrees
- American Wind Energy Association
- Atkins
- Blattner Energy
- Bonneville Environmental Foundation
- Center for Energy Efficiency & Renewable Technologies
- Christenson Electric
- Citizens' Utility Board of Oregon
- Climate Solutions
- Columbia Gorge Community College
- Community Renewable Energy Association
- DNV GL
- EDF Renewable Energy
- EDP Renewables
- Environment Oregon
- Environment Washington
- Eurus Energy America
- EverPower
- FirstWind
- GE Energy
- Geothermal Resources Council
- Green Mountain Energy
- HDR Engineering, Inc.
- Iberdrola Renewables
- Idaho Conservation League
- K&L Gates
- Kapla Law PLLC
- MAP
- Montana Environmental Information Center
- MontPIRG
- Natural Capital Partners
- Natural Resources Defense Council
- NextEra Energy Resources
- Northwest Environmental Business Council
- Northwest SEED
- NW Energy Coalition
- OneEnergy Renewables
- Oregon Solar Energy Industries Association
- Orion Renewable Energy Group LLC
- OSPIRG
- Oregon Tech
- Portland Energy Conservation, Inc.
- Principle Power
- REC Silicon
- RES America Developments
- Solar Oregon
- Stoel Rives, LLP
- SunPower Corporation
- SWCA Environmental Consultants
- Tonkon Torp LLP
- Vestas Americas
- Warm Springs Power & Water Enterprises
- Washington Environmental Council
- WashPIRG
- Western Resource Advocates

reduce the need for balancing reserves.¹

Finally, B2H provides utilities with transmission access to a liquid market that provides optionality and keeps the market's lowest cost resources available to the utilities. B2H can help utilities lower the cost of integrating variable renewable energy resources by improving access to maturing markets for within-hour flexibility. Those maturing markets include within-hour scheduling with other balancing authorities, the energy imbalance market, and other opportunities to secure low-cost balancing services from third parties.

In sum, B2H will improve reliability and regional access to markets and renewable resources, and by doing so could help mitigate the environmental impacts of climate change. Renewable Northwest encourages BLM to approve the final EIS.

Sincerely,



Megan Decker
Chief Counsel



Cameron Yourkowski
Senior Policy Manager

¹ For more information on diversity benefits, see the National Renewable Energy Laboratory's *Western Wind and Solar Integration Study*, available at <http://www.nrel.gov/wind/systemsintegration/wwsis.html>.