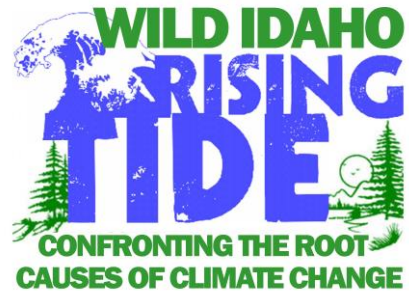


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July 31, 2026

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Sent electronically through the Idaho Public Utilities Commission (PUC) case comment or question form, as an organizational response intended for Idaho PUC review, consideration, and public website posting

**WIRT Comments on Idaho Power Company Application for
Certificates of Public Convenience & Necessity for
Peregrine & South Hills Gas Power Plants, Case IPC-E-26-04**

Filed for the official public record of Idaho Power Company's (IPC) application to the Idaho Public Utilities Commission (PUC) on March 11, 2026, for Certificates of Public Convenience and Necessity (utility case number IPC-E-26-04), to invest in and construct the Peregrine and South Hills "natural" gas (methane) power plants in southern Idaho, respectively by June 2029 and June 2030, and as upheld by Idaho Code § 74-101 (13), I respectfully offer these written comments and accompanying information on behalf of Wild Idaho Rising Tide (WIRT) and its over 3,000 climate activists, members, friends, supporters, and allies, as citizens of Idaho, Montana, Oregon, Washington, and other U.S. states, who work, reside, and/or own property and/or businesses in and beyond the Idaho Power Company service area and the lands, air sheds, rivers, and surrounding and downstream aquifers and watersheds that IPC's Peregrine and South Hills methane gas power plants application, PUC certificates approval, and infrastructure construction and operation would directly impact [1-5]. We object to Idaho Power Company's project invasion and its significant, cumulative impacts on affected communities, critical ecosystems, public air, water, land, and resources, and private land and water sources within the tributaries, floodplains, and banks of the Snake and Boise Rivers, as insufficiently *publicly* identified and analyzed in IPC's certificates application for case number IPC-E-26-04, and in pertinent utility, government, and intervenor documents and accompanying notices offering limited public information, via the Idaho PUC and IPC website pages.

Thousands of regional WIRT associates, including hundreds of Idaho Power Company

customers, also object to this IPC project's significant, cumulative, direct and indirect, adverse impacts on climate change, endangered species, cultural resources, socioeconomic and environmental factors, and reasonable public needs including human and environmental health and safety, drinking and agricultural water, and private property values, rights, uses, enjoyment, and insurability. As further public input and information shared with the Idaho PUC, we incorporate by reference, into this letter of resistance to PUC approval of certificates for these methane gas plants, the written and oral comments and linked articles and documents of WIRT and all persons, organizations, and intervenors raising oppositional concerns about this venture and its applications, certificates, and procedures relevant to project analyses, presented through all local, state, and federal public processes before, during, and after potential IPC construction and operation activities of the South Hills and Peregrine "natural" gas power plants.

WIRT Perspective on Case IPC-E-26-04 Background

In mid-March 2026, Idaho Power Company (IPC) applied to the Idaho Public Utilities Commission (PUC) for Certificates of Public Convenience and Necessity (case number IPC-E-26-04), to invest in and construct two new methane gas power plants and accordingly facilitate extra gas pipeline capacity in southern Idaho over the next few years [1-5]. IPC proposes to build the South Hills plant on the Snake River near Milner, Idaho, to generate 222 total megawatts of electricity from 12 reciprocating engines by June 2029, and the Peregrine plant between Boise and Mountain Home, to produce 430 megawatts from one massive, single-cycle combustion turbine by June 2030. IPC claims that it needs to make investments now in these resources, to meet peak demands beyond its adequate, existing system, and due to the long lead times required to obtain gas generation equipment and additional pipeline capacity. The company forecasts rapid load growth from committed industrial sites and predicted large-load users.

As the initial, formal step for any utility seeking approval for new infrastructure, IPC is requesting PUC permission to begin accounting for its spending on these gas plants. If or when it brings these projects online, IPC will engage another PUC process to recover project costs from its customers. In the present case, Northwest Energy Coalition and Renewable Northwest have intervened in opposition, while large-load users Idaho Irrigation Pumpers Association and computer memory and data storage manufacturer Micron Technology as well as PUC staff represent various interests [6]. Spring 2026 WIRT searches yielded little public information about these power plants, beyond the PUC and IPC websites and industry articles.

Predictably, with most of the climate-wrecking schemes of the oil and gas industry and its utility enablers, these facilities may manifest the covertly planned destinations for the 80 percent of additional Gas Transmission Northwest (GTN) pipeline methane pushed by TC Energy through the GTN Xpress expansion toward Idaho, and/or for the products of two Snake River Oil and Gas wells drilled near the Payette River, the Fruitland city water intake plant, and a dense residential/business area in June and July 2026. Owner of the other interconnected, regional, methane pipeline network, Williams Companies announced in May 2026 the proposed Silver Spur expansion of its Northwest pipeline system from Opal, Wyoming, toward the Northwest, the first phase of its Rockies Columbia Connector ambitions to add a 90-mile transmission line into Idaho, which could impose 275 million cubic feet per day of methane by early 2030 [7].

Climate activists collective Wild Idaho Rising Tide (WIRT) noticed these developments in April 2026 and has been sharing news, articles, and reflections about the proposed South Hills and Peregrine methane power plants on our weekly *Climate Justice Forum* radio program, broadcast for fourteen years on progressive, volunteer, community station KRFP Radio Free Moscow [8, 9]. Throughout the last year and over decades, we also continue to offer public process and direct action support to frontline, Payette County residents opposed to riverside and residential area gas well drilling. This spring, we were further shocked to learn that a third methane power plant slipped under the Boise resistance radar, as the PUC permitted expansion of the Bennett Mountain plant in Mountain Home. WIRT hopes that all of these overbuilds of soon outdated and defunct fossil fuels infrastructure in the Idaho high desert do not fuel more remote data centers dreams or distant, urban electrification of utilities and transportation.

In late May 2026, WIRT alerted the Stop Northwest Gas Expansion (SNGE) coalition about Idaho Power Company's two-plant proposal, discussed the situation during our meetings, and suggested inviting attorney Ben Otto, the senior policy associate with the Northwest Energy Coalition, to talk with us about this PUC quasi-judicial proceeding, so SNGE coalition member organizations could more actively oppose this (yet another!) Idaho fossil fuels invasion [10, 11]. After contacting Ben, forwarding conversations to SNGE co-workers, and urging further organizer arrangements, Ben joined a regular coalition meeting on Thursday, July 23, and provided an extensive presentation. Topics covered the two proposed, southern Idaho, gas power plants, insights on PUC decision-making criteria, and best practices for public input from citizens and organizations.

To raise broad Northwest awareness, outreach, and action against this Idaho Power Company proposal, SNGE posted a recording and slides of Ben's presentation and question-and-answer session [12, 13]. WIRT features this discussion on the Wednesday, July 29, *Climate Justice Forum* show, between 1:30 and 3 pm Pacific time, on-air at 90.3 FM and online and archived for two weeks on KRFP [8]. On all of our broadcasts, thanks to generous, anonymous listeners, we typically describe continent-wide, grassroots, frontline resistance to fossil fuels projects, the root causes of climate change. WIRT and the Stop Northwest Gas Expansion coalition greatly appreciate and support through our efforts the ongoing, important work of Northwest Energy Coalition and Renewable Northwest, to represent the best interests of Idahoans and Northwesterners to the Idaho PUC. We have encouraged Idaho Power Company customers and their WIRT and regional allies to email these organizations with their questions and to comment to the PUC, on this utility case number IPC-E-26-04.

WIRT Comments on Case IPC-E-26-04

WIRT earnestly urges the Idaho Public Utilities Commission to: 1) Include in the public record for Idaho Power Company's application for Certificates of Public Convenience and Necessity (case number IPC-E-26-04) and for related project comment periods these and all of our written objections and linked citations enclosed in these WIRT comments; 2) Expand public involvement beyond utility case intervenors, impacted IPC customers, and commenters considering this gas power plant application; 3) Conduct open, public hearings and concurrent, extended comment periods among the concerned communities most affected by this IPC

proposal and its application and relevant previous, current, and potential stakeholder processes, litigation, and state decisions; 4) Better assess the regional significance, scope, and precedence of the hazardedly located Peregrine and especially South Hills methane gas power plants in southern Idaho, through a revised, more transparent and explicit, IPC certificates application, and associated public input processes; 5) Perform a community-preferred, scientifically rigorous, independent, unbiased, full environmental study and baseline, adjacent water and air quality testing examining this controversial project; and 6) Delay and deny this unnecessary and harmful, fossil fuel infrastructure expansion and consequent exploitation of private and public resources.

WIRT has encouraged and documented public participation in comments and testimony for this IPC certificates application, by sending and posting issue alerts and recording and broadcasting the passionate input provided by concerned intervenors [14, 15]. Besides this outreach, WIRT offers these formal remarks drawn from our 16 years of experience, knowledge, and direct interests in this and previous, related, fossil fuels infrastructure applications and successful legal challenges considered at state hearings and in federal courts. This letter of objection to Idaho Power Company methane power plants also arises from detailed suggestions and guides for possible responses, provided by our colleagues of Northwest Energy Coalition, Renewable Northwest, the Idaho Chapter of the Sierra Club, and the Stop Northwest Gas Expansion coalition and project-impacted IPC customers. We fully support and incorporate by reference into these comments these parties' resistance to IPC's Peregrine and South Hills gas power plants, which continues to legally bind proposed and potentially permitted IPC certificate applications. Together, we have identified the following, described problems with this Idaho Power Company application, deliberated through case number IPC-E-26-04, which does not adequately evaluate the risks of these power plants to the surrounding community of life.

* Although the Idaho Public Utilities Commission is accepting written comments until July 31, 2026, it has not currently scheduled a public hearing on this matter. WIRT respectfully asks for one or more planned public hearings and a concurrent extension of this comment period, due to the typical, summer vacation travel, agricultural pursuits, and consequent unavailability of the southern Idaho and eastern Oregon public most essential to participation in this seminal PUC case. We understand that if enough Idaho Power Company customers, including the hundreds of WIRT members represented in these comments, request these hearings and extensions, the PUC could host both appreciated opportunities for further public input on this IPC proposal.

* In its decisions, the PUC is primarily concerned with assessing the necessity and public costs of these Idaho Power Company projects. Has IPC provided verifiable proof to the PUC of the utility's need for more gas resources? Does the seemingly excessive scale and scope of these methane power plants fit IPC customer energy needs in the most cost-effective and reliable ways to achieve demand balances? Most significantly, how does IPC intend to finance this proposal? Idaho Power Company has not publicly disclosed the huge costs of these projects or their probably cheaper alternatives.

* As IPC stated in other documents, some of its forecasted power needs for these gas plants speculates that new customers will arrive and that new large-load users will pay for the infrastructure and resources that they require. IPC and/or big electricity users -- not later, Idaho

Power Company, residential and small business customers -- should carry the risk of investing in projects that may prove unnecessary, if new demands do not materialize.

* IPC's gas power plant scheme imposes multiple risks on Idaho customers, which neither the PUC nor Idaho Power Company have adequately, directly analyzed. International conflicts and economies cause fluctuating methane prices and could inflict rising costs on later IPC customers, raising serious questions about the cost-effectiveness of gas. Because the regional methane pipeline network is currently running full, IPC must depend on outside actors TC Energy and specifically Williams Companies, to build and/or expand pipelines into Idaho, to supply its proposed plants. Of most concern, pipelines, compressors, and structures with volatile gas chemicals could explode, and they routinely release dangerous emissions that pollute local air and water quality and communities and damage the global climate.

* IPC's Peregrine and South Hills methane power plants encourage construction and expansions of pipelines to precariously carry gas from the regional Williams Northwest and GTN transmission lines, under and near public infrastructure and rivers and private structures in various locations across the Northwest, threatening leaks, accidents, and wildfires along pipelines, at compressor stations, and within these and other gas plants, which could contaminate river and irrigation canal water, underground aquifers, private and municipal water supplies and facilities, and the farms, ranches, and their products reliant on clean water sourced from wells, canals, and rivers for irrigation.

* This IPC power plant proposal recklessly endangers Idahoans and their economies and rights, with the senseless rush by Idaho utilities and regulators to push fossil fuel infrastructure development, which could result in more costs than benefits to Idaho Power Company customers and all Idahoans, especially during the current, worldwide, oil and gas struggles and historically high oil and gas prices, which could together force less expensive, irresponsible, IPC business practices that threaten public and environmental health and safety and pollute water, air, and soil.

* In this IPC certificate application, Idaho Power Company and the PUC have not properly examined these power plant projects or considered available, alternative, clean energy options for sufficient and affordable fuel supplies. This IPC proposal has also not undergone the necessary scrutiny of a full Request for Proposals and biannual Integrated Resource Plan processes. In previous resource plans, IPC showed that batteries could meet the peak electricity demands that it claims it needs these methane power plants to fulfill. But the company has since asserted that batteries are no longer cost-effective, despite federal tax incentives that reduce expenses. Instead of gambling on gas plants during an accelerating energy transition away from them, IPC, like other regional utilities successfully adapting to customer demands, could increase investments in implementing peak load solutions such as improved customer energy efficiency and demand flexibility, rooftop solar electricity generation, and battery power storage.

WIRT Request for Idaho PUC Denial of IPC Certificates Application, Case IPC-E-26-04

As the Idaho citizens who employ the Idaho Public Utilities Commission, Wild Idaho Rising Tide members expect state agency staff to uphold the well-being of Idaho air, waters, lands, wildlife, residents, and natural/economic resources, over the profit-driven motives of the private

oil and gas industry and Idaho Power Company's conflicting interests in revenues from reckless corporate pursuits reliant on Idaho PUC certificates approval, like IPC's application to invest in, build, and run the Peregrine and South Hills "natural" gas (methane) power plants in southern Idaho. The plans and practices scarcely publicly outlined in this proposal ignore and jeopardize the clean water and air and environmental and human health and safety, not to mention the economic vitality, that predicate Idahoans' cherished quality of life. State agency decisions and officials paid to serve the public's best interests should not compromise Idaho laws and rules to accommodate corporate and industry greed. If this regulatory agency approves these certificates, it should at least insist that Idaho Power Company bears the risks of this infrastructure soon becoming cost-ineffective, stranded assets possibly lacking access to inexpensive gas or any fuel.

Along with growing public outrage, opposition, and pressure against these risky gas plant ventures, WIRT will continue to encourage and build resistance across the state, through ongoing, regional presentations and demonstrations, to relentlessly thwart and halt this and further fossil fuel infrastructure invasions, especially in reaction to obviously dangerous methane gas power plant construction and operation near essential water courses and public assets along the Snake River, impacting thousands of farms, ranches, businesses, and homes in the vicinity and downstream. We ardently request Idaho PUC denial of certificates for the IPC-E-26-04 case application, for the previously stated and other commenters' reasons.

In accordance with current State of Idaho rules governing IPC-E-26-04 case proceedings, and considering the inadequacies of public disclosure of Idaho Power Company's application for Certificates of Public Convenience and Necessity and the aforementioned and other possible, significant impacts on fresh water supplies, natural resources, public and private infrastructure, and associated health, social, and economic conditions, we strongly request that the Idaho PUC responsibly address the concerns and issues raised in these WIRT comments. For the public record, Wild Idaho Rising Tide asks that the Idaho PUC reject or at least require revision and extended public review of this IPC certificates application, to ensure the best stewardship of Idaho's priceless and irreplaceable, public and private resources, which IPC mismanagement could significantly alter and jeopardize.

WIRT recommends that the Idaho Public Utilities Commission require additional, publicly accessible, impact evaluations through a revised, IPC certificates application, a full Request for Proposals, and as part of Integrated Resource Plan processes, all responsive to herein requested, extended public comment periods and public hearing input. During this decisive, IPC project review phase, we ask that the Idaho PUC graciously consider and act in accordance with our and our colleagues' letters and filings of objection, which substantively address the deficiencies of IPC documents and processes, as we offer the counterbalance of regional insights so crucial to government and community protection of economies and water and air sheds essential to lives and livelihoods. Thank you for accepting our comments on IPC's application for Certificates of Public Convenience and Necessity (case number IPC-E-26-04) for the Peregrine and South Hills methane power plants. We intend both to improve IPC applications and to advocate for justifiably anticipated State of Idaho rejection of this IPC scheme to further inflict economic, health, and safety risks on Idahoans, while reaping the benefits of southern Idaho "natural" gas and IPC customer exploitation.

With great concern for our fellow citizens and shared economies and natural resources in Idaho, WIRT appreciates your consideration of these comments and your responses and actions in congruence with them,

/s/ Helen Yost, MSEE
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[1] *Idaho Power Company -- Application for Certificates of Public Convenience and Necessity for the South Hills and Peregrine Power Plants and for an Associated Accounting Order*, March 11, 2026 Idaho Public Utilities Commission
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[3] *Idaho Power Wants to Build Two Natural Gas Power Plants. Here's Where and Why*, May 7, 2026 Idaho Statesman
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[4] *Peregrine Energy Center -- Proposed Site*, 2026 Idaho Power Company
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[5] *South Hills Power Plant*, 2026 Idaho Power Company
<https://www.idahopower.com/energy-environment/energy/energy-sources/natural-gas/south-hills-gas-plant>

[6] *Micron's Plans to Bring Leading-Edge Memory Manufacturing to Idaho*, 2026 Micron
<https://www.micron.com/us-expansion/id>

[7] *Quarter 1 Earnings Recap: Data Centers Accelerate New Growth Paths for Williams*, May 5, 2026 Williams Companies
<https://www.williams.com/2026/05/05/q1-earnings-recap-data-centers-accelerate-new-growth-paths-for-williams>

[8] *KRFP Radio Free Moscow*
<http://radiofreemoscow.org>

[9] *Wild Idaho Rising Tide on AudioPort*
<https://audioport.org/index.php?op=producer-info&uid=3075>

[10] *Northwest Energy Coalition* advances clean, equitable, and affordable energy policies by leveraging our analytic expertise and convening a broad alliance of people and organizations.
<https://nwenergy.org>

[11] *Stop Northwest Gas Expansion Coalition* protects our communities in Idaho, Oregon, and Washington from the health, safety, and climate threats of methane gas. We are an alliance of public health, faith, and environmental organizations as well as community members committed to: 1) exposing the truth about the harms to our health and safety caused by toxic and explosive “natural” gas, 2) stopping the expansion of gas supply, including increases in gas pipeline pressure, to prevent harm, 3) uniting impacted communities to hold industry and government accountable.
<https://www.stopgas.org>

[12] *Northwest Energy Coalition on Idaho Power Company Gas Plants*, July 23, 2026 Stop Northwest Gas Expansion Coalition (online presentation recording)
<https://drive.google.com/file/d/135XYM19MaecWjdq3Sv1YKLLHvrcvyLpj/view>

[13] *Idaho Power Application for New Gas Generation*, July 23, 2026 Northwest Energy Coalition (online presentation slides)
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[14] *Oppose Two New Idaho Methane-Powered Plants by July 31*, July 29, 2026 Wild Idaho Rising Tide
<https://wildidahorisingtide.org/2026/07/29/oppose-two-new-idaho-methane-powered-plants-by-july-31>

[15] *Case Comment or Question Form*, 2026 Idaho Public Utilities Commission
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