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From: EnviroLytical - B2H <info@envirolytical.com>
Sent: Tuesday, January 13, 2015 10:19 AM
To: comment@boardmantohemingway.com
Subject: 4487: New Communication: Boardman to Hemingway January 13, 2015 Transmission Line Project PO Box 655 Vale, OR 97918 Fall River Rural Ele

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<https://el2.envirolytical.com/communication/view/96918>
Boardman to Hemingway January 13, 2015 Transmission Line Project PO Box 655 Vale, OR 97918

Fall River Rural Electric Cooperative is a nonprofit entity serving Southeast Idaho, Montana, and Wyoming. Our utility serves 16,000 meters and the Boardman to Hemmingway (B2H) transmission line is essential to serving these members and we have an urgent need for it and are fully supportive of the line being built.

Fall River purchases over 95% of our power from BPA and having access to clean renewable hydro power. Historically, BPA and PacifiCorp participated in an agreement called the Southeast Idaho Exchange which was a very cost effective way for both BPA and PacifiCorp to serve their native loads using this agreement. PacifiCorp, under the terms of the agreement, unilaterally terminated the agreement with a 5 year notification which will occur on July 2016. The clock is ticking and BPA under contractual agreements with Fall River and several other public utilities is in need of securing a transmission pathway to serve these native loads. BPA has explored many options including new generation, new transmission lines, using existing transmission lines and based on their review the B2H line is the least cost option for providing transmission to meet its contractual obligation.

Here are some points in support of the B2H transmission line:

1. The need for B2H is urgent. BPA will incur higher costs to provide transmission services to its preference loads in Southern Idaho until the B2H line is completed.
2. Getting federal power to BPAs Idaho preference loads also gives those loads access to clean hydro power. Without B2H, these loads are more likely to be served by new or existing carbon resources such as coal.
3. It also allows you access to the robust power market, including renewable resources, from the heart of the Northwest energy system.
4. Fall River strongly urges BLM, Oregon EPA, and other impacted agencies to expedite its approval of the requested rights of way and issuance of the Final ROD so that B2H can proceed to construction and use as quickly as possible.
5. BLM developed the Longhorn Variation alternative to specifically address concerns raised by the Navy about encroachment into military airspace, to minimize effects on irrigated agriculture in the area, and to align with an existing transmission corridor. (Draft EIS page 2-54) The Longhorn Variation alternative for the Boardman terminus is the BLM preferred option. It is preferred by BLM over the other options because, according to the Draft EIS, it has fewer impacts on irrigated agriculture, vegetation, and streams and has acceptable impacts for the Navy regarding their bombing range. Although we may not agree with this assessment, we still favor this alternative.
6. We support the Longhorn Variation alternative because it allows BPA a direct connection to the B2H line, which is important in serving your loads at the lowest cost. Terminating at a PGE substation (Grassland) would add a PGE rate

pancake and require BPA to build an additional transmission line that would add more costs and complicate the transfer of power to your loads. Also, the B2H owners should, with the local utility, optimize use of new and existing right of way to minimize impacts on land owners in the area.

In conclusion, Fall River is supportive of obtaining the approvals needed to build the B2H transmission line and have some urgency to get the approvals done so the line can be built. If you have questions or need additional information, please let me know.

Sincerely,
Bryan Case
General Manager/CEO
Fall River Rural Electric Cooperative