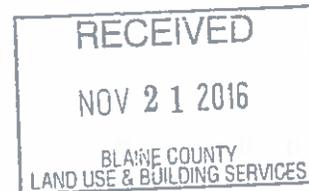


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November 20, 2016

Blaine County Planning and Zoning Commission
219 First Avenue South Suite 208
Hailey, Idaho 83333



Re: Idaho Power Redundant Line Application

Dear Commissioners:

You have already read (and heard) a substantial amount of information and comment regarding this Application. I'm sorry to add to your reading ordeal, but I believe I should share some useful context about the Wood River Electrical Plan [WREP] and the Citizen's Advisory Committee [CAC], some of which context may provide additional perspective for your deliberations.

When I was asked to be a member of the CAC in January of 2007, I sent Mike Pepper (the facilitator for the WREP and CAC) an e-mail in January of 2007. I had worked with Pepper on Master Plans for the Recreation District and other Blaine County organizations previously; he had been capable and knowledgeable.

Mike,

The *Committee* is comprised of very competent and thoughtful members. My compliments to Dan Olmstead on his choices! I would expect that most of the CAC members will come to the correct [or the least objectionable] conclusions and recommendations after listening carefully to, and examining closely, all the factual materials and rationale. I've worked with most of them during the past 20 years.

Based on my 25-year experience with Blaine County residents, before I undertake any new project I ask myself, "***Who will be opposed to the project, and why?***" Then I list the possible/probable questions and objections to see if there are reasonable answers to the questions and objections. I have done this regarding the CAC and the WREP.

- The list of residents and second-home owners who will want the new transmission line in their neighborhood or within their line-of-sight will be very short.
- The environmental folks will be concerned about visual intrusion, wildlife and bird impacts, EMF, roadless area intrusion, etc.



- Everyone will want proof that an additional line or lines are absolutely necessary; that the existing lines can't be upgraded; that there are no mechanical redundancy alternatives; that the lines can't be buried; and that someone else's ox can't be gored instead.

We have our work cut out for us!

Len

Now, ten years later, we can see there was a little bit of prophecy in my e-mail to Mike; but it was only because I had worked on two previous Idaho Power transmission line proposals, in 1987 as a Blaine County P&Z member and in 1995 as the Chairman of the Blaine County Commissioners, not because I was overly prophetic. I wasn't prophetic at all about how much there was to learn about energy generation; I'm still learning.

The 2007-2008 Process

During the first few months of meetings in 2007, the CAC developed guidelines to use for their work on the WREP:

- Increase reliability and ensure public safety
- Minimize environmental impact
- Find the least intrusive routes
- Challenge traditional energy assumptions
- A continued effort to encourage IPCO toward non-polluting renewable alternative energy sources

The CAC's first two tasks were: 1) assess the need for replacement or upgrading of the two 138 kV transmission lines that went into the Hailey Substation from the south; and 2) assess the need for a redundant line from the Hailey Substation to the Ketchum and Sun Valley Substations. After months of site visits, research, and meetings the CAC unanimously supported replacing or upgrading the two 138 kV lines coming into Hailey. There was also unanimity that the one transmission line coming out of Hailey, and going north, put the entire north valley at considerable risk if that single line should suffer an outage. Although everyone on the CAC understood the threat from the loss of the single line and the need for power redundancy, few wanted the problem solved by adding an above ground second transmission line in the Scenic Corridor. We wanted other options.

First we wanted to know if Idaho Power could provide sufficient back-up power, in case of an outage, using large diesel generators near each of the two north substations. Then we wanted to know if alternative energy sources such as wind or solar could provide adequate power back-up. As we continued our research in 2007 and 2008 we found the costs and physical space limitations of these other energy back-up alternatives were wildly unaffordable and very space constrained. The facts against using alternative energy at that time forced us to consider the redundant line solution.

Unhappily, we saw only three choices:

- **Costly** ~ under ground
- **Ugly** ~ above ground
- **Stupid** ~ do nothing

'Do nothing' was not a sensible planning choice then, and it isn't now! The potential for disaster is real; how to prevent the disaster, using some form of back-up power, is what our 2016 discussions should address; 'hoping' that we won't have an outage is not a plan.

My own background with the Mountain Overlay District and Scenic Corridor preservation guided my personal concerns about an above ground installation. The consensus of the CAC was to underground the redundant line all the way from Hailey Substation to the Ketchum/Sun Valley Substations. Most of us on the CAC were concerned with the visual impacts of placing the line above ground, although a few members were worried about the cost. The majority of the CAC held to that underground goal ... until we learned the actual difference in cost between above ground and underground installations. Idaho Power told us that the IPUC required that any community that wanted underground had to pay the difference between above- and underground cost. I personally called the IPUC and they confirmed what Idaho Power told us. I undertook to make calls verifying most of what Idaho Power told the CAC.

By this time the U.S. was deep in the Great Recession; Blaine County was trying to recover from the recent Castle Rock fire, while dealing with the full downside effects of the economic recession tragedy on resort communities.

The CAC worried in 2008 that our community could not afford the cost of undergrounding the entire line because many local mortgages were underwater, jobs had been lost, and businesses were in financial distress. We began looking at an above ground solution and trying to minimize the visual impact of the proposed redundant line. Unfortunately, above ground installation remains very visually intrusive despite all efforts to combine transmission and distribution lines and other modifications; and the need to separate the new line from the old line, and still have it accessible for repair and/or maintenance in winter conditions, made the redundant line location very visible.

A number of residents have recently expressed in your hearings on this Application a desire to have the line undergrounded from Hailey to Ketchum/Sun Valley. Many of our residents and visitors think it would be wonderful to bury all wires and eliminate all poles and towers in the Scenic Corridor; so do I. Other residents and visitors don't care (they see lines and poles everywhere they go); but if our community is willing to pay for undergrounding the entire line, I'll be happy to pay my share.

**Now for the elephant in all the Council and Commission rooms:
Solar; micro grids; battery storage.**

In 2007, this solution was too costly and required too much land. After the CAC learned the costs and the required infrastructure to make it feasible, we had to move on to more viable alternatives. However, by 2014 costs for the individual components of this *alternative energy concept* had come down substantially. Thanks to Ketchum and the efforts of some of our environmentally-concerned residents, the CAC and Idaho Power were provided studies and cost estimates that proposed alternative ways to protect the community from a power failure of the single transmission line, by utilizing a *local* back-up energy solution. Idaho Power disagreed with the cost estimates and the feasibility of depending on solar to cover a prolonged outage in the extended cold of our winters.

For the past two years the alternative energy solution has been ‘priced’ differently by advocates for “solar, micro grid, battery storage” and by Idaho Power. It has become a classic ‘she said’, ‘he said’ discussion ... so far without a mutually-agreed solution. Both Idaho Power and the alternative energy solution supporters have provided research and cost estimates to you for their preferred solutions. The P&Z has the unenviable task of sorting out the competing claims and making a decision that will be best for the entire community and its future.

I would prefer to utilize the concepts put forward by the environmentalists because I share their goal to reduce the impact of carbon sources for producing electrical energy; however, they need to prove their case that it can be done reasonably soon and less expensively than a redundant line. Undergrounding the redundant line remains my first preference if the community is willing to pay for it because that solution provides the needed power back-up and it improves the aesthetics of the Scenic Corridor.

My thanks to the P&Z Commission and staff for your work on behalf of Blaine County. I know how much time and effort is required!

Sincerely,

Len Harlig