



# Oregon

Tina Kotek, Governor



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December 20, 2023

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RE: Oregon Department of Energy Written Approval of Revised Analysis Areas under OAR 345-027-0360 for the Boardman to Hemingway Transmission Line Request for Amendment 2 (RFA2)

Dear Mr. Stippel,

On June 12, 2023, Idaho Power Company (Idaho Power or certificate holder) and the Oregon Department of Energy (Department) conducted an in-person meeting that discussed, in part, the details of preliminary Request for Amendment 2 of the Boardman to Hemingway Transmission Line Site Certificate (pRFA2) including schedule, proposed changes, analytical methods and analysis areas (pre-amendment conference).<sup>1</sup> On June 30, 2023, Idaho Power submitted pRFA2. pRFA2 seeks approval from the Energy Facility Siting Council (Council) to add area to the the site boundary/micrositing areas from 24,000 to 28,150 acres to allow adjustments in the siting of transmission line segments, temporary work areas, and new and substantially modified roads. The proposed site boundary/micrositing area additions include 12 transmission line alternatives and approximately 37 miles of road alternative locations.

On December 7, 2023, certificate holder submitted a letter to the Department requesting that pRFA2 include additional site boundary changes (i.e., expansion of the site boundary to 0.5 mile in width, consistent with Council's definition of a "corridor" for transmission lines).<sup>2</sup> On December 15, 2023, certificate holder submitted the revised pRFA2. The revised pRFA2 seeks to distinguish micrositing areas/corridors approved in the ASC and RFA1 and proposed in pRFA2 from the expanded site boundary, in the same manner allowed for many certificate holders, whereby the site boundary extends beyond areas fully evaluated for facility infrastructure siting (micrositing corridors/areas). Based on this approach, as authorized under OAR 345-027-0360(3), the Department defines the analysis areas in a manner that does not expand the analysis areas that extend beyond the site boundary (see Attachment 1 Table 1 for clarification).

Analysis areas are defined under OAR 345-001-0010(1); the definition refers to study areas designated in OAR 345-001-0010(35), which identify areas to be evaluated within and extending from the site

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<sup>1</sup> B2HAMD2 Pre Amendment Conference Coordination 2023-03-2023 and 2023-06-12.

<sup>2</sup> December 07, 2023 intent cover letter indicated that, "IPC will not request to expand the site boundary in some areas where IPC deems it unnecessary." These areas must be evident in facility mapsets and summarized in the revised pRFA2.

boundary. The proposed expanded site boundary is not intended to authorize siting of infrastructure in areas not fully evaluated. However, it is intended to allow a level of flexibility should additional siting changes arise during ongoing landowner consultation and final design. Attachment 1 Table 1 provides the Department's amended analysis areas for each standard reviewed in RFA2.

Idaho Power's pRFA2 cover letter, this written approval letter, and the revised pRFA2 will be posted on the Department's project webpage. Please contact me with any questions.

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CC (via e-mail): Todd Cornett, Division Administrator - Oregon Department of Energy  
Sarah Esterson, Senior Policy Advisor - Oregon Department of Energy  
Patrick Rowe, Assistant Attorney General - Oregon Department of Justice

**Attachment 1:**

**Revised Analysis Areas under OAR 345-027-0360 for the Boardman to Hemingway Transmission Line**

<b>Affected Standard or Resource</b>	<b>Exhibit or RFA Section</b>	<b>Analysis Areas for ASC/RFA1</b>	<b>Analysis Areas for RFA2</b>
Structural Standard	Exh. H	The area within the site boundary.	The area within the site boundary.
Soil Protection	Exh. I	The area within the site boundary.	The area within the site boundary.
Wetlands	Exh. J	The area within the site boundary.	The area within the site boundary.
Land Use	Exh. K	The area within and extending ½-mile from the site boundary.	The area within and extending ¼ -mile from the site boundary.
Protected Areas	Exh. L	The area within and extending 20-miles from the site boundary, including areas outside the state if applicable to the Council's standard.	The area within and extending 19.75-miles from the site boundary, including areas outside the state if applicable to the Council's standard
Fish and Wildlife Habitat	Exh. P	The area within the site boundary.	The area within the site boundary.
Threatened and Endangered Species	Exh. Q	The area within and extending ½-mile from the site boundary.	The area within and extending ¼ -mile from the site boundary.
Scenic Resources	Exh. R	The area within and extending 10-miles from the site boundary.	The area within and extending 9.75-miles from the site boundary.
Historic, Cultural and Archaeological Resources	Exh. S	The area within the site boundary.	The area within the site boundary
Recreational Opportunities	Exh. T	The area within and extending 2-miles from the site boundary.	The area within and extending 1.75-miles from the site boundary.
Public Service	Exh. U	The area within and extending 10-miles from the site boundary.	The area within and extending 9.75-miles from the site boundary.
Wildfire Prevention and Risk Mitigation	Exhibit V	The area within and extending ½ mile from the site boundary (RFA1).	The area within and extending ¼ mile from the site boundary.
Noise	Exh. Y	The area within and extending ½-mile from the site boundary.	The area within and extending ¼ -mile from the site boundary.
Electric Transmission Lines	Exh. AA and DD	The area within the site boundary.	The area within the site boundary.