

November 15, 2017

Members of the Utilities and Transportation Subgroup
of the Clean Energy Jobs Workgroup
Oregon State Capitol
900 Court St NE
Salem, Oregon 97301

Subject: Idaho Power Perspective on Oregon Cap and Invest Policies

Senator Lee Beyer and Members of the Utilities and Transportation Subgroup of the Clean Energy Jobs Workgroup:

Thank you for the opportunity to comment on Oregon's proposed cap-and-invest policies and programs. For more than 100 years, Idaho Power has served customers in southern Idaho and eastern Oregon with reliable, fair priced energy. Today, Idaho Power serves approximately 530,000 customers, including slightly less than 19,000 customers in Oregon. Idaho Power has worked independently to reduce its carbon footprint and serves a small customer base, which means any imposed costs associated with power production or transmission are not distributed across a large base and are more directly felt by constituents. In the past, Idaho Power has received exemptions from similar energy policies due to our unique situation in Oregon and we again believe they are reason to be exempted here from Oregon's cap-and-invest policies.

Idaho Power has internally set and achieved CO₂ emissions intensity reduction goals. Since initially setting these goals in 2010, the company has achieved a system-wide emissions intensity of 15-to-20 percent below 2005 levels – equating to a 28-percent reduction in CO₂ emissions since 2005. This was accomplished through the continual reduction of coal-fired generation, increased use of cleaner-burning natural gas and reliance on hydro generation. These steps have totaled a 44-percent reduction in coal-fired generation since 2005. In Oregon, Idaho Power will have zero carbon emissions from generation by 2020, when we cease coal-fired operations at the Boardman plant.

Idaho Power also believes that compliance with the Clean Energy Jobs Bill, Senate Bill 1070 or similar proposals, will directly increase our Oregon customers' power bills as all costs associated with compliance would be solely applied to Oregon customers. With only approximately 19,000 customers affected, increased costs due to compliance with cap-and-trade proposals would more directly impact Idaho Power's Oregon rate payers.

To maintain cost containment, flexibility and stable energy prices, Idaho Power believes that the company should be exempted from any Oregon cap-and-invest proposal.

Thank you again for allowing Idaho Power to comment on proposed cap-and-invest policies and programs. We would request that we continue to be included in the conversation and that the company can further comment throughout the bill drafting and regulatory processes.

Thank you for your public service to the State of Oregon.

Sincerely,

A handwritten signature in cursive script that reads "Tessia Park".

Tessia Park
Idaho Power Company
Vice President of Power Supply