Milner Gas Power Plant (Idaho Power's South Hills): Expanded Briefing

Research file. Status as of November 19, 2026, 5 a.m. Mountain.

Quick answers

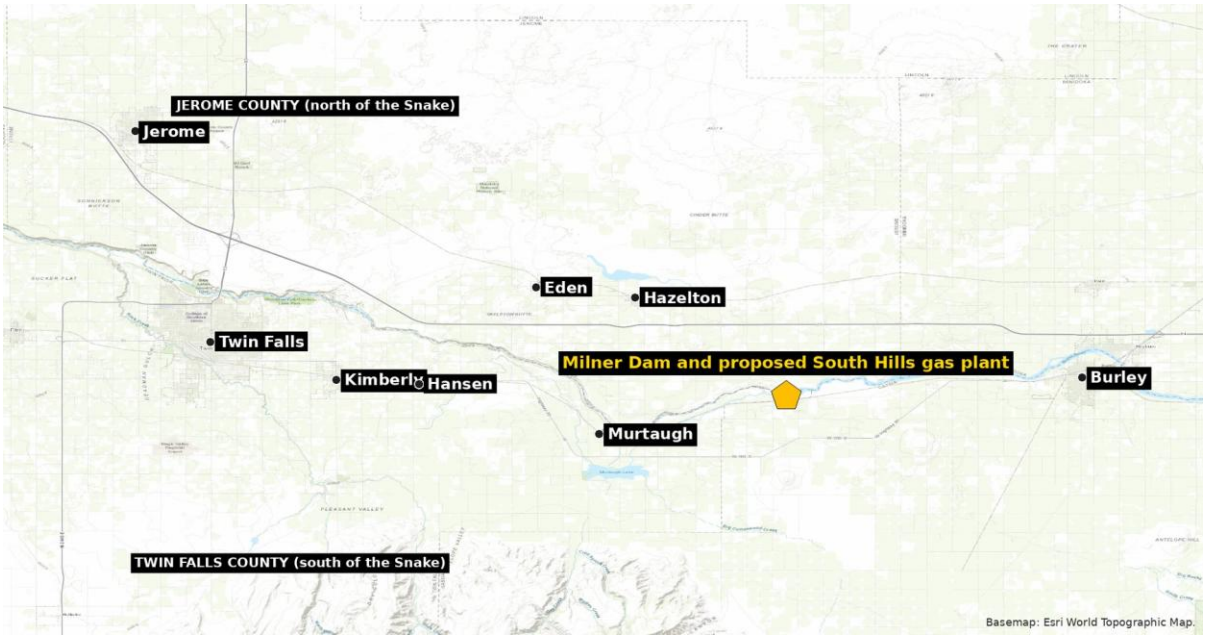
Question	Answer, as of Nov. 19, 2026, 5 a.m. Mountain
What is it?	A 222 MW natural gas plant, twelve reciprocating engines in two engine halls, on about 20 acres next to Milner Dam on the south bank of the Snake River in eastern Twin Falls County. Idaho Power calls it the South Hills Power Plant. Inside the company it was "Milner." Target online date June 1, 2029.
Has the PUC approved it?	No. The case page for IPC-E-26-04 still shows no final order, last updated Oct. 2. The only filing since is Jeff A. Pierson's public comment, posted Nov. 17. The commissioners deliberated privately Oct. 6.
Is there a deadline for a decision?	None in the record. Idaho Power didn't ask for one and Order 37048 set none. Idaho Power plans to file the county building permit in December 2026 and start site prep in January 2027.
Is the PUC comment period open?	No. It closed July 31, 2026, and the record closed with Idaho Power's Aug. 14 reply. After the final order, any interested person has 21 days to petition for reconsideration (Idaho Code 61-626).
Who holds the land?	Idaho Power, as of May 18, 2026. Twin Falls County approved lot line adjustment Z2026-0001, moving 19.877 acres from SJA Land Co LLC's field (RP10S21E296020) into Idaho Power's adjoining river parcel (RP10S21E296010). Idaho Power applied Jan. 2, 2026, ten weeks before it filed at the PUC. What it paid isn't public.
Is the air permit in?	Not that the public can see. Idaho Power's page says it "is in the process of obtaining an air quality permit" and that DEQ would issue it "before the plant begins operating." Its Bennett Mountain page says the same kind of permit "must be approved before construction can move forward." DEQ hasn't posted a South Hills notice.
Is it on public land?	No. Federal parcels lie nearby but not under the site. A 0.1182-acre corner of the fenced yard sits inside the federal hydro license boundary for Milner Dam, on land Idaho Power owns.
Was an RFP required?	Yes, by Commission order. Oregon's bidding rules applied from 2013 (Order 32745) until Jan. 2, 2026. Idaho's own rules (Order 36898) applied after that, with a formal waiver as the only way around them. Idaho Power filed March 10, 2026 with no waiver. It argues the new order doesn't reach an RFP it began in 2024.
How did a battery become a gas plant?	Idaho Power's own bid team entered a 60 MW battery at Milner in its 2024 RFP. After scoring and after Oregon acknowledged the shortlist, the bid came back in October 2025 as a 222 MW gas plant. PUC Staff says the company "effectively bypassed the entire RFP selection process" and still recommends approval with a hard cost cap.
Will the county hold a hearing?	Not on the current path. Idaho Power says "power generation is a permitted use at the proposed site." On Aug. 26, 2026 the commissioners re-adopted the Agricultural Zone's permitted-use list with "Public utility buildings and facilities" on it (Ordinance 294). No written county determination for this site has been found in 1,207 county PDFs.

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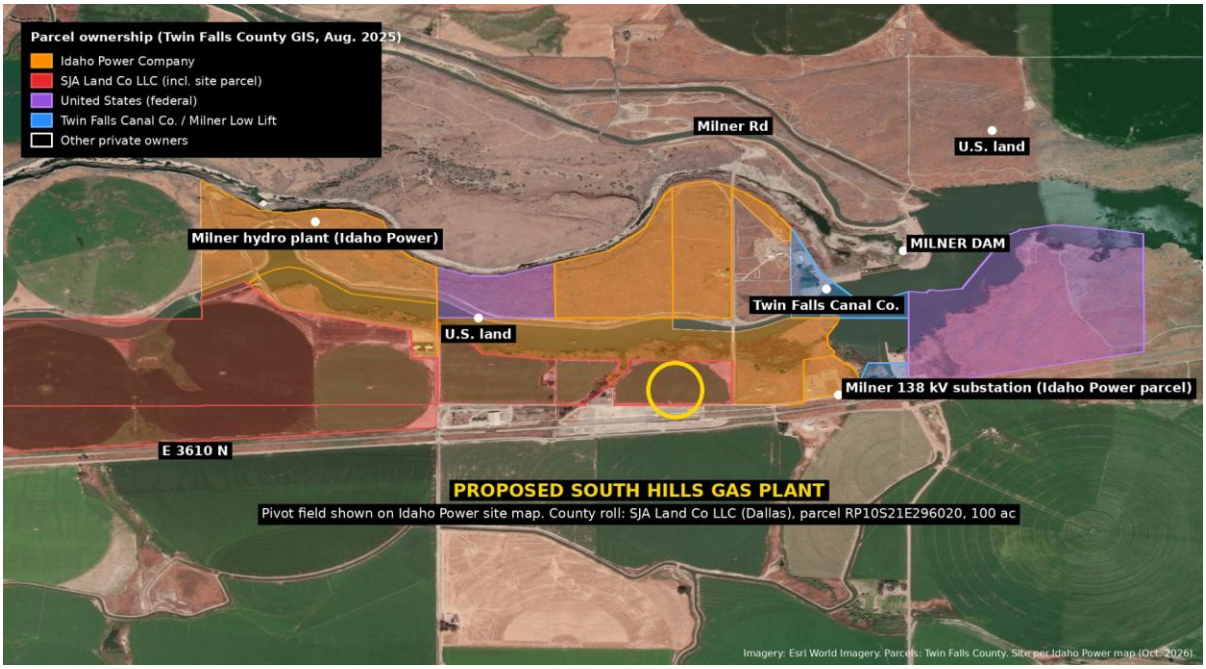
Question	Answer, as of Nov. 19, 2026, 5 a.m. Mountain
Did Peregrine get a hearing?	Yes. Idaho Power's other new gas plant, in Elmore County, needed a conditional use permit. It got neighborhood meetings, a Planning and Zoning hearing on Apr. 2, 2026 and two county board variance hearings on May 15, 2026.
Is FERC involved?	At the edges. Idaho Power and Milner Dam, Inc. asked FERC on Sept. 8, 2026 to take 0.1182 acres out of the Milner hydro boundary for the plant's yard (P-2899-157). No notice or order has posted. FERC is also scoping Williams' Silver Spur gas pipeline into Twin Falls County (PF26-15).
Where does the gas come from?	Existing Northwest Pipeline capacity, which Idaho Power says won't cover both new plants at certain times of year. NGI reports Idaho Power signed precedent agreements for 175,000 Dth/d on Silver Spur, which isn't due until the second quarter of 2030, a year after the plant.
What does it cost?	Not public. The estimate is redacted in every filing. Staff wants a hard cap at the July 16, 2026 estimate. The South Hills EPC contract was still being negotiated on Oct. 29.
Who is it for?	Staff says large customers are 88 percent of system growth from 2026 to 2030. On the Oct. 29 earnings call an Idaho Power executive said residential is "right around a percent" of the growth. Idaho Power's local pitch was Magic Valley customers.
Did the PUC just set conditions on another Idaho Power project?	Yes. Final Order 37231 (Nov. 18, 2026) granted the Gateway West Segment E-8 certificates with a confidential soft cost cap, a duty to "fully capture and distinctly tag" all costs, and confidential quarterly forecasts of new load "regardless of the size of the load and if there is a signed agreement in place or not." Watch for the same conditions on South Hills.
Where can the public still weigh in?	FERC eComment on P-2899-157 any time. Silver Spur scoping sessions Dec. 8 (Wells, Nev.) and Dec. 9 (Twin Falls), comments due Dec. 14. Large-load cost case IPC-E-26-07, comments due Dec. 14. Chobani contract IPC-E-26-19, comments due Dec. 17. The DEQ air permit, when it's noticed. Reconsideration within 21 days of the South Hills final order.

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Maps and images



Locator map. Milner Dam sits on the Snake River between Murtaugh and Burley. The plant site is on the south bank, in Twin Falls County. Basemap: Esri.



Parcel ownership at the site from the Twin Falls County GIS roll (August 2025). The yellow circle marks the field Idaho Power circled on its own site map. Imagery: Esri World Imagery.

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Idaho Power's site map, posted to its South Hills project page in October 2026.



Idaho Power rendering of the plant: two engine halls, twelve exhaust stacks, and two switchyards. Idaho Power says actual appearance is subject to change.

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Idaho Power's own project timeline graphic, dated Oct. 20, 2026.

Bottom line

The live project at Milner is Idaho Power's South Hills Power Plant: twelve natural gas reciprocating engines, up to 222 MW, on 20 acres at Milner Road and E 3610 N in eastern Twin Falls County, just west of the Milner 138 kV substation. Idaho Power wants it running June 1, 2029.

It rides with the 430 MW Peregrine plant in Elmore County in one PUC case, IPC-E-26-04. The record closed Aug. 14. The commissioners deliberated privately Oct. 6. No final order has posted.

The project began as a 60 MW battery bid. After the bid deadline, after scoring and after Oregon acknowledged the shortlist, Idaho Power's own bid team swapped it for the 222 MW gas plant and renamed it South Hills. Staff calls that a bypass of the RFP and still recommends approval with a hard cost cap. Peregrine never went through an RFP at all.

Money moved before any approval: turbine and engine deposits, equipment supply agreements for all three of Idaho Power's new gas plants, about $1.6 billion in fuel-related agreements starting May 2030, and a request to start construction interest in December 2025.

Idaho Power quietly assembled the site in the first half of 2026. It applied Jan. 2 for a lot line adjustment that moved 19.877 acres of SJA Land Co's field into its own river parcel. The county approved it May 18. The P&Z agenda listed it with no location.

No public hearing on the plant has happened anywhere. The PUC used written comments and never ruled on a hearing request. The county treats it as a permitted utility facility and needs only a building permit, while every solar array in the county needs a conditional use permit and a hearing. FERC hasn't noticed the boundary change. The DEQ air permit is the last formal comment window. Idaho Power says it "is in the process of obtaining" that permit. DEQ hasn't posted anything for comment.

The need is driven mainly by large industrial and data center load. The cost-of-service case that decides who pays, IPC-E-26-07, goes to hearing Jan. 19 to 21, 2027.

Nothing reviewed shows bribery, fraud, a false filing or construction without a permit. The concerns are about process, candor and who carries the cost.

South Hills at a glance

Item	Detail
Owner/builder	Idaho Power Company (self-build, utility owned, earns a return if placed in rate base)
Former name	"Milner" benchmark bid, renamed South Hills (Hackett direct testimony, p. 27)

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Item	Detail
Location	Idaho Power's map circles the pivot field west of Milner Road and north of E 3610 N, south bank of the Snake River, just west of the Milner 138 kV substation. Murtaugh mailing area. Idaho Power's description says Milner Road and "5200 N E Road"; no road by that exact name shows on county maps. Milner hydro powerhouse is at 3625 N 5200 E.
Land	Idaho Power, through lot line adjustment Z2026-0001 (applied Jan. 2, final May 18, 2026): 19.877 acres moved from SJA Land Co LLC's field (RP10S21E296020) into Idaho Power's river parcel (RP10S21E296010). Price not public. Not federal or state land.
Footprint	20-acre parcel; two engine halls with six engines each
Technology	12 Wärtsilä reciprocating internal combustion engines, same supplier as the Bennett Mountain gas expansion. Full output in under five minutes.
Capacity	Up to 222 MW nameplate (Idaho Power web page once said 220 MW)
Comparison	Milner hydro is 59.5 MW nameplate, about 45 MW summer
Target online date	June 1, 2029. Queue #798 lists May 1, 2029; a Nov. 5, 2026 Material Modification Assessment kept the request alive and may fold it into Idaho Power's Cluster 2 study
Construction	Site prep January 2027, construction March 2027 per Idaho Power schedule
Cost	Not public. Staff cites a July 16, 2026 estimate, redacted. EPC contract still under negotiation Oct. 29, 2026. Staff found EPC agreements cover only part of project value
Fuel	Existing Northwest Pipeline capacity, which Idaho Power says won't cover both new plants "at certain times of the year." NGI reports 175,000 Dth/d for Idaho Power on Silver Spur, due second quarter 2030
Water	Idaho Power says about what two average homes use; air-cooled closed-loop radiators
Stacks	Idaho Power says comparable in height to nearby transmission towers and grain silos
Noise	Final design not done; company promises "noise-reduction measures," no numbers
Air permit	Idaho DEQ Permit to Construct required; Idaho Power says it is "in the process" of obtaining it. No draft permit or comment period found.
County permit	Building permit only, per Idaho Power ("power generation is a permitted use at the proposed site"). Ordinance 294 (Aug. 26, 2026) lists "Public utility buildings and facilities" as a permitted Agricultural use. Site zone unconfirmed. Planned filing December 2026
Idaho Power contact	Nate Murray, nmurray@idahopower.com
Water permit	Idaho Power says it needs a well permit from the Idaho Department of Water Resources (per a parallel research catalog)

Who owns the site

Update, Nov. 18, 2026. Idaho Power now holds the site. Twin Falls County's permit portal shows lot line adjustment Z2026-0001, a commercial lot line adjustment at 5226 E 3610 N, Murtaugh. Idaho Power applied Jan. 2, 2026. The county finalized it May 18, 2026. The work description reads: "Lot Line Adjustment to adjust 19.877 acres RP10S21E296020 is 54.117 acres - will be 34.240 acres (SJA Land) RP10S21E296010 is 68.89 acres - will be 88.767 acres (ID Power)." Owners listed: Idaho Power Company and SJA Land Co LLC. Fee $400, paid. The county page lists four attachments not yet pulled: an approval letter, minutes, Idaho Power's written decision and a staff report.

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So 19.877 acres, close to the 20 acres on Idaho Power's project page, moved from SJA's field into Idaho Power's river parcel. Two cautions. The acreages in the county's description (54.117 and 68.89 acres before the change) don't match the August 2025 GIS roll used below (about 100 and 127 acres). Pull the staff report before stating parcel sizes. And the adjustment shows who holds the land now. It doesn't show what Idaho Power paid or when the deed recorded.

The rest of this section is the August 2025 parcel roll picture, kept for history.

The field Idaho Power circled on its site map is Twin Falls County parcel RP10S21E296020, about 100 acres, property address 5226 E 3610 N. The August 2025 county roll lists the owner as SJA Land Co LLC, with tax bills going to a Dallas, Texas mailing address.

Record	What it shows
Idaho Secretary of State	SJA Land Co., LLC, Idaho LLC no. 0005469900, formed Nov. 7, 2023, active and in good standing. Principal address 468 S. 800 W., Burley. Mailing address P.O. Box in Twin Falls. Registered agent: Sarah J. Aardema of Twin Falls, listed as a noncommercial agent, meaning an individual rather than an agent-for-hire company. The filing does not list members or managers.
Sarah J. Aardema	Named only as SJA's registered agent. Nothing found shows a role beyond that: she does not appear in the IPUC case, the Idaho Power filings, the FERC filing, or news coverage.
Related entity	AMC Rentals, LLC (formed 2008) lists the same Burley principal address and Twin Falls P.O. box. Registered agent: Ashlyn Jane Brown, Dallas.
County parcel roll	SJA Land Co and AMC Rentals share one Dallas mailing address and together hold 10 parcels, about 733 acres, in Twin Falls County. SJA alone holds about 386 acres in six parcels, including the site field and ground along the river west of it.
Neighbor	Brown Milner IV, LLC (registered through CT Corporation, San Francisco office address, formed Aug. 10, 2023) owns about 435 acres just west of the site. No link to SJA or AMC found. Lead only.
IPUC record	Silent. No PUC filing says who owns the 20 acres. The county permit portal now does (Z2026-0001, above).
Idaho Power land	Idaho Power owns the river strip north of the field (RP10S21E296010, 127 acres), the substation parcel, and the hydro plant parcels.
Public land	Federal parcels lie about half a mile west (39 acres) and east of the dam (203 acres). None under the site.

Next step: a recorder search for the deed or other instrument behind the 19.877 acres, and the Z2026-0001 staff report and written decision. LLC members are not listed in Idaho filings for this entity type.

Timeline

Date	Event	Source
1905	Milner Dam completed; primary Carey Act diversion for the Twin Falls and North Side canals	Twin Falls Canal Co. history
1988 to 1992	Dam rebuilt after a quake-risk finding. Idaho Power lends the money and builds Milner hydro 1.5 miles downstream; online 1992 (FERC P-2899)	Canal Co. history; FERC

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Date	Event	Source
1992 to 2022	Milner hydro runs without an NPDES discharge permit. Idaho Power self-discloses in December 2021; consent judgment filed Apr. 13, 2022 (CV42-22-1195), one $72,800 civil penalty for 15 dams, Milner IPDES application due Nov. 7, 2023	Consent judgment
2013	Order 32745: Idaho Power must follow Oregon's competitive bidding rules	IPUC
2021	IRP sets a 2023 capacity deficit date; Staff says the company "belatedly recognized" the deficit	Staff Comments p. 13
2022 to 2025	Back-to-back requests for resources online 2023 through 2028	Ellsworth Direct, via Staff
Mar. 8, 2024	Twin Falls County Ordinance 282: conditional use permit and hearing for every wind and solar project	County code
Aug. 16, 2024	RFP issued; the 2029-and-beyond group draws 83 proposals, 117 bids, nearly 20 GW	IPUC record (rev 4)
Aug. 23, 2024	Deadline for Idaho Power's own benchmark bids, including the Milner 60 MW battery; third-party bids due Sept. 16	Staff Comments p. 8, citing Hackett
Sept. 2024	Idaho Power buys the last remaining firm capacity on Northwest Pipeline	Richins Direct pp. 12 to 13
Nov. 2024	Micron fab special contract signed while the system is short	Staff p. 16
Nov. 2024 to Apr. 16, 2025	Five county work sessions on the energy ordinance and battery storage; no battery rule adopted	County minutes
Feb. 2025	County pays Idaho Power interest about $12,000 below its bill after assessment litigation	County minutes
Spring 2025	Peregrine turbine down payment, before Oregon acknowledges the shortlist (Staff gives April and June; Idaho Power's reply says June)	Staff; Reply
June 25 to Aug. 6, 2025	Idaho Power bids into Williams' Rockies Columbia Connector open season (non-binding, size redacted)	Richins Direct p. 15
July 4, 2025	Federal tax law change; bid team says it can't confirm the 30% credit for the Milner battery	Hackett Direct
July 22 to Aug. 30, 2025	Idaho Power files the final shortlist with Oregon July 22; Oregon acknowledges it (vote Aug. 19, Order 25-327 issued Aug. 30)	Staff Comments p. 8; Oregon PUC
Aug. 4 and 12, 2025	Peregrine neighborhood meetings in Elmore County	Elmore County records
Aug. 26, 2025	County REDs agenda lists an Idaho Power letter of support for SWIP-N	County agenda
Oct. 2025	Evaluation team asks shortlisted bidders for updates; the Milner battery returns as a 222 MW gas plant and is renamed South Hills	Hackett Direct pp. 25 to 27
Oct. 2025	PUC holds a public hearing in Twin Falls on SWIP-North	IPUC
Nov. 2025	Wärtsilä tells Idaho Power engine lead times have hit 30 months	IPUC record (rev 4)

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Date	Event	Source
Nov. 25, 2025	Feasibility study for interconnection request #797, 19.26 MW at Milner 138 kV	Idaho Power GI report
Dec. 2025	Date Idaho Power wants South Hills AFUDC to start	Waites Direct; Staff
Jan. 2, 2026	Order 36898 takes effect: Idaho RFP rules with a waiver process; Order 32745 rescinded	IPUC
Jan. 2, 2026	Idaho Power applies for lot line adjustment Z2026-0001 at the site	County permit portal
Jan. 8, 2026	Extra Peregrine neighbor meeting after Elmore County finds Idaho Power didn't use the county's neighbor list	Elmore County records
Feb. 11, 2026	Nathan Murray of Idaho Power meets the Twin Falls County commissioners "to discuss Battery Storage Facilities"	County agenda and minutes
Mar. 10, 2026	Application filed, IPC-E-26-04, with no waiver request; Modified Procedure requested. Bennett Mountain order (36958) finds a 2028 deficit	IPUC
Mar. 11, 2026	South Hills enters the interconnection queue as #798 at Milner 138 kV	Queue
Mar. 23, 2026	Agenda lists a commissioners' meeting with Michael Kukuk of Williams; minutes silent	County agenda
Mar. 23, 2026	System impact studies for #797 (Milner, 2029) and #796 (Mayfield, 2031); report cover reads "Idaho Power Company - Origination"	Idaho Power GI reports
Mar. 24, 2026	Commissioner Hawkins attends an Idaho Power Energy Academy meeting	County minutes
Apr. 2, 2026	Elmore County P&Z public hearing on Peregrine's conditional use permit	Elmore County
Apr. 6, 2026	Notice of Application, Order 36994; IIPA and Micron intervene. The notice gives South Hills no location	IPUC
Apr. 9, 2026	Idaho Power files its "time-limited opportunity" report with the Oregon PUC (UM 2434). P&Z agenda lists "A LOT LINE ADJUSTMENT (Z2026-0001) Idaho Power" with no location	Oregon PUC; county agenda
Apr. 10, 2026	HB 911 signed; ratepayer protections for large-load contracts signed on or after July 1, 2026	Idaho Code 61-335
Apr. 2026	Idaho Power signs fuel-related agreements adding about $1.6 billion in obligations, May 2030 to May 2045	Q2 10-Q, Note 8
Apr. 20 and 27, 2026	Commissioners meet Murray (Idaho Power) and Kukuk (Williams) for "program updates"	County minutes
May 1, 2026	NW Energy Coalition and Renewable Northwest intervene	Order 37026
May 11, 2026	Intermountain Gas announces a 100,000 Dth/d precedent agreement on the Rockies Columbia Connector project	Intermountain release (via Gap Review)
May 15, 2026	Elmore County board approves two Peregrine variances (stack height, noise)	Elmore County minutes
May 18, 2026	Z2026-0001 final: 19.877 acres move from SJA Land Co to Idaho Power	County permit portal

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Date	Event	Source
May 22, 2026	Rocky Mountain Power gets an RFP waiver under Order 36898 (Order 37049)	IPUC
May 27, 2026	Notice of Modified Procedure, Order 37048; comments due July 31, reply Aug. 14	IPUC
June 1, 2026	County adopts its 2026 All Hazard Mitigation Plan; no mention of the plant or Silver Spur	County minutes; plan
June 2026	South Hills engine deposit paid. A separate $218 million equipment and services commitment is signed, through the first half of 2029, project not named	Reply; Q2 10-Q (via Gap Audit)
June 11, 2026	P&Z recommends approval of Agricultural Zone permitted-use amendments (Z2026-0070)	P&Z agenda
June 17 and 26, 2026	KMVT and KIVI stories; Hackett and Prescott interviewed	KMVT; KIVI
June 23 and 24, 2026	P&Z work session with Twin Falls Canal Co.; next day Idaho Power emails its FERC boundary draft to agencies, the canal company and tribes	County notice; FERC application
July 2026	Wild Idaho Rising Tide asks the PUC for public hearings. No ruling found	Docket
July 21 to Aug. 4, 2026	Public comments posted in 11 batches	Docket
July 31, 2026	Staff, IIPA and NWEC/Renewable Northwest comments. Staff counts 152 comments, all opposed	Docket
Aug. 14, 2026	Idaho Power reply; reports 186 comments as of Aug. 4	Reply
Aug. 26, 2026	Ordinance 294 re-adopts the Agricultural Zone permitted-use list, including "Public utility buildings and facilities"	County minutes
Sept. 1 and 24, 2026	Williams opens Silver Spur pre-filing; FERC approves it	FERC PF26-15
Sept. 8, 2026	P-2899-157 boundary amendment filed at FERC. Same day, county extends White Buffalo's tax exemption to 2029, citing Idaho Power construction restrictions	FERC; county minutes
Oct. 2, 2026	Northwest files draft Resource Report 1 at FERC. PUC case page last updated	FERC; IPUC
Oct. 6, 2026	Commission deliberates privately on IPC-E-26-04	PUC minutes
Oct. 8, 2026	NGI reports Idaho Power signed for 175,000 Dth/d on Silver Spur	NGI
Oct. 14, 2026	Commissioner Reinke attends an Idaho Power tour	County minutes
Oct. 20, 2026	Idaho Power posts a project timeline graphic listing "public meetings and community outreach." No meeting found	Idaho Power page
Oct. 29, 2026	Q3 earnings call: equipment agreements signed for all three plants; South Hills EPC under negotiation; Peregrine EPC signed; the 2031 and 2032 plants aren't in the capital forecast	Benzinga transcript; MarketBeat
Nov. 2, 2026	FERC staff comments on Silver Spur draft resource reports	FERC PF26-15

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Date	Event	Source
Nov. 5, 2026	Material Modification Assessment for #798 (222 MW, "engine halls") finds the change not material	Idaho Power GI report
Nov. 13 and 18, 2026	Silver Spur scoping notice issued and published (91 FR 74153)	FERC; Federal Register
Nov. 17, 2026	Jeff A. Pierson public comment posted in IPC-E-26-04	Docket
Nov. 18, 2026	Gateway West E-8 Final Order 37231: confidential soft cost cap, cost tagging, quarterly load forecasts	Order 37231
Nov. 19, 2026	Idaho Power's South Hills page found at a new address; the old one returns a 404 error. The page says the company "is in the process of obtaining an air quality permit"	Idaho Power
Pending	South Hills final order; DEQ air permit; FERC boundary order; county building permit (planned December 2026)	

How the project changed with no hearing and no notice

Every step below was legal under the rules the company and the Commission used. Put together, the plant grew from a 60 MW battery to a 222 MW gas plant without a single public hearing, a single mailed notice to neighbors, or a single public notice that tied the gas plant to the name Milner.

1. The bid that passed review was a battery.

Idaho Power's internal bid team entered the "Milner 60 MW BESS" benchmark bid by the Aug. 23, 2024 deadline. The independent evaluator, London Economics International, scored it. Oregon regulators acknowledged the final shortlist at a public meeting Aug. 19, 2025. Everything that got outside review described a battery.

2. The swap happened inside the company.

In October 2025 Idaho Power's evaluation team asked shortlisted bidders for "updated pricing or general project updates." Its own internal bid team answered with a 222 MW gas plant. No new solicitation went out, no other bidder was invited to offer gas, and no record shows the independent evaluator re-scoring the new project. Staff's comment: the company "effectively bypassed the entire RFP selection process."

3. The name changed.

The project was renamed South Hills so staff would not confuse it with Milner hydro (Hackett testimony, p. 27). Every public notice that followed used the new name. Both PUC news releases call it the South Hills plant in Twin Falls County. The Notice of Application (Order 36994) and the Modified Procedure order (37048) give South Hills no location at all, though both say where Peregrine goes. None of them mentions Milner, the dam, Murtaugh, or that the project began as a battery. A resident searching the PUC site for "Milner" would find nothing in the notices.

4. Oregon got a report after the fact.

Oregon's rules allow an exception for a "time-limited opportunity to acquire a resource of unique value." The rule requires a report, not approval. Idaho Power filed it April 9, 2026, a month after asking Idaho for the CPCN.

5. Idaho's new rules were skipped.

Order 36898 took effect Jan. 2, 2026, more than two months before the CPCN filing. It requires either a pre-approved RFP or a formal waiver application that explains "why the normal RFP process

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should not apply." Idaho Power filed neither. Staff says the company did not seek a waiver for Peregrine either.

6. Money moved before approval.
Idaho Power reserved Wärtsilä engine slots in late 2025, paid the South Hills engine deposit in June 2026, and wants construction interest (AFUDC) counted from December 2025. Peregrine's turbine deposit went out in spring 2025 (Staff gives both April and June; Idaho Power's reply says June), before Oregon acknowledged the shortlist. By the time the public could comment, the equipment was already bought. Staff reviewed the down payment invoice and "does not dispute the Company's procurement activities or the timing of those activities." Its fight is over when construction interest starts.

7. The PUC chose paper over a hearing.
Idaho Power asked for Modified Procedure in its application. The Commission granted it May 27, 2026 (Order 37048), with a comment deadline of July 31. Under Rules 201-204 a hearing happens only if someone asks for one in a written comment and explains why comments alone are not enough. Wild Idaho Rising Tide asked. No ruling on that request appears in the docket. For comparison, the PUC held a public hearing in Twin Falls for SWIP-North in October 2025.

8. The county step needs no hearing.
Idaho Power says power generation is a permitted use at the site, so it plans only a building permit with Twin Falls County. A permitted use goes through staff, with no Planning and Zoning hearing and no mailed notice to neighbors. Twin Falls County's energy chapter (Title 8, Chapter 21) addresses wind and solar, not gas plants.

9. The air permit has not surfaced.
Idaho Power has hired air permitting consultants and says DEQ will issue a Permit to Construct. No draft permit or comment period has been posted. That may be the only remaining point where the public gets a formal say on emissions.

In their own words

> *"In other words, by substituting a completely different project long after the selection process was complete, the Company effectively bypassed the entire RFP selection process."*
> IPUC Staff comments, July 31, 2026, p. 8
>
> *"Staff believes that if the practice of wholesale project substitution at any point in the RFP process is accepted, all future RFP selection processes would become meaningless."*
> IPUC Staff comments, July 31, 2026, p. 8
>
> *"But Staff contends that the Company willingly embraced a timeline that had zero margin for error."*
> IPUC Staff comments, July 31, 2026, p. 16
>
> *"To prevent confusion internally about whether the Milner hydroelectric facility or the Milner gas resource was being referenced, the project was renamed South Hills."*
> Eric Hackett, Idaho Power, direct testimony, p. 27
>
> *"South Hills and Peregrine represent a time-limited opportunity to acquire resources of unique value to customers."*
> Idaho Power report to the Oregon PUC, April 9, 2026
>
> *"Staff's criticism of Idaho Power's efforts monitoring timelines for material procurement in a very restrictive environment, amidst several dynamic and evolving factors, are unreasonable and unsupported by the facts."*
> Idaho Power reply comments, Aug. 14, 2026

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"Gas is a dispatchable resource, meaning it's there when we need it."
Eric Hackett, Idaho Power, to KMVT, June 17, 2026

"To serve the customers within our service territory within the Magic Valley."
Brandon Prescott, Idaho Power, to KIVI, June 26, 2026

"Idaho Power is asking this Commission to rely upon the future existence of an interstate pipeline."
NW Energy Coalition and Renewable Northwest comments, July 31, 2026

"Persons who would like a hearing must specifically request a hearing in their written comments and explain why written comments alone are insufficient."
IPUC Order 37048, May 27, 2026

"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."
Wild Idaho Rising Tide public comment, July 2026

"Please put the onus on Big Tech to build their own expensive energy facilities."
Sierra Club form comment, filed by commenters in Kimberly, Twin Falls, and Bliss among others

"Wind and solar have an important role in Idaho's energy mix, but they are intermittent resources that cannot produce electricity on demand."
Boise resident supporting both plants, PUC public comment, July 30, 2026

"Public utility buildings and facilities."
Twin Falls County Ordinance 294, Sec. 8-6B-2, item 6, Aug. 26, 2026

"A conditional use permit is required prior to commencing any construction"
Twin Falls County Ordinance 282, Sec. 8-21-3(B), for any wind or solar project

"Idaho Power will also coordinate with Twin Falls County on required building permits, as power generation is a permitted use at the proposed site."
Idaho Power South Hills project page

"The Company does not dispute that large loads are contributing to the capacity needs."
Idaho Power reply comments, Aug. 14, 2026, p. 13

"We've executed equipment supply agreements for all three projects."
IDACORP CEO, Q3 earnings call, Oct. 29, 2026 (third-party transcript)

"I think it was right around a percent of that growth is residential."
Idaho Power executive, Q3 earnings call, Oct. 29, 2026 (third-party transcript)

"We're strong advocates of Idaho's Growth Pays for Growth regulatory approach."
IDACORP CEO, Q3 earnings call, Oct. 29, 2026 (third-party transcript)

"has been chasing the capacity deficit continuously since 2021"
IPUC Staff comments, July 31, 2026

"Commissioners meeting with Nathan Murray, Idaho Power, to discuss Battery Storage Facilities."
Twin Falls County commission agenda, Feb. 11, 2026

"the Natural Gas Act conveys the right of eminent domain to the company."
FERC Silver Spur scoping notice, Nov. 13, 2026

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Issues

1. How South Hills was picked

This is the strongest story in the file, and it comes from the PUC's own Staff. Idaho Power's internal bid team entered a 60 MW battery at Milner. After the bid deadline passed, after the independent evaluator scored and ranked bids, and after Oregon regulators approved the shortlist, the team answered a request for "updated pricing" by replacing the battery with a 222 MW gas plant. Staff calls that "wholesale project substitution" and says that if it is accepted, "all future RFP selection processes would become meaningless." Idaho Power calls it a project update driven by lost tax credits and the 2025 IRP's call for dispatchable power. Hackett says the company checked every project left on the 2029 final shortlist for a dispatchable option and found permitting, interconnection or equipment problems with each, leaving South Hills as the only one that could make June 1, 2029 (Hackett Direct p. 27). Staff grants there were "extenuating circumstances" and still recommends approval. Its objection is to calling the swap "a mere bid change."

The company also filed a notice in Oregon (docket UM 2434) claiming the exception for a "time-limited opportunity to acquire a resource of unique value." Worth pulling.

2. Peregrine skipped the RFP entirely

Staff says Idaho Power "awarded itself the self-build Peregrine project outside of any RFP process, in direct contravention of the Commission's orders" and never asked for a waiver. Staff also says a combined-cycle plant would have been cheaper over time and the company passed on it to make summer 2030. Less local, but it rides in the same order as South Hills.

3. Who is the power for

Staff ties the 2027 to 2030 deficits mainly to large industrial load. Its numbers: the large-customer class grows from 258 to 875 average megawatts between 2026 and 2030, which is 88% of all system growth. The Micron fab alone ramps to 495 MW of minimum billing demand by June 1, 2030, about 445 aMW by Staff's math. Staff asked Idaho Power to run a reliability study without the Micron load. The company declined.

Idaho Power's Aug. 14 reply concedes part of this: "The Company does not dispute that large loads are contributing to the capacity needs." It denies that signing them made the crunch worse. The Irrigation Pumpers report the company told them it "does not evaluate system capacity position without AFL," its label for the large-customer class, so no study splits the need by who causes it.

There is one Magic Valley large load on file. In IPC-E-26-19 Idaho Power asks approval of a special contract for Chobani, whose expansion pushes it past the 20 MW limit for Schedule 19. Chobani asked for 25 MW of contract demand, with room to move between 20 and 40 MW a month (Order 37101, July 21, 2026). The notice doesn't name the site, and Chobani's Idaho plant is in Twin Falls. Even at 40 MW, that is a small fraction of the 222 MW plant and a sliver of Micron's roughly 445 aMW.

Idaho Power's public pitch in the Magic Valley is local growth. Prescott told KIVI the plant is "to serve the customers within our service territory within the Magic Valley." Hackett told KMVT it is "a benefit to the residents of Idaho and to Twin Falls." Staff wants every South Hills cost tagged so it can be assigned to new large loads in the cost-of-service case, IPC-E-26-07 (technical hearing Jan. 19 to 21, 2027).

Investors got a sharper picture than Magic Valley viewers. On the Oct. 29 earnings call Idaho Power said its preliminary 2027 IRP shows load growing 8.9 percent a year for five years, with Micron's two fabs, the Meta data center south of Boise and "another data center that's been unnamed" in the forecast, and about 4,000 MW of large loads in the pipeline. An executive put residential at "right around a percent" of that growth. A second Magic Valley load turned up in county records: White

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Buffalo, a Hansen-area project whose tax exemption the county pushed to 2029 because Idaho Power construction limits delay its operation to October 2028.

4. Cost and who carries the risk

- Cost estimates are redacted. Staff saw them and wants a hard cap at the July 16, 2026 estimate.
- Staff wants construction interest (AFUDC) to start only when a CPCN is issued. Idaho Power wants it back to December 2025 for South Hills.
- Staff wants the company to stop signing new large-load customers until it has a plan to close its deficits, or make those customers interruptible or pay full cost.
- Idaho Power's reply calls Staff's criticism "unreasonable and unsupported by the facts" and asks the Commission to reject the cap.
- Rates are not set in this case. Idaho Power will ask for recovery later.
- The same day this briefing was finished, the Commission granted the Gateway West E-8 certificates (Order 37231, Nov. 18, 2026) with a confidential soft cost cap, separate cost tagging and quarterly load-growth forecasts. Expect Staff's South Hills conditions to be weighed against that order.
- The South Hills EPC contract was still under negotiation Oct. 29. Peregrine's is signed.

5. Gas supply

Richins testimony says Northwest Pipeline is the only gas transport into Idaho and that Idaho Power bought the last firm capacity in September 2024. That capacity will not cover both plants "at certain times of the year." The company bid into Williams' Rockies Columbia Connector open season (June 25 to Aug. 6, 2025). NGI reports Idaho Power signed precedent agreements for 175,000 Dth/d on Silver Spur, which Williams calls the first phase of the Connector concept. See the gas supply section. Silver Spur is an 88-mile, 24-inch line from the Ruby Pipeline in Nevada into Twin Falls County, with new compression at Jackpot and work at the existing Buhl and Mountain Home stations. FERC lists about 275,000 dekatherms a day of new capacity. Pre-filing approved Sept. 24, 2026; company target around 2030.

IDACORP's second-quarter 10-Q (filed July 30, 2026) says Idaho Power signed "fuel-related agreements in April 2026, increasing its contractual purchase obligations by approximately $1.6 billion," and that the obligation "commences in May 2030 and expires in May 2045." The 10-Q doesn't name the counterparty or say whether it's gas supply, pipeline capacity or both. The start date lines up with a pipeline expansion due around 2030. That is a lead to run down, not a finding. South Hills is due in 2029. NWEC calls this reliance on "the future existence of an interstate pipeline."

6. No public hearing, at any level

The PUC is handling the case by written comment only. Compare SWIP-North, where the PUC held a public hearing in Twin Falls in October 2025. At the county level Idaho Power says the use is already permitted, so its December filing is a building permit. KIVI reported the plant would go to Twin Falls County Planning and Zoning after the PUC; Idaho Power's own page says only building permits. That conflict is worth a call to Twin Falls County Planning and Zoning (208-734-9490). Twin Falls County's energy code (Ordinance 282, Title 8 Chapter 21) covers wind and solar. It does not appear to reach gas generation. The county records section below explains why no hearing is scheduled: Ordinance 294 keeps "Public utility buildings and facilities" on the Agricultural Zone's permitted list.

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7. Neighbors and site impacts

Air permit, noise limits, gas lateral route, stack height in feet, and traffic during construction are all open. Idaho Power's promised October outreach meetings did not show up in any search. No local official, canal company, or neighbor is quoted in any story found.

Two gas plants, two counties

Idaho Power asked the PUC for both plants in one application. At the county level they went down different roads.

	Peregrine (Elmore County)	Milner / "South Hills" (Twin Falls County)
Size and type	430 MW, advanced simple-cycle turbines (Q3 call)	222 MW, 12 reciprocating gas engines
Zoning	Heavy Industrial (M-2) with Wildland Urban Interface overlay	Not confirmed. Idaho Power says "power generation is a permitted use at the proposed site."
County permit	Conditional Use Permit with master site plan required (Elmore Zoning Table 7-2-26(B))	Building permit only, per Idaho Power. Planned December 2026.
Neighbor meetings	Aug. 4 and 12, 2025; an extra meeting Jan. 8, 2026 after the county found Idaho Power hadn't used the county's neighbor list	Idaho Power's page listed "public meetings and community outreach" for October 2026. No record found that any were held.
Public hearings	P&Z workshop Jan. 22, 2026; P&Z public hearing Apr. 2, 2026; findings Apr. 30; county board hearings on two variances May 15, 2026 (both approved)	None found in 1,207 county PDFs, Jan. 2025 to Nov. 18, 2026
Stacks	About 160 feet, with a height variance (zone max 80 feet)	Idaho Power: "comparable in height with existing transmission line towers." No number on file.
Noise	Variance up to 75 dBA at 750 feet; county code limit is 58 dBA	Idaho Power: "noise-reduction measures to keep sound levels reasonable." No number on file.
Idaho Power's own words	The county permit is "a chance for the public to weigh in on the proposal and for the county to decide if the use is appropriate."	"Idaho Power will also coordinate with Twin Falls County on required building permits, as power generation is a permitted use at the proposed site."

One lead to run down. The May 15 Elmore County minutes say Idaho Power presented "its appeal" on the variances. That may mean Planning and Zoning denied or narrowed them and the county board reversed. The April 2 P&Z minutes aren't posted. Request them.

Twin Falls County records

From a search of 1,207 Twin Falls County PDFs posted Jan. 1, 2025 through Nov. 18, 2026, and the county's permit portal. The records cited are saved in the Twin Falls County Records folder with the full search memo and scan index.

What the county records show

No posted Twin Falls County record shows a hearing, agenda item, permit, vote or written decision on the plant, under either name.

What the records do show:

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- Idaho Power's South Hills contact briefed the county commissioners twice in 2026. The first briefing came 27 days before Idaho Power filed for the plant, and its listed topic was battery storage.
- Williams' pipeline representative briefed the commissioners in April 2026, four months before Silver Spur went to FERC.
- In August 2026 the commissioners re-adopted the Agricultural Zone's list of uses allowed without a hearing. "Public utility buildings and facilities" stayed on it. If the site is zoned Agricultural, that one line is probably the reason Idaho Power can say it needs only a building permit.
- The county requires a conditional use permit and a hearing for any wind or solar project, large or small. Its code says nothing about gas plants.

Findings, explained

A. Two Idaho Power briefings and one from Williams

What the record says.

- Feb. 11, 2026, 1:30 p.m.: "Commissioners meeting with Nathan Murray, Idaho Power, to discuss Battery Storage Facilities." The weekly minutes repeat the line and add nothing.
- Apr. 20, 2026, 1:30 p.m.: "Commissioners met with Nathan Murray for an Idaho Power program update."
- Mar. 23, 2026: the agenda lists "Commissioners to meet with Michael Kukuk from Williams Pipeline" at 2:00 p.m. That day's minutes don't mention it.
- Apr. 27, 2026, 3:00 p.m.: "Commissioners met with Michael Kukuk, Williams Pipeline, for a program update."

What it means. Murray is the contact Idaho Power lists on its South Hills project page. The February meeting fell four weeks before the March 10 PUC filing. Its listed topic was battery storage, though Idaho Power's own Milner bid had already been swapped from a battery to a gas plant the previous October. The April meeting came six weeks after the filing and two weeks after the PUC's notice of application. So the county's elected board had two chances to hear about the plant from Idaho Power before local TV covered it in June (KMVT June 17, KIVI June 26). The minutes can't tell us whether the gas plant came up. They record a topic line and nothing else.

The Williams meeting matters because Silver Spur would run through Twin Falls County, which has road, crossing and emergency planning interests in it. Williams filed its FERC pre-filing request Sept. 1.

B. Ordinance 294 and "public utility buildings and facilities"

What the record says. P&Z heard text amendments to the Agricultural Zone's permitted uses on June 11, 2026 (Z2026-0070) and recommended approval. On Aug. 26, 2026 the commissioners adopted Ordinance 294, repealing and replacing Section 8-6B-2, Principal Permitted Uses. The new list:

- Agricultural buildings
- Farm labor dwelling units
- Livestock confinement operations
- One single-family dwelling per 40 acres
- Private stables
- **Public utility buildings and facilities**
- Roadside farm stands
- Natural fermentation of grapes grown on site

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- Full agricultural use under Idaho Code 67-6529

Testimony came from farmers who wanted to store their own harvest. The minutes record no mention of power plants, gas or Idaho Power. The plant had been on KMVT and KIVI two months earlier.

What it means. A permitted use needs no hearing, no published notice and no mailed notice to neighbors. Idaho Power has said power generation is a permitted use at the site. If the field is Agricultural, item 6 is the likely basis.

The county code doesn't define "public utility buildings and facilities." It defines a "utility" as "any public or private corporation or company which supplies the public or a group of individuals" with telephone, gas, electricity, water or sewage disposal. Idaho Power fits that. Whether a 222 MW plant with twelve engines is a utility "building or facility" in the same sense as a substation, a pump house or a phone exchange is a judgment call. The record doesn't show who made that call or when.

The county's public GIS has no county zoning layer, so the site's zone is still unconfirmed.

C. The wind and solar comparison

Ordinance 282 (March 8, 2024) created Title 8, Chapter 21 for wind and solar. It says "A conditional use permit is required prior to commencing any construction" for "any small or large scale energy project," and puts large-scale wind and solar in front of the P&Z Commission. Battery storage isn't regulated as its own use. Gas and other thermal generation aren't addressed at all. Section 8-21-4 mentions natural gas pipelines only to note limits on local rules that would block utility service or dictate energy sources.

So under the county's code a 5-acre solar array needs a conditional use permit and a hearing. A 222 MW gas plant can go through on a building permit, if the county treats it as a public utility facility.

D. The battery storage ordinance that didn't finish

Commissioners held a work session on the energy ordinance in November 2024, then at least four more on "Battery Energy Storage System" (Feb. 6, Feb. 18, Mar. 20 and Apr. 16, 2025). I found no hearing or adoption of a battery amendment in any posted record through Nov. 18, 2026. Idaho Power's Milner bid during those months was a 60 MW battery. Nothing in the record ties the two together.

E. Idaho Power lot line adjustment, Z2026-0001

The April 9, 2026 P&Z agenda listed "A LOT LINE ADJUSTMENT (Z2026-0001) Idaho Power" as a business item with no location. The county's permit portal fills the gap. The adjustment is at 5226 E 3610 N, the plant site. It moved 19.877 acres from SJA Land Co's field (RP10S21E296020) into Idaho Power's river parcel (RP10S21E296010). Idaho Power applied Jan. 2, 2026, ten weeks before its PUC filing. The county finalized it May 18, 2026. The listed contact is Leon Letson for Idaho Power. The approval letter, minutes, written decision and staff report are attached on the portal and still need to be pulled. Anyone reading the April agenda had no way to know this item was the gas plant site.

Other permits found in the same portal: a floodplain permit for Idaho Power at the far west end of the county (Z2026-0011, not tied to the plant); a June 2026 building permit for a Northwest Pipeline recompression skid at the existing Buhl compressor station on BLM land (B2026-0279, $360,000, not tied to Silver Spur in the permit); and a pending lot line adjustment adding 1.46 acres to a Northwest Pipeline parcel near Buhl (Z2026-0016, purpose not stated). Older permits from 1990 and 1996 list Idaho Power at the Milner hydro area.

F. Who must sign off on the building permit

The county's commercial building permit application requires sign-off from:

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- South Central District Health (septic)
- The highway district for an approach permit. Murtaugh Highway District is on the list.
- The canal company or water district. The list includes the Milner Irrigation District, 5294 East 3610 North, on the same road as the site, and the Twin Falls Canal Company.

Each is a public body with its own board. Their agendas are the next place the plant could surface before construction.

G. A Hansen project waiting on Idaho Power

On Sept. 8, 2026, the commissioners pushed the start of White Buffalo's property tax exemption (Idaho Code 63-602NN) to Jan. 1, 2029. Its consultant, Stace Campbell of CTS, "reviewed the construction restrictions with Idaho Power and Water Resources which will delay being able to operate before October 2028." The minutes don't say what White Buffalo makes or how much power it needs. It's a second Magic Valley load on file, after Chobani, and its timing lines up with the plant's June 2029 date. Nothing in the record ties it to the plant.

H. The county's hazard plan

The commissioners adopted the 2026 All Hazard Mitigation Plan on June 1, 2026. Two Williams Pipeline employees were on the planning team. The plan doesn't mention the planned gas plant or the Silver Spur expansion.

I. A canal company work session

On June 23, 2026, P&Z held a work session listed only as "Discussion with Jay Barlogi, Twin Falls Canal Company." No topic, no public comment. Idaho Power emailed its FERC boundary draft to the canal company the next day. The canal company works with P&Z on many things, and nothing ties the two events together. It goes on the records list for that reason.

J. Other Idaho Power business before the board

- Feb. 2025: the board approved an interest payment to Idaho Power about $12,000 below what Idaho Power billed, after Idaho Power's assessment litigation with the state. Then-Commissioner Hall said he was "very disappointed that Idaho Power is collecting interest over 3 years while they were litigating with the state over the assessment."
- Aug. 26, 2025: the county's REDs meeting agenda listed "Idaho Power Leter [sic] of Support for SWIP-N Project."
- Mar. 24, 2026: Commissioner Hawkins attended an Idaho Power Energy Academy meeting.
- Oct. 14, 2026: Commissioner Reinke attended "an Idaho Power tour." The location isn't recorded.

K. The name

The South Hills are the mountains south of Twin Falls, Kimberly and Hansen, the Cassia Division of the Sawtooth National Forest. The Forest Service calls them a 40-minute drive south of Twin Falls. The plant sits on the Snake River at Milner Dam. Idaho Power's testimony says it renamed the "Milner gas resource" to avoid internal confusion with Milner hydro (Hackett Direct p. 27). It hasn't said why it picked "South Hills." The county records never use either name for the plant.

Repercussions

For neighbors. If the county treats the plant as a permitted use, nobody near Milner Road gets a mailed notice, a posted sign or a hearing at the county level. The PUC case ran on paper. FERC hasn't noticed the boundary change. DEQ's air permit is the only formal comment window left, and it covers emissions only. Neighbors who want a say on noise, traffic, lighting, setbacks or stack height have no scheduled forum anywhere.

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For the county. Once a 222 MW gas plant counts as a public utility facility, the same reading covers the next one, and the one after that. Any utility-owned plant that Chapter 21 doesn't cover, gas or otherwise, of any size, could locate in the Agricultural Zone by right. A private developer couldn't claim the same shortcut. A farmer putting up a few acres of solar panels needs one now. Battery storage, which the commissioners spent five work sessions on in 2024 and 2025, is still unregulated as its own use.

For the record. County decisions that are never written down are hard to appeal and easy to repeat. A determination made over a counter, with no written decision, leaves nothing for a neighbor to challenge and nothing for the next commission to follow.

For the PUC and FERC cases. None of this changes the PUC case directly. It does show that every review the plant gets is happening somewhere other than Twin Falls County. The state looks at need and cost. FERC looks at a tenth of an acre. DEQ looks at air. No body is looking at the plant as a neighbor.

For taxpayers. White Buffalo's exemption follows the usual 63-602NN pattern: the new plant's added value is exempt for up to five years, and the tax shifts to everyone else in the meantime. The Idaho Association of Counties' own training material tracks the "property tax shifted" by these exemptions. Meanwhile the projects being courted are the same ones waiting on Idaho Power capacity.

What to ask the county for

Send records requests to pandz@tfco.org (Planning and Zoning) and commiss@tfco.org (Commissioners), citing Idaho Code 74-102. The full list of nine requests is in the search memo. The four that matter most:

- The zoning of parcel RP10S21E296020, and any written determination that a power plant is a permitted use there, with the date and the staff member who made it.
- The Z2026-0001 lot line adjustment file.
- Any handouts, slides or notes from the Feb. 11 and Apr. 20, 2026 Idaho Power meetings and the Apr. 27, 2026 Williams meeting.
- The P&Z minutes and staff report for Z2026-0070 (June 11, 2026).

And ask the commissioners on the record: when did you first hear about a gas plant at Milner, and from whom?

Air quality: estimated emissions

These are my estimates, not Idaho Power or DEQ figures. No draft air permit for South Hills has been posted, and the company's DEQ application is not public. Idaho Power says it is "in the process of obtaining an air quality permit." The numbers below should be checked against the application once it is obtained.

Estimated annual emissions (short tons per year)

Pollutant	Light use (10% capacity factor)	Moderate use (35%, similar to Danskin)	Full potential (8,760 hours)
Nitrogen oxides (NOx)	14	48	137
Carbon monoxide (CO)	26	90	257
Volatile organic compounds (VOC)	26	90	257
Particulate matter (total)	26	90	257

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Pollutant	Light use (10% capacity factor)	Moderate use (35%, similar to Danskin)	Full potential (8,760 hours)
Sulfur dioxide	0.5	1.6	5
Formaldehyde (hazardous air pollutant)	4	15	42
Carbon dioxide	93,000	327,000	934,000
Methane (upper-bound default factor)	about 1,000	about 3,500	about 10,000
Natural gas burned, average	4.2 million cu ft/day	14.8 million cu ft/day	42 million cu ft/day

At full load the plant would emit roughly 31 pounds of NOx, 59 pounds of CO, and 10 pounds of formaldehyde per hour. Startups are not included and add to these totals. A plant built to cycle on and off daily will run above the steady-state numbers.

How the estimate was built

- Engine model. Idaho Power says South Hills uses the same suppliers as the Bennett Gas Expansion, which uses Wärtsilä reciprocating engines. Twelve engines at 222 MW is about 18.5 MW each, which matches the Wärtsilä 18V50SG (18.8 MW per unit, 46 percent efficiency per Wärtsilä). I assumed that model.
- Fuel use. 46 percent efficiency converts to a heat rate of about 8,218 Btu per kWh on a higher-heating-value basis. At 222 MW that is about 1,824 million Btu of gas per hour at full load.
- Controls. I assumed selective catalytic reduction (SCR) for NOx and an oxidation catalyst for CO, VOC, and formaldehyde. Every comparable recent permit for these engines requires both. If DEQ allows less, emissions go up sharply.
- Emission rates for NOx, CO, VOC, and particulates. Wärtsilä's published controlled figures: NOx 5 ppm (0.064 g/kWh), CO 15 ppm (0.12 g/kWh), VOC 0.12 g/kWh, particulates 0.12 g/kWh.
- Formaldehyde. EPA AP-42 Table 3.2-2 factor for four-stroke lean-burn gas engines, 0.0528 lb per million Btu, reduced 90 percent for the oxidation catalyst (the reduction the San Diego air district applies).
- Sulfur dioxide. AP-42 factor of 0.000588 lb per million Btu for pipeline gas.
- Carbon dioxide. Standard natural gas factor of about 117 lb per million Btu.
- Methane. AP-42's default of 1.25 lb per million Btu for this engine type, which I treat as an upper bound. Methane passes through these engines unburned and catalysts do not remove it. Newer engines are likely lower. This is the least certain line in the table.
- Operating cases. 10 percent is a true peaker. 35 percent matches how hard Idaho Power ran its Danskin gas plant in 2025 (about 926 GWh from 271 MW). Full potential, 8,760 hours at full output, is what regulators use to classify the source before limits are written.
- Cross-check. DEQ took comment April 29 to May 29, 2026 on a draft permit for nine of these engines at Bennett Mountain. That statement of basis would be a better estimate than mine. DEQ's notice page is back up (checked Nov. 18) but posts no permit file, so a records request is still the way to get it. The Phase 2 research packet in this folder reports the issued Bennett permit, P-2025.0035 (June 26, 2026), caps the nine engines combined at 225 tons a year each of NOx and CO and 204 tons of VOC to stay under the PSD line, with 90-foot stacks and no more than 12 starts per engine per day. Not yet checked against the permit. If it holds, those are plant-wide caps. Don't scale them by 12/9 and call the result a South Hills limit.

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Legal triggers these numbers point to

PSD major source line (250 tons per year).
At full potential, CO, VOC, and particulates each come in near 257 tons, just over the 250-ton threshold for Prevention of Significant Deterioration review under the Clean Air Act. PSD means best available control technology, more detailed air modeling, and a heavier public process. The common response is a "synthetic minor" permit: the company accepts enforceable caps on hours or tons that keep it under 250. One EPA permit for these same engines caps the site at 225 tons on a 12-month rolling basis. Watch for that cap in the South Hills draft. If it appears, ask how DEQ will enforce it on a plant whose whole purpose is to run hard during shortages.

Title V operating permit (100 tons per year).
NOx, CO, VOC, and particulates all clear 100 tons at full potential. That makes South Hills a major source requiring a federal operating permit, which Idaho issues as a Tier I permit. Bennett Mountain already holds one. A Tier I permit comes with its own public comment period and EPA review.

Major source of hazardous air pollutants (10 tons of one, 25 tons combined).
Formaldehyde alone is about 15 tons in the moderate case and 42 at full potential. Unless capped below 10 tons, South Hills is a major HAP source. That brings in the federal engine standard for major sources, 40 CFR Part 63 Subpart ZZZZ, with formaldehyde or CO reduction requirements and testing. New spark-ignition engines must also meet 40 CFR Part 60 Subpart JJJJ regardless.

Idaho toxic air pollutant review.
Idaho's air rules require new sources to show that toxic air pollutants, formaldehyde among them, stay below state screening levels or pass modeling. With homes along E 3610 N a few hundred yards away, this is where neighbors have the strongest technical footing.

National ambient air quality standards.
A permit to construct requires showing the plant will not cause or contribute to a violation of the federal standards for NOx (one-hour NO2 especially), particulates, and CO. Short, tall stacks near a river canyon can be hard cases for one-hour NO2 modeling. Ask for the modeling files.

Greenhouse gas reporting.
At any realistic run level, CO2 exceeds 25,000 metric tons a year, which triggers EPA's mandatory greenhouse gas reporting rule (40 CFR Part 98). Those reports become public and would show real fuel use and emissions once the plant runs.

Ammonia handling.
SCR needs ammonia or urea. Ammonia also escapes the stack ("slip"). A permit application for six of these engines in Ohio lists ammonia emissions next to NOx. If South Hills stores aqueous ammonia in quantity, federal chemical accident prevention rules (40 CFR Part 68) and emergency planning reporting may apply. That matters to the Murtaugh fire district and anyone downwind.

Public comment on the air permit.
The DEQ permit is now the only remaining step where the public gets a formal, written say on this plant. DEQ held a 30-day comment period on the Bennett draft and on a Rathdrum gas plant permit revision in 2026. Expect the same, and ask DEQ to hold a hearing in Murtaugh or Twin Falls.

Questions for Idaho Power and DEQ

- What engine model, emission guarantees, and methane slip rate are in the Wärtsilä contract?
- What annual hour or ton limits will Idaho Power accept, and are they set to stay under 250 tons per year?
- How many starts per year are assumed, and what are the startup emissions?
- What are the modeled formaldehyde and one-hour NO2 concentrations at the nearest homes on E 3610 N?

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- Will ammonia be stored on site, in what form and quantity?
- When will DEQ post the draft permit, and will it hold a hearing in the Magic Valley?

Air permit timing

Idaho Power lists site preparation in January 2027 and construction in March 2027. Its South Hills page says DEQ "would review and issue an air quality Permit-to-Construct before the plant begins operating" and that the company "is in the process of obtaining an air quality permit." Its Bennett Mountain page says the same kind of permit "must be approved before construction can move forward." Idaho rules (IDAPA 58.01.01.201) generally require the permit before construction, with listed exceptions. DEQ's public comment listings show no South Hills notice yet. Ask DEQ whether the application is in, whether the source is major or synthetic minor, and what notice is planned. This is a question, not a finding of a violation.

IDACORP's Oct. 29 10-Q notes EPA's May 2026 proposed new source review revision could speed new gas generation if adopted and carried out by DEQ. EPA also proposed changes to minor-source public participation on July 1. Both are proposals.

Gas supply and the Silver Spur pipeline

Briefing rev 4 said nothing in the folder confirmed Idaho Power was a Silver Spur shipper. Two October articles say it is.

- NGI (Oct. 8, 2026): Northwest Pipeline "executed long-term binding precedent agreements" with Idaho Power for 175,000 Dth/d and with Intermountain Gas Company for 100,000 Dth/d. Total project capacity is 275,000 Dth/d. NGI cites Northwest's draft Resource Report 1 and Summary of Alternatives, filed at FERC in PF26-15.
- Oil & Gas Watch (Oct. 8, 2026): "In an Oct. 2 filing with FERC, Williams said two Idaho utilities, Idaho Power Company and Intermountain Gas Company, have purchased all of the capacity on the Silver Spur pipeline." Neither utility has said how it will use the gas.
- Route per NGI: 24-inch, about 87.7 miles, from a new Ruby Pipeline receipt meter in Elko County, Nev., to Northwest's mainline in Twin Falls County. Supply from the Opal hub in Lincoln County, Wyo. Schedule: certificate application May 2027, construction fourth quarter 2028, in service second quarter 2030.

How this fits the PUC record:

- Richins Direct (pp. 12 to 13): Idaho Power bought "the last remaining firm capacity on the Williams Northwest Pipeline in September 2024," and it won't cover both new plants "at certain times of the year."
- IDACORP SEC filings: about $1.6 billion of fuel-related purchase obligations signed in April 2026, running May 2030 to May 2045, counterparty not named. The start date lines up with Silver Spur's in-service window. That is a timing match, not proof they are the same contract.
- Timing gap: South Hills is supposed to run June 1, 2029. Silver Spur is targeted for the second quarter of 2030. Idaho Power hasn't said where the plant's fuel comes from during that first year beyond its existing Northwest capacity.

A caution from Gap Audit Rev03. That audit treated 175,000 Dth/d as the arithmetic remainder after Intermountain's 100,000 and said it didn't prove the remainder belonged to Idaho Power. NGI states the 175,000 figure for Idaho Power directly, so the audit's caution is now answered by a second source. It still rests on trade press. Read the FERC original before publishing it as fact, and don't say how much of the gas is meant for South Hills. No filing says.

Still to get: PF26-15 originals (pre-filing request 20260901-5103, draft RR1 and alternatives 20261002-5084, FERC staff comments 20261102-3002, monthly status 20261102-5234). FERC's

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file server blocks automated downloads from the research workspace. Pull them by hand or through a browser.

Primary support for the shipper figure. A parallel research session (Grok, Nov. 18) reports reading mirror copies of Northwest's pre-filing request and draft Resource Report 1, and says they support the 175,000 Dth/d figure for Idaho Power and 100,000 Dth/d for Intermountain Gas. The same draft report also corroborates Williams' March 2026 outreach to the Twin Falls County commissioners. Confirm against FERC accession 20261002-5084 before publishing, because mirror copies can differ from what's on file.

Intermountain Gas. Intermountain announced on May 11, 2026 a precedent agreement for 100,000 Dth/d on the Rockies Columbia Connector project, and said the Connector would deliver about 275,000 Dth/d through the Silver Spur Expansion.

Other gas items. The interconnection reports and FERC filings show no gas lateral route to the site yet. The existing Northwest line runs south of the field. A new delivery point could go through Northwest's blanket certificate (prior notice at FERC) if it's interstate, or through state rules if it's a local line. No filing for either has been found.

FERC: what it controls here and what's on file

FERC does not approve the South Hills plant. The plant needs a certificate from the Idaho PUC, an air permit from Idaho DEQ and a building permit from Twin Falls County. FERC touches the project in four places.

FERC role	What it means at Milner	Status, Nov. 18, 2026
Hydropower license, Milner Project P-2899	Land inside the hydro project boundary can't be sold, leased or given up without FERC's written permission (license Article 5).	Idaho Power and Milner Dam, Inc. asked on Sept. 8, 2026 to remove 0.1182 acres for the plant's fenced yard. No FERC notice or order found.
Interstate gas pipelines	FERC certificates interstate pipelines and can grant eminent domain with them.	Silver Spur (PF26-15) in pre-filing. Scoping comments due Dec. 14, 2026.
Transmission tariff and generator interconnection	Idaho Power's interconnection queue runs under its FERC-approved transmission tariff. South Hills is queue #798 at Milner 138 kV.	Queue entry March 11, 2026. No FERC agreement filing found yet.
Utility accounting	Idaho Power reports construction spending to FERC each year (Form 1).	2025 Form 1 filed April 2026. South Hills lines not yet checked.

The Milner boundary amendment (P-2899-157)

The filing. On Sept. 8, 2026, Idaho Power Company and Milner Dam, Inc., co-licensees of the Milner Hydroelectric Project since 1989, applied to remove "approximately 0.1182 acres" from the project boundary in the SW1/4 SE1/4 of Section 29, T10S, R21E. The stated reason: "to accommodate construction of a new thermal power plant on lands outside the Project boundary. The property has historically been used for agricultural purposes; however, it will be graveled and incorporated into the fenced area containing the power plant." The companies asked FERC to approve it "expeditiously." Signed by Ryan Adelman, Vice President, Power Supply. FERC sub-docket P-2899-157, accession 20260908-5365, per the eLibrary check recorded in "A Tenth of an Acre at Milner," rev 1.

Size. 0.1182 acres is about 5,150 square feet, roughly 72 feet on a side. It sits at the northeast edge of the pivot field, next to Milner Road.

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What the application tells FERC.

- Idaho Power owns the strip, and it serves no project purpose.
- No historic properties will be affected.
- No water quality certification was sought, and no formal Endangered Species Act consultation.
- The application "does not seek approval for any ground-disturbing activities." The gravel and fence come after the land leaves FERC's hands.
- License Article 414 requires 23.5 acres of riparian wetland habitat. The licensees built 23.8 acres along the south side of the Twin Falls Main Canal and say they will still comply. The application doesn't say whether the 0.1182 acres is part of that habitat. If it is, the cushion drops from 0.3 acres to about 0.18.

Who got the draft. Idaho Power counsel Lisa Lance emailed the draft June 24, 2026, during the PUC comment period, with comments due by Aug. 24. Recipients: two staff at U.S. Fish and Wildlife, Idaho Fish and Game, BLM, EPA, Twin Falls Canal Co., the Shoshone-Bannock Tribes, the Shoshone-Paiute Tribes and the Idaho State Historical Society. Copied: an outside attorney at Parsons Behle and three Idaho Power staff. Fish and Wildlife replied July 20 with no comments. No other reply is in the filing.

What the filing says about that. Section IX names only four agencies (Fish and Wildlife, Fish and Game, BLM, EPA). The canal company, both tribes and the historical society appear only in an email header inside Attachment 3. No record shows neighbors, Twin Falls County or the county's planners were told.

Milner Dam, Inc. Co-applicant and co-licensee, at the Twin Falls address 357 6th Ave. W. A DOE-indexed industry article describes it as wholly owned by the Twin Falls Canal Co. and the North Side Canal Co. (per the explainer; not independently checked). The canal companies' 1988 deal with Idaho Power rebuilt the dam with an Idaho Power loan repaid through hydro royalties (Twin Falls Canal Co. history page).

Notice history. FERC published notices inviting comments and interventions for earlier Milner license amendments in Dec. 2000 and fall 2010 (per the explainer). A Federal Register search on Nov. 18, 2026 found no FERC document mentioning Milner published since Jan. 1, 2025. A FERC eLibrary search of the P-2899 docket for Jan. 1 to Nov. 18, 2026 found the Sept. 8 application as the only entry in sub-docket 157: no notice, no deficiency letter, no comments, no order.

How the public gets in. File a comment any time through FERC eComment, referencing P-2899-157. Sign up for eSubscription on P-2899 to see a notice the day it posts. If FERC issues a notice, it will set a deadline for comments, protests and motions to intervene. Only intervenors can seek rehearing. FERC Office of Public Participation: 202-502-6595, OPP@ferc.gov.

Why it matters. It's the first federal filing that puts the gas plant on the Milner hydro map. It names Milner in its caption while every PUC notice on the plant does not. And it moved forward while public attention sat on the state case.

Other 2026 activity on the Milner license

The P-2899 docket is busy this year, almost all of it dam safety work by Milner Dam, Inc. and Idaho Power. From the eLibrary listings:

- Jan. 28: FERC's Portland office posts its environmental inspection report on the Milner Project (site visit Sept. 2, 2025). This is the report to check for how FERC sees the Article 414 riparian habitat.
- Feb. to Oct.: a sinkhole repair plan, revised several times; service spillway repairs; an emergency spillway deck and concrete repair plan; replacement of a monitoring well (piezometer OW-5), with an extension requested to March 31, 2027.
- July 20: FERC follow-up letter on the June 30, 2026 dam safety inspection.

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- Oct. 6: FERC response on the plan for the 2027 independent Part 12D assessment of the dam.
- Oct. 30: Milner Dam, Inc. reports flow through an embankment drain found Sept. 20, 2026 at North Milner Dam. The report itself is restricted as critical infrastructure information. Only the cover letter is public.

None of these filings mentions the gas plant. They're listed so routine dam safety paperwork on the P-2899 docket isn't mistaken for action on the boundary change.

Silver Spur pipeline (PF26-15)

What it is. Northwest Pipeline, LLC (Williams) plans about 88 miles of new 24-inch pipe from the Ruby Pipeline in Elko County, Nevada into Twin Falls County. About 275,000 dekatherms a day of new firm capacity from Opal, Wyoming supply to Idaho delivery points. Plus:

- a new 4,700 hp Jackpot Compressor Station in Twin Falls County
- a new 15,900 hp compressor unit and restaging at the existing Buhl Compressor Station
- two new turbine compressors (23,600 hp) replacing three engines at the Mountain Home Compressor Station in Elmore County
- a new delivery regulator station at the tie-in to the existing Northwest Pipeline in Twin Falls County
- a receipt meter station at Ruby in Nevada

The route map in the notice ties in near Twin Falls and runs south to Nevada. It does not run to Milner.

Status. Docket opened Sept. 1, 2026. FERC approved pre-filing Sept. 24, 2026. FERC says the project "has not been approved or authorized." Scoping notice issued Nov. 13, 2026, published in the Federal Register Nov. 18, 2026 (doc. 2026-23441). BLM intends to be a cooperating agency. FERC will decide later between an environmental assessment and an EIS. Acreage is "unknown." FERC's project page also lists Power County, Idaho. The scoping notice does not. Ask why.

What's in the docket so far (FERC eLibrary, through Nov. 18, 2026):

- Sept. 1: Northwest's request to start pre-filing. A public version and a privileged version with the affected landowner list.
- Sept. 24: FERC letter approving pre-filing.
- Sept. 28: third-party contractor agreement for the environmental review.
- Oct. 2: draft Resource Report 1 and a draft Summary of Alternatives. Resource Report 1 is where a pipeline normally lays out its purpose, route and any signed shipper agreements.
- Nov. 2: FERC staff comments on the preliminary draft Resource Reports 1 and 10, and Northwest's first monthly status report.
- Nov. 13: the scoping notice.

The filing list is saved in the FERC Silver Spur folder as a spreadsheet with a link to each filing. FERC's file server refused direct downloads, so the reports themselves still need to be pulled by hand.

Dates.

- Tue., Dec. 8, 2026, 5 to 8 p.m. PST: scoping session, Wells Combined School Cafeteria, Wells, Nev.
- Wed., Dec. 9, 2026, 5 to 8 p.m. MST: scoping session, 512 Main Ave. N., Twin Falls. The notice names "Mountain Valley High School." That address is Magic Valley High School. Confirm with FERC before telling people where to go.
- Mon., Dec. 14, 2026, 5 p.m. Eastern: written comments due.

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Comments are taken one on one with a court reporter. Recorded interviews and disruptive video equipment are not allowed in the session room. Intervention opens only after Northwest files a formal application.

Eminent domain. The notice tells landowners that if FERC approves the project, "the Natural Gas Act conveys the right of eminent domain to the company."

Tie to South Hills. Idaho Power testified it bought "the last remaining firm capacity on the Williams Northwest Pipeline in September 2024" and that it won't cover both plants "at certain times of the year" (Richins Direct pp. 12 to 13). It bid into Williams' Rockies Columbia Connector open season, June 25 to Aug. 6, 2025 (Richins Direct p. 15, bid size redacted). NGI reports Idaho Power signed for 175,000 Dth/d on Silver Spur, and a draft resource report read by another session supports it (see the gas supply section). No filing says how much of that gas is for South Hills. Williams' target (about 2030) still trails the plant's June 1, 2029 date. Issue 5 covers a $1.6 billion fuel-related obligation Idaho Power signed in April 2026 that starts May 2030.

Other FERC-related items within about 10 miles

Item	FERC tie	Status
Milner Hydroelectric Project, P-2899	Hydro license (1988), co-licensees Idaho Power and Milner Dam, Inc.	Boundary amendment P-2899-157 pending
Idaho Power queue #798 (South Hills), 222 MW at Milner 138 kV	Idaho Power transmission tariff	Queued March 11, 2026
Idaho Power queue #797, 19.26 MW at Milner 138 kV, Idaho Power origination, technology not stated	Idaho Power transmission tariff	System impact study Mar. 23, 2026. What is it?
Milner Dam Wind Park, Cassia County	Possible qualifying facility filing (Form 556)	Not yet checked
Milner Butte landfill gas, Cassia County	Possible qualifying facility filing (Form 556)	Not yet checked
Gas delivery point or lateral for South Hills	Northwest Pipeline blanket certificate (prior notice) if interstate; state rules if local	No filing found yet
Silver Spur tie-in near Twin Falls, Buhl compressor work	PF26-15	Pre-filing

Federal Register checks, Nov. 18, 2026: zero FERC documents mentioning Milner since Jan. 1, 2025. One FERC document since June 1, 2025 matching Northwest Pipeline and Twin Falls: the Silver Spur scoping notice.

What Idaho Power told investors

IDACORP third-quarter earnings call, Oct. 29, 2026 (transcript saved in Gap Review 2026-11-18).

- CEO Lisa Grow listed "three company-owned natural gas-fueled projects": Bennett Mountain (167 MW, under construction, 2028), South Hills (222 MW, 2029) and Peregrine (430 MW, 2030).
- Peregrine's EPC contract is signed. For South Hills, "we're negotiating a contract."

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- CFO Brian Buckham: "neither of those two plants are in that CapEx forecast," speaking of the 2031 and 2032 plants, not South Hills or Peregrine. Spending above plan would be funded about 50/50 debt and equity. An updated capital forecast comes on the fourth-quarter call.
- Load: the preliminary 2027 IRP shows load growth of 8.9 percent a year over five years, about 19,000 GWh in 2027 rising to about 29,000 GWh by 2032. The forecast includes Micron Fab 1 and Fab 2, the Meta data center south of Boise (operating since September) and "another data center that's been unnamed." On the call, an Idaho Power executive said "right around a percent of that growth is residential."
- The company says its future large-load pipeline is about 4,000 MW, plus about 3,000 MW of newer inquiries.
- 2032 RFP: more than 100 bids. Two company-owned gas plants topped the shortlist, a 430 MW simple-cycle unit for 2031 and a 432 MW combined-cycle plant for 2032 (Earnings Whispers summary). Locations not stated. Idaho Power's Peregrine page says the site has room for a second gas plant.

From Gap Audit Rev03 (not rechecked here): the Q2 2026 Form 10-Q discloses a separate $218 million equipment and technical-services commitment signed in June 2026, running through the first half of 2029. The filing names neither the supplier nor the project. First half 2029 is South Hills' build window. Ask Idaho Power what it covers.

Correction on the capital forecast remark. The Benzinga transcript settles it. The CFO's "neither of those two plants are in that CapEx forecast" followed Idaho Power's description of its 2031 plant (430 MW) and 2032 plant (432 MW). It doesn't refer to South Hills or Peregrine, and it shouldn't be used to say those two are unbudgeted.

Idaho Power's changing story on need

Jeff asked for his earlier article and post on this to be documented here. Two candidates were checked and ruled out ("Who Pays for Growth," May 12, 2026, and "AI, Power Bills, and the Battle for Idaho's Energy Sovereignty," Nov. 19, 2025). Neither compares Idaho Power statements. **Link needed from Jeff.** Until then, this section rests on the filings in this folder.

When	What Idaho Power or the record said	Source
2021 IRP	Staff says the company "belatedly recognized that its system was already in deficit" and set a 2023 capacity deficit date.	Staff Comments, July 31, 2026, p. 13, citing IPC-E-21-43 Staff Comments at 4
2022 to 2025	Idaho Power filed "consecutive requests to acquire resources to be online in 2023, 2024, 2025, 2026, 2027, and 2028."	Ellsworth Direct at 12, quoted by Staff
2023 IRP	Incremental capacity need of 142 MW in 2029 and 369 MW in 2030. The preferred portfolio leaned on solar, wind, batteries, efficiency, peaking hydrogen, demand response and geothermal. SWIP-North was left out of the preferred portfolio.	Idaho Power Reply, Aug. 14, 2026, pp. 3 to 4; Jeff's Substack post on SWIP-N, Nov. 13, 2025, quoting the 2023 IRP
2023 IRP load forecast	The Micron fab load first appears in Idaho Power's forecast.	Idaho Power Reply p. 13
Aug. 2024	The all-source RFP the company calls "rule-compliant" begins. Idaho Power's own bid for Milner is a 60 MW battery.	Reply p. 16; Hackett Direct p. 25
Nov. 2024	Idaho Power signs the Micron fab special contract while already short. Staff: "By accepting the additional Micron FAB load during that time... the Company significantly compounded its time problem."	Staff Comments p. 16

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When	What Idaho Power or the record said	Source
2025 IRP	Need rises to 192 MW in 2029 and 380 MW in 2030, with a shortfall over 1,000 MW by 2040.	Reply p. 4
Oct. 2025	The Milner battery bid comes back as a 222 MW gas plant. Stated reasons: lost 30 percent tax credit and the 2025 IRP's call for dispatchable power.	Hackett Direct pp. 25 to 26
Mar. 10, 2026	Bennett order: "the Company's system faces a capacity deficit" in 2028. Staff had cited a 265 MW deficit for 2028.	Order 36958
Mar. 10, 2026	South Hills application: 2029 deficit of 236 MW, after counting two contracted resources as online.	Staff Comments p. 5
June 2026	Public pitch. Hackett to KMVT: "We've been in a state of growth in southern Idaho and eastern Oregon for many years." Prescott to KIVI: load growth "across-the-board," and the plants are "to serve the customers within our service territory within the Magic Valley."	KMVT June 17; KIVI June 26
July 31, 2026	Staff: large customers are 88 percent of 2026 to 2030 growth; Micron alone about 445 aMW. Staff asked for a study without Micron. The company declined.	Staff Comments pp. 14 to 15
Aug. 14, 2026	"The Company does not dispute that large loads are contributing to the capacity needs. But Idaho Power strongly disagrees that by committing to serve these large loads, Idaho Power 'compounded its inability to get resources online in time.'"	Reply p. 13
Oct. 29, 2026	Investor call: preliminary 2027 IRP load growth of 8.9 percent a year for five years, about 19,000 GWh in 2027 rising to about 29,000 GWh by 2032; about 4,000 MW of large loads in the pipeline plus 3,000 MW of newer inquiries; residential "right around a percent" of the growth.	Q3 call (third-party transcript)

What the record shows. The need number has moved in every filing, and the explanation moved with it. In 2023 the gap was met with clean resources and a battery at Milner. By 2026 it was a gas plant at the same spot, sold locally as Magic Valley growth while the company's own reply concedes large loads are part of the need. Staff's line is the plainest summary: the company "has been chasing the capacity deficit continuously since 2021."

Still to pull: the 2017, 2019 and 2021 IRPs for the earliest dates Idaho Power said it had enough capacity (old links return errors; ask the PUC or Idaho Power), and Jeff's article and post.

Related PUC cases

Case	Date	What it is and why it matters here
IPC-E-26-04	Nov. 17, 2026	Public comment from Jeff A. Pierson, posted as COMMENT_1 (Laserfiche 178358). Case page last updated Oct. 2. No final order.
IPC-E-26-09	Nov. 18, 2026	Final Order 37231 grants CPCNs for Gateway West Segment E-8, a 133-mile, 500-kV line from Midpoint substation to Hemingway, adding 2,000 MW of transfer capacity and connecting to a new Mayfield substation. Conditions: costs tagged separately, a confidential soft cost cap, and quarterly confidential load-growth forecasts "regardless of the size of the load and if there is a signed agreement in place or not." IIPA intervenor funding $5,970.20. Reconsideration window 21 days. Watch for the same conditions in the South Hills order.

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Case	Date	What it is and why it matters here
IPC-E-26-31 / PAC-E-26-15	Filed Nov. 17, 2026	Idaho Power and PacifiCorp transmission asset exchange tied to Boardman-to-Hemingway. Includes Magic Valley 345-kV assets (Kinport-Midpoint, Borah-Adelaide-Midpoint). Order requested by Aug. 31, 2027. One exhibit confidential.
IPC-E-26-26	Nov. 18, 2026	Order 37234 sets modified procedure on a revised marginal cost pricing framework covering Micron's new fab (Schedule 28), Chobani (proposed Schedule 35) and future Schedule 20 loads. Order prints comments due "January 8, 2026" and reply "January 29, 2026." Read as 2027 and confirm with the Commission Secretary.
IPC-E-26-19	Order Sept. 8, 2026	Chobani energy services agreement and Schedule 35. Chobani could move from 20,000 kW up to 40,000 kW of contract demand. Comments due Dec. 17, 2026. Idaho Power wants a final order by Mar. 1, 2027. This is the one Magic Valley large load on file. The application file wouldn't download and needs a hand pull.
IPC-E-26-07	Nov. 13 to 18, 2026	Allen testimony errata and six revised model exhibits (Nov. 13); public comment batches Nov. 17 and 18. Schedule (Order 37170): Staff and intervenor testimony Nov. 25; public comments Dec. 14; all-party testimony Jan. 13, 2027; hearing Jan. 19 to 21, 2027.

Where the parties stand

Party	Position	Main points
Idaho Power	Approve both CPCNs; early AFUDC; no cost cap	Deficit of 236 MW in 2029 and 352 MW in 2030; gas beat remaining battery bids by a redacted dollar figure over 20 years; lead times forced early commitments
PUC Staff (Kelsea Ross, DAG; Matt Suess, Kimberly Loskot, Steven Verdieck, Karla Ducharme)	Approve both, with conditions	RFP misused for South Hills, skipped for Peregrine; Micron is main driver; hard caps; deny early AFUDC; slow new large-load sign-ups; tag all costs
Idaho Irrigation Pumpers Assn. (Eric Olsen)	Does not contest CPCNs	Wants the record clear for later cost allocation; notes no modeling of large-load contribution and thin gas-price sensitivity; sought intervenor funding
NW Energy Coalition and Renewable Northwest	Deny	Neither plant went through an independent evaluator or shortlist; 652 MW exceeds the stated need; gas costs understated, storage overstated; pipeline and fuel price risk
Micron Technology	Intervened	No comments posted in the case file list
City of Boise	Opposes (public comment)	Puts Boise's and Idaho Power's 2045 clean energy goals at risk; wants more risk analysis

Public comments

Staff counted 152 written customer comments by July 31, "all" opposed. Idaho Power counted 186 by August 4. Most are form letters. A large share came through a Sierra Club service (KnowWho / phone2action), with the same paragraphs on cost, uncertain load forecasts, full pipelines, and batteries, and a line telling the PUC to "put the onus on Big Tech."

Themes Staff listed: rates and fuel costs, air quality and greenhouse gases, whether the load forecast is real, pipeline capacity, battery and solar alternatives, data centers pushing costs onto households, Idaho Power's clean energy goal, rooftop solar compensation, and public health.

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Local voices are thin. In the posted batches, Magic Valley addresses turned up from Kimberly, Twin Falls, and Bliss, plus several from Hailey and Sun Valley. The Kimberly, Twin Falls, and Bliss entries are the Sierra Club form letter. One Twin Falls writer called the plants "near Mountain Home and Burley." No Murtaugh or Hansen address was found.

Notable individual comments:

- Wild Idaho Rising Tide filed a long two-part comment. It names the Milner site, ties the plants to Williams' Silver Spur and GTN Xpress gas, and says its spring 2026 searches "yielded little public information" beyond PUC and Idaho Power websites.
- A Nampa engineer argued the comparison should be gas against a solar, wind, and storage portfolio sized to the same firm capacity, over a 30 to 40 year asset life.
- A Hailey commenter from what she called an eight-generation southern Idaho family asked the PUC to deny gas plants "specifically near Mountain Home or Twin Falls."
- One Boise resident supported both plants as dispatchable, efficient, and a hedge against the higher rates seen in states that leaned hard on wind and solar. That was the only supportive comment found.

Note: opposition in the docket is organized and mostly from outside the Magic Valley. The silence from Murtaugh, Hansen, and the canal companies may mean nobody local knows the details yet.

Since then, the only new filing in the case is Jeff A. Pierson's public comment, submitted Nov. 16 and posted Nov. 17, 2026 (Laserfiche 178358).

Other power projects at or near Milner

Project	Size	Status
Milner Hydro (Idaho Power)	59.5 MW	Operating since 1992; water drawn through Twin Falls Canal outside irrigation season; FERC P-2899
GI queue #797 (Idaho Power origination; technology not stated)	19.26 MW	Feasibility study Nov. 25, 2025; system impact study Mar. 23, 2026; Milner 138 kV; requested online Apr. 1, 2029; non-binding POI estimate about $4.23 million
GI queue #798 (South Hills)	222 MW	Queued Mar. 11, 2026 at Milner 138 kV; Material Modification Assessment Nov. 5, 2026 found a tie-line change not material; may be folded into Cluster 2. Interconnection.fyi lists it active
GI queue #796 (Idaho Power origination)	19.26 MW	Mayfield 230 kV; requested online Apr. 1, 2031; system impact study Mar. 23, 2026
Milner Dam Wind Park (Idaho Wind Partners)	about 50 GWh/yr	Operating since 2011, Cassia County near Burley
Milner Butte landfill gas (Southern Idaho Solid Waste)	3 x 1.3 MW	Operating, Cassia County
Silver Spur pipeline (Williams), FERC PF26-15	275,000 Dth/d	Pre-filing approved Sept. 24, 2026; scoping session Twin Falls Dec. 9, comments due Dec. 14; tie-in near Twin Falls, Buhl compressor work; does not run to Milner

Accountability findings

The accountability repository (Research_Claude_Accountability_2026-11-18) tests 21 findings against the public record. Each has its own dossier with chronology, evidence for and against, legal and ethical implications, records to request and reforms. Severity runs S1 (critical) to S5

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(undetermined). Evidence runs A (primary record read directly) to E (inference). No finding reaches S1.

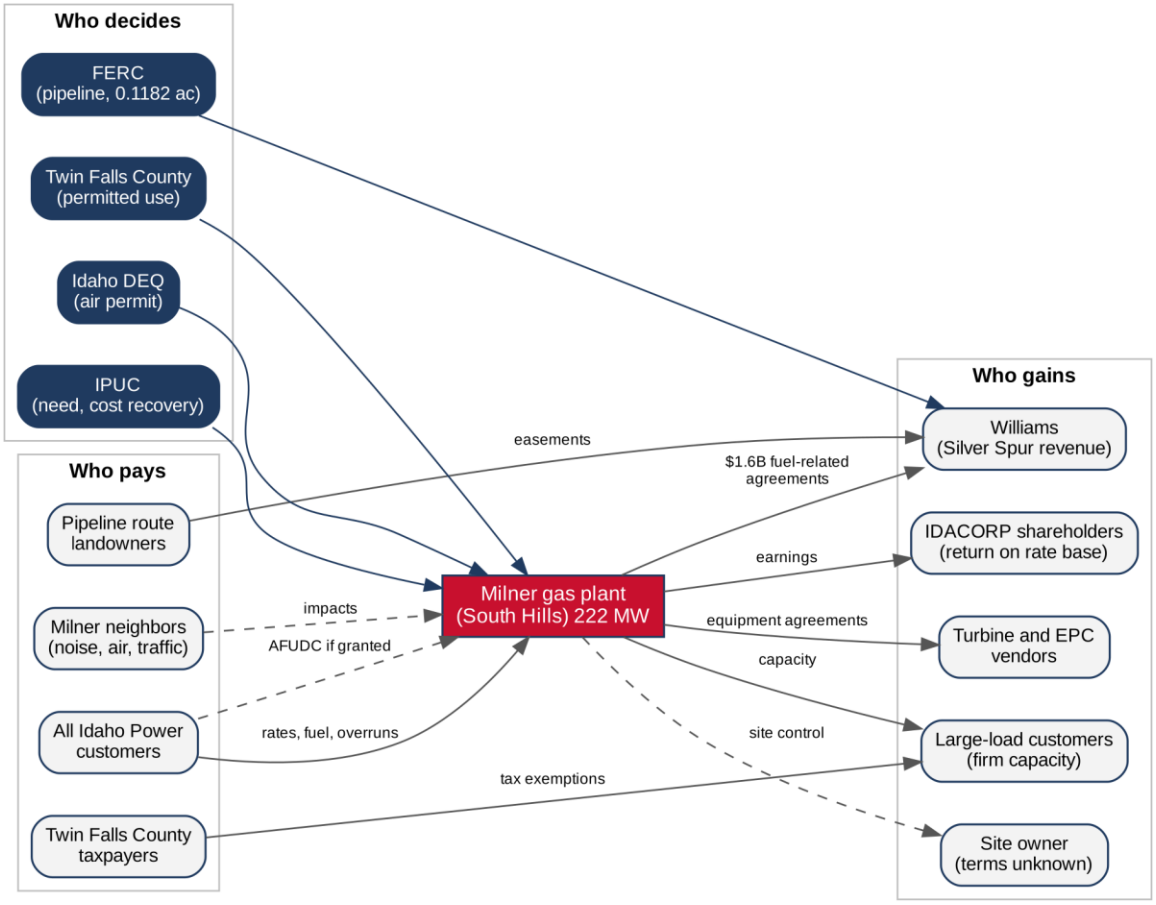
ID	Finding	Sev.	Ev.	Status	Update since the repository
AF-01	The battery bid that became a gas plant after the shortlist	S2	A	Procedural deficiency per Staff; disputed; not adjudicated	Unchanged
AF-02	Peregrine awarded outside any RFP, with money down first	S2	A	Procedural deficiency per Staff; disputed	Unchanged
AF-03	Idaho's new RFP rules: no waiver sought	S3	A	Disputed legal question	Unchanged
AF-04	Money committed before approval	S2	A	Legal, possibly against the public interest	Capex remark was about the 2031 and 2032 plants (transcript checked)
AF-05	Local growth pitch versus the load data	S2	A	Documented ethical concern	Unchanged
AF-06	A capacity deficit chased since 2021	S3	A	Regulatory concern	Unchanged
AF-07	A new name, and notices that never say Milner	S3	A	Transparency concern; legal minimum met	Unchanged
AF-08	No public hearing at any level, while Peregrine and SWIP-North got one	S2	A	Procedural concern; hearing request unresolved	Unchanged
AF-09	Permitted by right: the county's unwritten call	S2	A	Potential violation requiring legal review	Unchanged
AF-10	Private briefings for the commissioners	S3	A	Ethical concern; no violation	Williams' March outreach corroborated by draft RR1 (B)
AF-11	The FERC boundary filing: who was told	S3	A	Procedural concern; no violation	Unchanged
AF-12	Air permit timing and the public wording	S3	A	Credible concern; rises to S2 if work starts without a permit or exemption	Page wording read Nov. 19; Bennett page says before construction
AF-13	Gas supply: a 2029 plant on a 2030 pipeline	S2	A	Credible concern	175,000 Dth/d supported by draft RR1 mirror copy (B)
AF-14	Who carries the cost risk	S2	A	Legal, possibly against the public interest; pending	Order 37231 read: soft cap, cost tagging, quarterly load forecasts
AF-15	Growth pays for growth, except for contracts signed before July 2026	S2	A	Legal; policy concern	Unchanged

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ID	Finding	Sev.	Ev.	Status	Update since the repository
AF-16	Milner hydro's water permit history	S3	A	Resolved by 2022 consent judgment	Consent judgment read Nov. 19
AF-17	A regulator that finds problems and approves anyway	S3	C	Structural concern; capture not shown	Unchanged
AF-18	Company-owned gas keeps winning the company's RFPs	S3	C	Pattern concern	Unchanged
AF-19	Tax breaks for new load, and a hazard plan that skips the plant	S4	A	Lawful; policy concern	Unchanged
AF-20	Who controls the 20 acres	S5	A	Insufficient evidence	Answered in part: Z2026-0001 moved 19.877 acres to Idaho Power, final May 18, 2026. Price and deed still unknown
AF-21	Corruption and conflicts screen	S5	E	Nothing found in records reviewed	Idaho Power's lawful $10,000 to Gov. Little's 2026 campaign confirmed in Sunshine reporting; lobbying records still not pulled

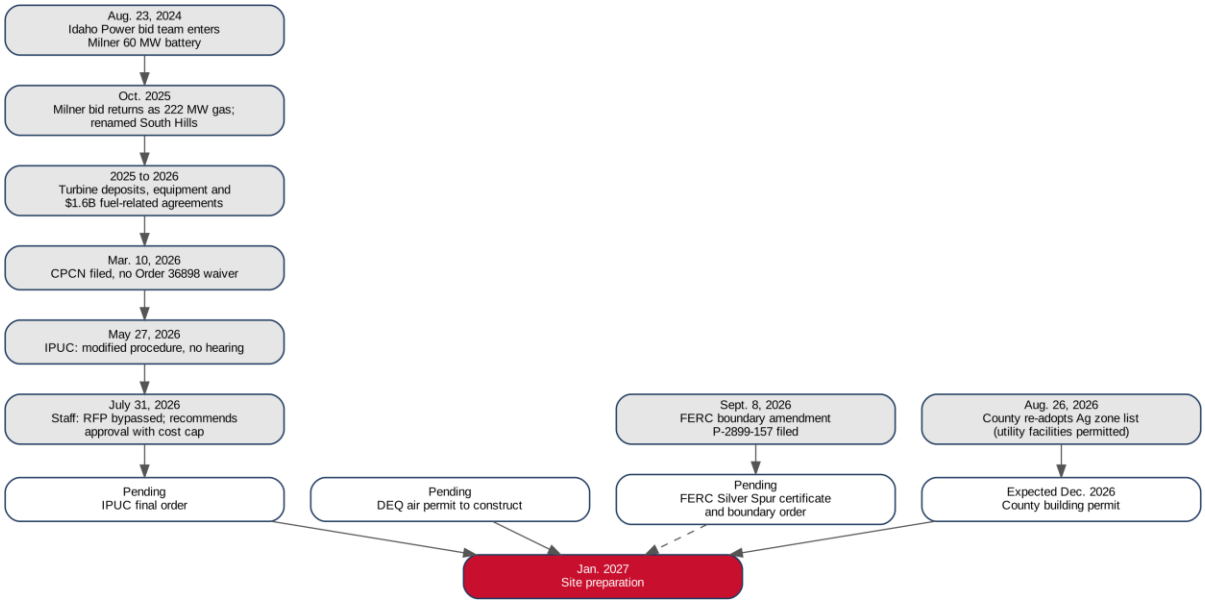
The repository also holds a statements-versus-records matrix, a records request package grouped by agency, an exculpatory evidence report, a jurisdiction guide, a reform list and an adversarial review. Read the adversarial review before publishing anything from this briefing.

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Money and risk around the Milner gas plant. Solid lines are documented. Dashed lines are expected under normal ratemaking but not yet ordered.

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Who decided what, in order. Gray boxes are decisions already made. Outlined boxes are pending.

A parallel accountability review (Accountability Rev06)

Another research session built its own accountability repository the same night (Milner_2026_Accountability_Rev06, with a Rev06 executive summary in the Briefings folder). It numbers 25 findings differently and rates five high severity. It reaches the same bottom line: no bribery, graft or crime. That session reports checking its quotations and legal citations against originals. These points from it add to or sharpen this briefing and weren't rechecked here:

- **Staff's full position.** Staff also finds the two plants are the least-cost, least-risk options, which is why it recommends approval. Idaho Power answers that its process was "not in direct contravention of the Commission's orders."
- **Oregon waiver history.** Idaho Power asked Oregon in December 2021 to waive its bidding rules for its 2022 RFP. Order 22-081 (Mar. 11, 2022) found no good cause to waive all of the rules and allowed a modified process. Order 24-120 (April 2024) granted a partial waiver in UM 2317, the docket for the RFP that produced the Milner bid. Both orders were checked on the Oregon PUC site.
- **Bennett Mountain contrast.** Bennett came through the 2028 RFP, which the Commission found fair and reasonable. Staff contrasts it with South Hills and Peregrine.
- **Micron as the main cause.** Staff wrote that the "Micron FAB load is the main cause of the 2027-2030 capacity deficits," and that the large-customer class, which holds Micron, Meta and others, is "88 percent of the load growth between 2026 and 2030."
- **Overrun protection.** Idaho Power says its supply and construction contracts carry overrun protections. Staff found the only contractual protection is in EPC agreements, which "only address a portion of the overall project value" (Staff Comments p. 18).
- **Peregrine noise.** Elmore County's staff report says a preliminary study shows the 58 dBA limit is likely achievable, even though Idaho Power sought a variance to 75 dBA at 750 feet.
- **HB 911 reach.** Idaho Code 61-335 covers new loads of 50 MW or more under contracts signed on or after July 1, 2026. Micron's November 2024 fab contract falls outside unless amended. A Micron Fab 2 agreement, still unsigned on Oct. 29, would fall inside. Staff cites the same statute to support assigning these plants' costs to large loads.

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- **Political giving.** Idaho Power gave $10,000 to Gov. Brad Little's 2026 campaign, one of his largest donors in Idaho Sunshine data reported by the Coeur d'Alene Press (Oct. 15, 2026). Rev06 adds that Idaho Power has given to a PAC supporting him (not rechecked here). Little appointed all three commissioners, who are Senate-confirmed. The giving is lawful and disclosed, and nothing ties it to any decision.
- **Closed deliberation.** The Commission deliberates contested cases in closed session, as Idaho law allows.
- **Unequal resources.** Customer advocates work on small budgets against utility legal teams funded through rates. IIPA's intervenor funding award in the Gateway West case was $5,970.20.
- **Capital forecast quote.** Rev06 removed the CFO's capital-forecast quote after its own review. The transcript shows the remark was about the 2031 and 2032 plants.

Legal analysis

Twin Falls County land use

This section explains the law that applies. It isn't legal advice, and several of these questions are unsettled.

1. Is a gas plant a "public utility building or facility"?

The case that it is. Idaho Power is a regulated public utility. The county's definition of "utility" covers any company supplying electricity to the public. The plant would serve Idaho Power's customers, and the PUC is deciding whether it's needed. Counties often treat utility infrastructure as permitted everywhere because it has to go where the system needs it.

The case that it isn't. The words are "buildings and facilities," listed next to farm stands and private stables. The code has no category for electric generation of any kind, and when the county did regulate generation, wind and solar, it required a conditional use permit for every project. A reading that lets a 222 MW thermal plant in by right, while a 5-acre solar array needs a hearing, is hard to square with the code's own structure.

The governing case. In *Gardiner v. Boundary County Board of Commissioners*, 148 Idaho 764 (2010), Boundary County tried to fit a commercial gravel pit into a listed category ("commercial businesses supplying products and services for agricultural and forestry activities"). The Idaho Supreme Court said a use has to be prescribed in the ordinance: "The statute requires the use, not the permit, to be 'conditionally permitted.'" It voided the county's catch-all provision as "an 'anything goes' provision." Twin Falls County's own Community Development page says its zone use lists are "limited by Idaho Code § 67-6521(a) and the Idaho Supreme Court's Gardiner v. Boundary County decision."

Gardiner dealt with a special use permit. The same logic applies to stretching a permitted-use category to cover a use the ordinance never names. Whether "public utility buildings and facilities" reaches a gas plant is the question a court would ask.

2. Notice and hearing rights

- **Special use permits** require a public hearing, published notice at least 15 days ahead, a sign posted on the property and mailed notice to owners within 300 feet (Idaho Code 67-6512(b)). Permitted uses get none of that.
- **A petition for a hearing.** Idaho Code 67-6521(1)(b): "Any affected person may at any time prior to final action on an application required or authorized under this chapter, if no hearing has been held on the application, petition the commission or governing board in writing to hold a hearing ... provided however, that if twenty (20) affected persons petition for a hearing, the

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hearing shall be held." Whether a building permit for a use the county calls permitted counts as an application "required or authorized under this chapter" is unsettled. A zoning compliance determination arguably is one. At a minimum, a petition forces the county to answer in writing.

- **Who is an "affected person."** "One having a bona fide interest in real property which may be adversely affected" (67-6521(1)(a)). In *Crookham v. County of Canyon* (Jan. 2026) the Idaho Supreme Court held that this statutory standard, not the stricter three-part federal test, controls standing in land use cases. Neighbors near Milner Road would likely qualify.
- **Judicial review.** Under 67-6521(1)(d), an affected person aggrieved by a final decision may seek judicial review within 28 days after exhausting local remedies. The listed decisions are subdivisions, variances, special use permits, zone changes and "such other similar applications." Building permits sit at the edge of that list. A written zoning determination would be easier to review than an unwritten one.
- **Local appeal.** The county posts an appeal form, and the commissioners hear appeals of P&Z decisions (one such appeal hearing was noticed Nov. 9, 2026). The appeal deadline for a staff zoning determination needs to be confirmed from Title 8.

3. Open meetings

The Feb. 11, Apr. 20 and Apr. 27 meetings were listed on posted agendas, so they appear to have been open meetings under Idaho Code 74-203. Idaho Code 74-205 requires minutes to record members present, motions and their disposition, and votes. It requires no summary of discussion. Topic-line minutes for a briefing with no motion meet the legal minimum. These records show no open meeting violation.

4. Ex parte contacts, if the plant comes back before the commissioners

Granting or denying a specific land use application is quasi-judicial (*Cooper v. Board of County Commissioners*, 1980). In a quasi-judicial matter, Idaho courts require decision-makers to confine themselves to the public record and to disclose ex parte contacts. *Idaho Historic Preservation Council v. City Council of Boise* (2000) overturned a decision because council members took undisclosed phone calls. *Eacret v. Bonner County* (2004) vacated a variance in part because a commissioner didn't disclose his conversations with the applicant.

The 2026 briefings weren't ex parte contacts when they happened, because no application was pending before the board. If a neighbor appeals a building permit or zoning determination for the plant, the commissioners would sit as the appeal body. At that point, fairness and Idaho case law would call for them to put on the record what Idaho Power told them in February and April. The Idaho Association of Counties' January 2026 training lists "ex parte contact not disclosed" among the common legal pitfalls for county officials.

5. The tax exemption

Idaho Code 63-602NN lets a county exempt all or part of the added value of a qualifying plant investment for up to five years. The White Buffalo action appears to be within the board's authority. The legal question is settled. The policy question isn't.

6. What stays outside county control

The county can't decide whether the plant is needed (PUC), set its air limits (DEQ) or release the FERC strip. It does control land use: zoning interpretation, the building permit, approach permits and its own emergency planning. That's the piece no other agency covers.

State and federal questions

The RFP orders (AF-01 to AF-03). Order 32745 bound Idaho Power to Oregon's bidding rules (OAR 860-089) through Jan. 1, 2026. Oregon allows an exception for a "time-limited opportunity to acquire a resource of unique value" on a report, not approval, and Idaho Power filed that report April

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9, 2026. Order 36898 took effect Jan. 2, 2026 and requires a waiver application explaining "why the normal RFP process should not apply." Idaho Power says the order doesn't reach a solicitation begun in 2024. Rocky Mountain Power asked for a waiver under the same order and got one (Order 37049). No regulator has ruled that Idaho Power broke either order. Staff's finding is a recommendation to the Commission.

The hearing request (AF-08). Under the PUC's Modified Procedure rules (IPUC Rules 201 to 204), a person who wants a hearing must ask in a written comment and explain why comments alone aren't enough. Wild Idaho Rising Tide did. If the Commission never ruled, that's a procedural point for a petition for reconsideration under Idaho Code 61-626, which runs 21 days. IPUC Rule 331 refers to the service date. Use the earliest defensible date once a final order issues.

The air permit (AF-12). IDAPA 58.01.01.201 requires a permit to construct before construction of a regulated source begins, with limited exceptions (Section 213 allows some pre-permit construction with DEQ approval). Idaho Power's South Hills page says DEQ would issue the permit "before the plant begins operating." Its Bennett Mountain page says the permit "must be approved before construction can move forward." The Bennett page states the rule correctly. Nothing has been built. If site prep in January 2027 counts as construction and no permit or exception is in place, that becomes a compliance question for DEQ.

FERC notice (AF-11). 18 CFR 4.202(a) requires public notice when FERC finds an amendment is a significant alteration. A 0.1182-acre non-capacity boundary change may not qualify. FERC hasn't published notice. That's a fact about FERC's choices, not a rule broken.

The pipeline. If FERC certificates Silver Spur, the Natural Gas Act gives Northwest Pipeline the right of eminent domain over landowners on the route. FERC rehearing, then a federal court of appeals, is the review path.

Cost causation (AF-15). HB 911, now Idaho Code 61-335, protects other customers from the costs of new loads that add 50 MW or more within any 60-month period, but only under contracts signed on or after July 1, 2026. Micron's fab contract (Nov. 2024) and Meta's predate it. A Micron Fab 2 agreement, unsigned as of Oct. 29, would fall inside. IPC-E-26-07 decides how costs are assigned under existing tariffs.

Securities disclosure (AF-04, AF-13). IDACORP disclosed the fuel and equipment commitments in its 10-Qs. Nothing reviewed suggests a disclosure violation.

This section and the county section above explain the law as found in public sources. Neither is legal advice.

Ethical analysis

In Twin Falls County

Access. Idaho Power got two scheduled sessions with all three commissioners in a year the plant was taking shape. Williams got one. The people who live along E 3610 N got none. No rule broke. But the people with the most at stake had the least access, and the county's records can't show what the board was told.

Candor. The February meeting was billed as "Battery Storage Facilities." By then Idaho Power's Milner project was a gas plant, by its own testimony. Maybe batteries elsewhere really were the topic. The commissioners should say whether the Milner gas plant came up, and when they first heard of it.

Consistency. The county wrote rules that make every solar array go through a hearing because "unregulated wind and solar energy projects present an imminent peril to the public health, safety, and welfare." It hasn't applied the same caution to a 222 MW gas plant. Free markets need one set

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of rules for every power plant, and they need the company that profits to carry its own costs, including the cost of facing its neighbors.

Accountability. If someone at the county decided a gas plant is a public utility facility, that decision should be in writing, with a name and a date, where a citizen can find it and appeal it. A permitted-use reading that lives in a staff conversation is government by default.

Timing. The commissioners reopened the Agricultural Zone's permitted-use list two months after local TV reported the plant, and left the utility line in place without a word about it. That may have been a deliberate choice, or nobody may have connected the two. Either way the public was owed the conversation.

Incentives. The county is granting tax breaks to new industry that's waiting on Idaho Power capacity, while Idaho Power builds capacity largely for large industrial loads and asks every ratepayer to carry it. Both are lawful. Together they're the pattern this whole project is about: growth subsidized from the top, and the bill handed to the people already here.

At the PUC and with investors

A contest the company judges. Idaho Power ran the RFP, entered its own bid, changed that bid after the judging and awarded Peregrine to itself with no RFP. On Oct. 29 it told analysts two more company-owned gas plants topped its 2032 RFP. Staff's own standard says it best: if a self-build bid can change after judging, competition is "meaningless."

The decision made before the decision. Engines reserved, deposits paid, equipment and fuel agreements signed, construction interest requested from December 2025. Staff accepts the procurement timing. The trouble is what it does to the regulator: a denial now comes with a cancellation bill.

Two audiences, two stories. Magic Valley viewers heard local growth. Investors heard large loads, a 4,000 MW large-load pipeline and "right around a percent" residential. Both can be true in part. Only one audience got the numbers.

Secret costs. Ratepayers will pay for a plant whose price they're not allowed to see. Trade-secret rules allow it. A non-confidential summary, a cost per kilowatt with a range, would cost the company nothing competitive and let the public judge the bargain.

Holding critics to the same test. "The fence line moves onto federal ground" overstated the FERC filing and should be retired. Single-source figures carry their source until checked.

How the public can still weigh in

Where	What	When	How
FERC, P-2899-157	Comment on the 0.1182-acre boundary change	Any time	FERC eComment, reference P-2899-157; sign up for eSubscription to see any notice the day it posts
FERC, Silver Spur PF26-15	Scoping: route, compressor noise, Twin Falls County tie-in, Power County listing, eminent domain	Sessions Dec. 8 (Wells, Nev.) and Dec. 9 (Twin Falls, 5 to 8 p.m.); written comments due Dec. 14 (3 p.m. Mountain)	eComment or in person; one-on-one with a court reporter
IPUC, IPC-E-26-07	Who pays for large-load growth	Public comments due Dec. 14; hearing Jan. 19 to 21, 2027	PUC online comment form

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Where	What	When	How
IPUC, IPC-E-26-19	Chobani energy services agreement and Schedule 35	Comments due Dec. 17	PUC online comment form
IPUC, IPC-E-26-26	Marginal cost pricing for Micron, Chobani and future large loads	Comments due Jan. 8, 2027 (order prints 2026); reply Jan. 29	PUC online comment form; confirm the year with the Commission Secretary
IPUC, IPC-E-26-04	South Hills and Peregrine final order	Within 21 days after the final order	Petition for reconsideration (Idaho Code 61-626)
Idaho DEQ	South Hills permit to construct	When noticed (Bennett's ran 30 days)	Written comment; ask for a hearing in the Magic Valley
Twin Falls County	Zoning determination, building permit, records	Now, and before the December building permit	Records requests to pandz@tfco.org and commiss@tfco.org (Idaho Code 74-102); written request for a zoning determination; 20-person hearing petition under Idaho Code 67-6521(1)(b), scope unsettled; local appeal of any written decision
Sign-off bodies	Approach permit, canal and irrigation sign-offs	Before the building permit issues	Murtaugh Highway District, Milner Irrigation District, Twin Falls Canal Co. board meetings
Legislature	Siting review for large thermal plants; extending HB 911 to existing contracts	2027 session	Contact district legislators

Other leads from the gap audit

Summarized from Milner_2026_Gap_Audit_Rev03 (parallel session, Nov. 18). Not rechecked for this addendum.

- Air permit timing. Idaho Power lists site preparation January 2027 and construction March 2027, but says DEQ would issue the permit to construct "before the plant begins operating." Idaho rules (IDAPA 58.01.01.201) generally require the permit before construction, with listed exceptions. Ask DEQ whether an application is in, whether the source is major or synthetic minor, and what public notice is planned. This is a question, not a finding of a violation.
- EPA rule proposals. IDACORP's Oct. 29 10-Q says EPA's May 2026 proposed new source review revision could speed new gas generation if adopted and carried out by Idaho DEQ. EPA also proposed changes to minor-source public participation July 1. Both are proposals.
- Construction stormwater. A 20-acre site will likely need construction stormwater coverage (notice of intent and a SWPPP) from DEQ. Search for the notice of intent. A Milner Butte landfill permit already shows in DEQ's portal. Don't mix it up with this plant.
- Milner hydro water permit history. The April 13, 2022 consent judgment in Twin Falls County case CV42-22-1195 says Milner's 1992 hydroelectric addition never had an NPDES permit. DEQ's current plan lists Milner among pending hydro general-permit applicants. This is history of the hydro plant, not evidence about the gas plant.
- Power County. FERC's Silver Spur web page lists Power County. The scoping notice doesn't. Ask FERC or Williams why.

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Corrections and cautions before anything goes public

- "The fence line moves onto federal ground" (headline of Post 2 in "Milner FERC Boundary - Posts Script Announcements rev 1") is not supported. The 0.1182 acres is inside a federal license boundary. The filing says Idaho Power owns it. Change the headline to something like "A strip comes out of the federal hydro boundary."
- FERC doesn't have to publish notice for every non-capacity amendment. 18 CFR 4.202(a) requires notice when FERC finds a significant alteration. Say FERC hasn't published a notice, not that it broke a rule.
- Silver Spur: say NGI reported Idaho Power signed for 175,000 Dth/d. Don't say how much of that goes to South Hills.
- No permit violation is established for the gas plant. Frame the air permit and stormwater items as questions.
- Capacity: 222 MW is the filed nameplate. Idaho Power's web pages also say 220 MW. Use 222 MW and cite the application.
- Reconsideration clock: Idaho Code 61-626 runs from the order date, and IPUC Rule 331 references the service date. Use the earliest defensible date once a final order issues.
- Earnings call names: the transcript service garbles some speaker names. Attribute to the CEO and CFO by title, and to "an Idaho Power executive" otherwise.
- The 175,000 Dth/d figure: say NGI reported it and a draft resource report supports it. Don't say how much of it goes to South Hills.
- The CFO's "not in that CapEx forecast" remark was about the 2031 and 2032 plants. Don't apply it to South Hills or Peregrine.
- The Feb. 11 county briefing was billed as battery storage. Don't say the commissioners were misled. Say the agenda line didn't mention a gas plant.
- "Right around a percent" comes from a third-party transcript and could mean one percent or one percentage point. Check the webcast.
- The 88 percent figure is Staff's number for the whole large-customer class, not data centers alone.
- Parcel sizes: the county's lot line description and the 2025 GIS roll disagree. Pull the staff report first.
- The whistleblower suit against the PUC (October 2025) is about other cases. Leave it out of any South Hills piece unless the caveat comes with it.
- No corruption was found. No headline should imply it.
- An AI research packet gave Feb. 29, 2024 as the RFP start. That's the date of an unrelated Idaho Power filing (the Rock Creek II hydro contract, IPC-E-24-09). It's been dropped from the timeline.
- "5200 N E Road" in Idaho Power's site description doesn't match a road on county maps. Use Milner Road and E 3610 N.
- Idaho Power moved its South Hills page. The old address returns a 404 error. One version of the page says 220 MW, another 222 MW. Save dated copies of both current addresses before quoting.
- IPC-E-26-11, cited in some research packets, is an unrelated customer complaint. Don't cite it for South Hills.

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Open questions

Answered since rev 4

- Who holds the land: Idaho Power, through lot line adjustment Z2026-0001 (final May 18, 2026). Price and deed still open.
- Whether the fenced yard reaches into the FERC boundary: yes, 0.1182 acres (P-2899-157).
- Whether Idaho Power is a Silver Spur shipper: reported yes, 175,000 Dth/d (NGI), supported by a draft resource report. Confirm against the FERC original.
- Whether the PUC is putting conditions on Idaho Power projects this fall: yes, Gateway West Order 37231.
- Whether the CFO meant South Hills when he said "not in that CapEx forecast": no, he meant the 2031 and 2032 plants.
- Whether Idaho Power's page puts the air permit before construction: no, it says "before the plant begins operating."
- Whether the county held any hearing: none found in 1,207 county PDFs.

Still open

- Did the Commission ever rule on Wild Idaho Rising Tide's hearing request?
- What's the site's zone, and who decided a gas plant is a permitted use there, when and in writing where?
- When did the county commissioners first hear about a gas plant at Milner, and from whom? Did it come up Feb. 11 or Apr. 20?
- What did Idaho Power pay for the 19.877 acres, and when did the deed record?
- Has Idaho Power filed its DEQ application, when, and is the plant a synthetic minor or a major source?
- Where does the plant's gas come from between June 2029 and Silver Spur's 2030 in-service date?
- What does the $1.6 billion fuel obligation buy, and from whom? What does the $218 million equipment commitment cover?
- Is any of the 0.1182 acres Article 414 riparian habitat?
- Who is behind interconnection request #797, and what technology?
- What is White Buffalo, how much power does it need, and is it the "unnamed" load anywhere in Idaho Power's forecast?
- Did Idaho Power hold the October 2026 "public meetings and community outreach" it listed, and where?
- What do Twin Falls Canal Co., Milner Dam, Inc., Milner Irrigation District and Murtaugh Highway District think? None has said anything in the PUC case.
- Why does FERC's Silver Spur page list Power County when the scoping notice doesn't?
- Did Oregon accept Idaho Power's time-limited exception report (UM 2434)?
- Why did Idaho Power decline Staff's request for a reliability study without Micron (Production Request No. 25)?
- How much did Idaho Power, IDACORP and Williams give to Twin Falls County officials and area legislators, and who lobbied on HB 911?

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Records and reports needed

Record	From	How	Why
Deeds, options, easements, leases on parcel RP10S21E296020 since 2023	Twin Falls County Recorder	Recorder search	Who controls the 20 acres
Zoning determination that a gas plant is a "permitted use," with zone and date	Twin Falls County P&Z, 208-734-9490	Public records request	Whether neighbors ever get a hearing
Building permit file (planned Dec. 2026)	Twin Falls County	Watch, then request	Site plan, stack heights, setbacks
South Hills Permit to Construct application, emissions, modeling	Idaho DEQ air quality	Public records request	Replace our estimates with real numbers
Bennett Mountain permit, statement of basis, modeling and response to comments. Phase 1 research reports DEQ lists Bennett as P-2025.0035, issued June 26, 2026 (not yet checked)	Idaho DEQ	Request or download	Same engines, same utility
Ammonia or urea storage plan	DEQ, fire district, county emergency planning	Ask	Neighbor and responder safety
Ruling, if any, on Wild Idaho Rising Tide's hearing request	IPUC	Ask the case attorney	Notice and hearing story
Final order, IPC-E-26-04	IPUC	Weekly check	Starts the 21-day reconsideration clock
Staff Production Request responses No. 8, 9, 25 and 45 (public versions)	IPUC	Request	Costs, AFUDC dates, the study Idaho Power declined
Oregon UM 2434 docket and any Oregon response	Oregon PUC	eDocs search	Whether Oregon accepted the exception
FERC P-2899-157 docket sheet, any notice or order	FERC eLibrary	Weekly check, eSubscription	Comment and intervention window
Counterparty and terms of the $1.6 billion fuel-related agreements signed April 2026 (May 2030 to May 2045)	IDACORP 10-K, IPUC filings, Idaho Power	Read the 2026 10-K when filed; written question	Whether it's Silver Spur capacity for South Hills and Peregrine
Chobani special contract, IPC-E-26-19, nonconfidential version and load ramp	IPUC	Download	Size and timing of the one Magic Valley large load on file
Silver Spur public pre-filing request (accession 20260901-5103)	FERC eLibrary, PF26-15	Download by hand	Purpose, route, customers named
Silver Spur draft Resource Report 1 and Summary of Alternatives (20261002-5084)	FERC eLibrary, PF26-15	Download by hand (33 MB)	Whether Idaho Power is a shipper; delivery points near Twin Falls

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Record	From	How	Why
FERC staff comments on draft Resource Reports 1 and 10 (20261102-3002)	FERC eLibrary, PF26-15	Download by hand	What FERC already asked Northwest to fix
FERC environmental inspection report, Milner Project (20260128-3086)	FERC eLibrary, P-2899	Download by hand	Article 414 habitat status before the boundary change
Earlier IRPs (2017, 2019, 2021) on capacity sufficiency	Idaho Power, IPUC	Download	Changing story on need
Noise study, stack height in feet, traffic plan, water balance	Idaho Power, Nate Murray	Written questions	Neighbor impacts
Dates and places of the October 2026 "public meetings and community outreach"	Idaho Power	Written question	Notice story
Canal company and Milner Dam, Inc. board minutes on the FERC amendment	Twin Falls Canal Co., North Side Canal Co.	Ask	Their position
Road use or access permits for construction	Local highway district	Ask	Traffic
Lot line adjustment Z2026-0001: approval letter, minutes, written decision, staff report	Twin Falls County permit portal (Citizens Connect)	Browser download	Parcel sizes, conditions, what the county was told about the use
Deed or recorded instrument for the 19.877 acres	Twin Falls County Recorder	Recorder search	Price and date
P&Z minutes and staff report for Z2026-0070 (June 11, 2026)	Twin Falls County P&Z	Records request	Whether anyone raised utility facilities when the Ag list was rewritten
Handouts and notes, Feb. 11 and Apr. 20 Idaho Power meetings; Apr. 27 Williams meeting; Reinke's Oct. 14 tour itinerary	Twin Falls County Commissioners	Records request	What the board was told
White Buffalo 63-602NN application and agreement	Twin Falls County	Records request	What it is and how much power it needs
Elmore County P&Z minutes Apr. 2, 2026 and CUP-2025-32 findings	Elmore County	Records request	How Peregrine's hearing went, for comparison
$218 million June 2026 equipment commitment	IDACORP, Idaho Power	Written question; 10-K	Whether it's South Hills engines
Idaho Power and IDACORP lobbyist reports, 2025 and 2026	Idaho Secretary of State	Online search	Who lobbied on HB 911
Campaign finance reports for Twin Falls County commissioners and area legislators, 2022 to 2026	County Clerk; Secretary of State	Online search and request	Utility and pipeline contributions

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Record	From	How	Why
IDWR well or water right application at the site	Idaho Department of Water Resources	Online search	Water use, which Idaho Power says is small
DEQ construction stormwater notice of intent	Idaho DEQ	Online search	Site prep timing
Milner hydro consent judgment, CV42-22-1195	Twin Falls County district court	Request copy	Read the primary record directly
Silver Spur pre-filing request (20260901-5103), draft RR1 and alternatives (20261002-5084), FERC staff comments (20261102-3002), status report (20261102-5234)	FERC eLibrary	Download by hand	Shippers, delivery points, FERC's questions
IDACORP Q3 2026 earnings webcast replay	IDACORP investor site	Listen	Confirm the "a percent" quote in the company's own recording before broadcast use

OSINT leads and methods

Treat each item here as a lead until a record confirms it.

- **Land.** SJA Land Co. LLC and AMC Rentals LLC share a Burley principal address, a Twin Falls P.O. box and a Dallas tax mailing address. Brown Milner IV, LLC owns about 435 acres west of the site. Pull sale dates and grantors from the recorder. Don't infer ownership from a registered agent's name or a shared address.
- **Two-mile ownership map.** Use the recorded legal description of the site, not the circle on Idaho Power's map. Buffer two miles, intersect county parcels, report ownership by category (private, corporate, utility, federal). Leave private homes and residents' names off any public map.
- **Imagery.** Library of Congress HAER ID-15 (Milner Dam and Main Canal) has historic photos usable for video. USDA NAIP aerials show the site field across years. Note dates and rights for each.
- **Hiring and equipment.** Idaho Power job postings for South Hills operators. Wartsila order announcements naming Idaho Power.
- **Money.** IDACORP 10-K, 10-Q and earnings calls for South Hills spending. Phase 1 research cites up to $7.2 billion of utility capital spending planned for 2026 to 2030 (not yet checked). That is company-wide, not South Hills cost.
- **Pipeline.** Williams investor materials for Silver Spur shippers and in-service date.
- **Stacks.** FAA obstruction filings, if any stack is tall enough to need one.
- **Compliance history.** EPA ECHO and DEQ records. Phase 1 research flags 2022 DEQ consent judgments on Idaho Power hydro facilities. That concerns hydro permits, not gas plants. Keep it separate.
- **After startup.** EPA greenhouse gas reporting would show real fuel use and emissions.
- **Comparable plants.** The Phase 2 research packet points to the Denton Energy Center in Texas, 12 engines and about 225 MW, running since 2018, where the city posts monthly emissions and start counts. That is the closest real-world picture of how a plant like South Hills runs. It also points to a 128 MW, seven-engine plant in Paris, Wisconsin, where state

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regulators required an environmental impact statement before approval in 2025. Neither is checked yet, and neither law transfers to Idaho.

- **Local voices.** No Murtaugh or Hansen address appears in the PUC comments. Local groups, canal shareholders and the fire district are the people to reach.
- **Leads from the Nov. 18 notes, not verified (keep off screen).** Oregon docket UM 2434 reportedly "closed without order Nov. 3, 2026" (ChatGPT report; the OPUC site didn't load). Brown Milner IV, LLC reportedly ties to Homestead Capital Farmland Fund IV through a shared San Francisco address (ChatGPT report; SEC page blocked). Commissioner Idaho Power tours reportedly on Oct. 13 and 14, 2026, plus an Oct. 15 incentive check (ChatGPT report; county minutes confirm only the Oct. 14 tour).
- **Interconnection.** #797 (19.26 MW, Milner, 2029) and #796 (19.26 MW, Mayfield, 2031) carry the cover line "Idaho Power Company - Origination," meaning Idaho Power's own merchant side. Technology isn't stated. A 19.26 MW Idaho Power project at Milner is worth one written question.
- **Equipment.** The $218 million June 2026 commitment runs through the first half of 2029, South Hills' build window. Ask Idaho Power what it covers.
- **Water.** Idaho Power's testimony says it needs a well permit from the Idaho Department of Water Resources (per a parallel research catalog, B). Search IDWR for a well or water right application at the site.
- **Stormwater.** A 20-acre site likely needs DEQ construction stormwater coverage. Search for the notice of intent. Don't confuse it with the Milner Butte landfill permit already in DEQ's portal.

Dates to watch

Date	Item
Any decision meeting	Final order on South Hills and Peregrine (IPC-E-26-04). Starts the 21-day reconsideration clock
Any time	FERC notice or order on the Milner boundary amendment (P-2899-157)
Nov. 25, 2026	Staff and intervenor testimony, IPC-E-26-07
Dec. 8, 2026	Silver Spur scoping session, Wells Combined School Cafeteria, Wells, Nev., 5 to 8 p.m. PST
Dec. 9, 2026	Silver Spur scoping session, 512 Main Ave. N., Twin Falls, 5 to 8 p.m. MST. The notice says "Mountain Valley High School"; the address is Magic Valley High School. Confirm with FERC. Also the 21-day reconsideration deadline on Gateway West Order 37231
Dec. 14, 2026	Silver Spur written comments due, 5 p.m. Eastern (3 p.m. Mountain). Public comments due in IPC-E-26-07
Dec. 17, 2026	Comments due on the Chobani agreement, IPC-E-26-19
December 2026	Planned South Hills building permit filing with Twin Falls County
January 2027	Planned site preparation
Jan. 8, 2027 (printed 2026)	Comments due, IPC-E-26-26 marginal cost pricing; reply Jan. 29
Jan. 13, 2027	All-party written testimony, IPC-E-26-07
Jan. 19 to 21, 2027	Technical hearing, IPC-E-26-07, Boise
Early 2027	IDACORP fourth-quarter call: updated capital forecast; 2026 Form 10-K

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Date	Item
Mar. 1, 2027	Idaho Power's requested decision date on the Chobani agreement
March 2027	Planned start of construction
March 31, 2027	Requested extension date for the Milner Dam monitoring well replacement (P-2899)
May 2027	Silver Spur certificate application planned (NGI)
2027	Independent Part 12D safety assessment of Milner Dam
Aug. 31, 2027	Requested order date, Idaho Power and PacifiCorp transmission asset exchange (IPC-E-26-31)
June 1, 2029	South Hills target online date
Second quarter 2030	Silver Spur target in service (NGI)
May 2030	Idaho Power's $1.6 billion fuel-related obligation begins

Who's who

People are listed by public role only. Titles are as given in the filings or coverage cited. Private landowners and residents aren't listed.

Idaho Power and IDACORP

Name	Role in this story
Lisa Grow	IDACORP CEO; Q3 call statements on the three gas plants and "Growth Pays for Growth"
Brian Buckham	IDACORP CFO; said on the Q3 call that the 2031 and 2032 plants aren't in the capital forecast
Adam Richins	Idaho Power executive vice president and COO; testified on gas supply and pipeline capacity
Eric Hackett	Idaho Power projects and resource development director; testified on the RFP and the rename; spoke to KMVT
Jared L. Ellsworth	Idaho Power witness on capacity need
Courtney Waites	Idaho Power witness on AFUDC
Brandon Prescott	Idaho Power spokesman to KIVI on local growth
Brady Lang	South Hills project manager, the contact on Idaho Power's page (blang@idahopower.com)
Nathan (Nate) Murray	Idaho Power; briefed the Twin Falls County commissioners Feb. 11 and Apr. 20, 2026
Andrew Downing	Peregrine project manager
Donovan E. Walker	Idaho Power lead counsel in IPC-E-26-04
Lisa C. Lance, Scott N. Pugrud	Idaho Power counsel on the FERC boundary amendment; Lance emailed the draft to agencies June 24, 2026
Ryan Adelman	Idaho Power vice president, power supply; signed the FERC application
Tim Tatum, Connie Aschenbrenner	Idaho Power regulatory contacts on PUC filings

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Name	Role in this story
Leon Letson	Listed Idaho Power contact on county applications Z2026-0001 and Z2026-0011

Idaho Public Utilities Commission

Name	Role
Edward Lodge	Commission president
John R. Hammond Jr.	Commissioner; former PUC lead deputy attorney general
Dayn Hardie	Commissioner; former PUC lead deputy attorney general
Kelsea E. Ross	Deputy attorney general, counsel for Staff
Matt Suess, Kimberly Loskot, Steven Verdieck, Karla Ducharme	Staff analysts on IPC-E-26-04
Adam Rush	Public information officer

Parties and commenters at the PUC

Name	Role
Idaho Irrigation Pumpers Association (Eric L. Olsen, counsel)	Intervenor; doesn't contest the certificates; wants a clean record for cost allocation
NW Energy Coalition (Benjamin J. Otto, Lauren McCloy) and Renewable Northwest (Aaron Menenberg)	Joint intervenors; ask the PUC to deny both plants
Micron Technology	Intervenor; the largest new load; no comments posted
Wild Idaho Rising Tide	Public commenter; asked for public hearings
City of Boise	Public commenter; opposes
Sierra Club	Ran the form-letter comment campaign
Jeff A. Pierson	Public commenter, Nov. 17, 2026

Twin Falls County

Name	Role
Commissioners Reinke, Hawkins and Matthews	Board of commissioners; land use appeals; adopted Ordinance 294; met Idaho Power and Williams in 2026
Former Commissioner Hall	Objected in Feb. 2025 to Idaho Power collecting interest during its assessment litigation
Planning and Zoning Commission and staff	Use classifications, building permits, Z2026-0001 and Z2026-0070
Emergency Services	2026 All Hazard Mitigation Plan
Stace Campbell, CTS	Consultant for White Buffalo on its tax exemption

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Pipeline and gas

Name	Role
Williams / Northwest Pipeline LLC	Owns the only interstate gas line into Idaho; Silver Spur applicant (PF26-15)
Michael Kukuk	Williams pipeline representative; on the county agenda Mar. 23 and met the commissioners Apr. 27, 2026
Intermountain Gas Company	Silver Spur shipper, 100,000 Dth/d
Ruby Pipeline	Receipt point in Elko County, Nev.

Land, water and the dam

Name	Role
Milner Dam, Inc.	Co-licensee of FERC P-2899 with Idaho Power; co-applicant on the boundary amendment; wholly owned by the Twin Falls and North Side canal companies, per a DOE/OSTI account of the 1988 to 1992 rebuild
Twin Falls Canal Co. (Jay Barlogi)	Received the FERC draft June 24, 2026; P&Z work session June 23; listed sign-off on county building permits
North Side Canal Co.	Milner Dam partner under the 1988 rebuild deal
Milner Irrigation District	On E 3610 N near the site; listed sign-off on county building permits
Murtaugh Highway District	Approach permits
South Central District Health	Septic sign-off on building permits
SJA Land Co LLC	Former owner of the 19.877 acres; Idaho LLC formed Nov. 7, 2023
AMC Rentals LLC	Shares SJA's addresses; holds nearby parcels
Brown Milner IV, LLC	Owns about 435 acres west of the site; no link to SJA found

State officials

Name	Role
Gov. Brad Little	Appointed all three PUC commissioners (Senate-confirmed); signed HB 911 on Apr. 10, 2026; received $10,000 from Idaho Power for his 2026 campaign (Idaho Sunshine, as reported by the Coeur d'Alene Press, Oct. 15, 2026)

Agencies

Agency	Role
Idaho Public Utilities Commission	Certificate of need and cost recovery
Idaho DEQ	Air permit to construct; stormwater; hydro water permits
Idaho Department of Water Resources	Well permit, per Idaho Power

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Agency	Role
FERC	Hydro license boundary; Silver Spur pipeline certificate
FERC Office of Public Participation	Helps the public take part (202-502-6595, OPP@ferc.gov)
Oregon Public Utility Commission	Oversaw Idaho Power's RFP under Oregon rules; UM 2434
U.S. Fish and Wildlife Service, Idaho Fish and Game, BLM, EPA	Got the FERC draft; Fish and Wildlife had no comments; BLM plans to cooperate on Silver Spur
Shoshone-Bannock Tribes, Shoshone-Paiute Tribes, Idaho State Historical Society	Got the FERC draft per the email header
Elmore County	Peregrine's conditional use permit and variances

Others

Name	Role
London Economics International	Independent evaluator for the RFP
Wärtsilä	Engine supplier for Bennett Mountain; same supplier per Idaho Power for South Hills
McDowell Rackner Gibson (Adam Lowney)	Filed Idaho Power's Oregon exception report
Chobani	Twin Falls load seeking up to 40 MW (IPC-E-26-19)
White Buffalo	Hansen-area project with a county tax exemption pushed to 2029, waiting on Idaho Power
Meta	Data center south of Boise, operating since September 2026, in Idaho Power's forecast
KMVT, KIVI	Local TV coverage, June 2026
NGI, Oil & Gas Watch	Trade and watchdog coverage of Silver Spur shippers

Glossary

AFUDC (allowance for funds used during construction). Interest a utility books on construction spending and later recovers from customers. Idaho Power wants it to start in December 2025 for South Hills. Staff wants it to start only when a certificate issues.

aMW (average megawatt). Energy averaged over time. 1 aMW is 8,760 megawatt-hours a year.

ADITC mechanism. A Commission-approved tool that lets Idaho Power use accumulated deferred investment tax credits to prop up its Idaho return in weak years. Idaho Power used $40.3 million of it in 2025.

Benchmark bid. A utility's own project entered into its own RFP. Milner started as one.

BESS. Battery energy storage system.

Capacity deficit. The gap between the most power customers need at peak and what the utility can count on. Idaho Power says it faces deficits starting 2028.

Capacity factor. How hard a plant runs, as a share of what it could produce running full time all year.

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Certificate of public convenience and necessity (CPCN). The PUC's finding that a new plant is needed. It's the approval South Hills is waiting on.

Cluster study. Idaho Power's newer way of studying many interconnection requests at once.

Conditional use permit (CUP). A county permit for a use allowed only with a hearing and conditions. Peregrine needed one. Every wind and solar project in Twin Falls County needs one.

Consent judgment. A court-approved settlement. The 2022 Milner hydro discharge case ended in one.

Dekatherm per day (Dth/d). A unit of gas pipeline capacity. Silver Spur would carry about 275,000 Dth/d.

Dispatchable. A plant that can be turned on when needed, as gas engines can and solar can't.

EPC contract. Engineering, procurement and construction contract with the builder.

Ex parte contact. A private contact with a decision-maker about a pending quasi-judicial matter. Idaho courts require disclosure.

Firm capacity. Pipeline or transmission space reserved so it's there on the coldest or hottest day.

Formaldehyde. A hazardous air pollutant gas engines emit. It drives the major-source question for South Hills.

Growth Pays for Growth. IDACORP's phrase for making new loads cover the cost of serving them.

Independent evaluator. An outside firm that scores RFP bids. London Economics International did here.

Integrated resource plan (IRP). Idaho Power's long-range plan for load and resources, filed every two years.

Interconnection queue. The line of projects asking to connect to the grid. South Hills is #798.

Large load. A single customer using many megawatts, such as a chip fab or data center. Idaho Power's label is AFL.

Lot line adjustment. A county approval moving a boundary between parcels. Z2026-0001 moved 19.877 acres to Idaho Power.

Material Modification Assessment. A utility study of whether a change to an interconnection request is big enough to lose its place in line.

Modified Procedure. PUC process using written comments instead of a hearing.

Nameplate capacity. The maximum rated output. South Hills is 222 MW.

NPDES / IPDES. The federal water discharge permit program, run in Idaho by DEQ as IPDES.

Open season. A pipeline's window for shippers to bid for new capacity.

Permit to construct. Idaho DEQ's air permit required before building a regulated source.

Permitted use. A use a zone allows without a hearing or neighbor notice.

Precedent agreement. A shipper's commitment to take pipeline capacity if the project is built.

Pre-filing. FERC's early review before a pipeline files its formal application.

Project boundary. The land inside a FERC hydro license. It can't be sold or released without FERC approval.

Prudence review. The PUC's later look at whether costs were reasonable before letting them into rates.

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PSD (Prevention of Significant Deterioration). Federal air review for major new sources, triggered at 250 tons a year for this kind of plant.

Quasi-judicial. A decision on a specific application, which must rest on the record.

Rate base. The investment a utility earns a return on.

Reciprocating engine. A piston engine, like a very large car engine. South Hills would have twelve.

Reconsideration. A petition asking the PUC to change a final order, due within 21 days.

Resource Report 1. The first section of a pipeline application, describing the project and its customers.

RFP (request for proposals). A competitive solicitation for new power resources.

Scoping. FERC's first public step in an environmental review.

SCR (selective catalytic reduction). NOx control using ammonia or urea.

Shortlist. The bids left after scoring, approved in this RFP by the Oregon PUC.

Soft cost cap / hard cost cap. A soft cap lets a utility seek more later with proof. A hard cap doesn't.

Special contract. A custom PUC-approved deal for one large customer, such as Micron or Chobani.

Synthetic minor. A source that takes enforceable limits to stay under major-source lines.

Tier I (Title V) permit. Idaho's federal operating permit for major sources.

Time-limited opportunity exception. Oregon's bidding rule exception for a resource of unique value. Idaho Power claimed it April 9, 2026.

63-602NN exemption. Idaho's property tax exemption, up to five years, for new plant investment.

Article 414. The Milner license requirement for 23.5 acres of riparian wetland habitat.

Part 12D. FERC's periodic independent safety review of a dam.

Acronyms

Acronym	Meaning
ADITC	Accumulated deferred investment tax credits
AFL	Idaho Power's label for its large-customer class
AFUDC	Allowance for funds used during construction
aMW	Average megawatt
BESS	Battery energy storage system
BLM	Bureau of Land Management
CO	Carbon monoxide
COD	Commercial operation date
CPCN	Certificate of public convenience and necessity
CUP	Conditional use permit
DAG	Deputy attorney general

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Acronym	Meaning
DEQ	Idaho Department of Environmental Quality
Dth/d	Dekatherms per day
EIS / EA	Environmental impact statement / environmental assessment
EPA	U.S. Environmental Protection Agency
EPC	Engineering, procurement and construction
FERC	Federal Energy Regulatory Commission
GI	Generator interconnection
GSU	Generator step-up transformer
HAP	Hazardous air pollutant
IDAPA	Idaho Administrative Procedure Act (state rules)
IDFG	Idaho Fish and Game
IDWR	Idaho Department of Water Resources
IIPA	Idaho Irrigation Pumpers Association
IPUC	Idaho Public Utilities Commission
IRP	Integrated resource plan
ITC	Investment tax credit
LLUPA	Local Land Use Planning Act (Idaho Code 67-65)
MMA	Material Modification Assessment
MW	Megawatt
NAAQS	National ambient air quality standards
NGA	Natural Gas Act
NOx	Nitrogen oxides
NPDES / IPDES	National / Idaho Pollutant Discharge Elimination System
NWEC	NW Energy Coalition
OPP	FERC Office of Public Participation
P&Z	Planning and Zoning
PSD	Prevention of Significant Deterioration
PTC	Permit to construct
RCC	Rockies Columbia Connector
RFP	Request for proposals
ROE	Return on equity
RR1	Resource Report 1
SCR	Selective catalytic reduction

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Acronym	Meaning
SWIP-N	Southwest Intertie Project-North
SWPPP	Stormwater pollution prevention plan
USFWS	U.S. Fish and Wildlife Service
VOC	Volatile organic compounds

Case, docket and permit numbers

Number	What it is
IPC-E-26-04	South Hills and Peregrine certificates and accounting order (pending)
IPC-E-26-07	Large-load cost of service case; hearing Jan. 19 to 21, 2027
IPC-E-26-09 / PAC-E-26-06	Gateway West Segment E-8 certificates; Final Order 37231, Nov. 18, 2026
IPC-E-26-19	Chobani energy services agreement, Schedule 35
IPC-E-26-26	Marginal cost pricing framework for large loads (Order 37234)
IPC-E-26-31 / PAC-E-26-15	Idaho Power and PacifiCorp transmission asset exchange
IPC-E-26-11	Brenda Charles' formal complaint against Idaho Power (Order 37057, June 2, 2026); unrelated to South Hills
Order 32745 (2013)	Oregon bidding rules apply to Idaho Power
Order 36898 (Jan. 2, 2026)	Idaho RFP rules and waiver process
Order 36958 (Mar. 10, 2026)	Bennett Mountain expansion
Orders 36993, 36994, 37026, 37048	South Hills intervention, notice of application and Modified Procedure orders
Order 37049 (May 22, 2026)	Rocky Mountain Power RFP waiver
Orders 36881, 36932	Earlier Idaho Power soft cost cap and clarification (IPC-E-25-10)
Oregon UM 2434	Idaho Power's time-limited opportunity report
Oregon Order 25-327	Oregon acknowledgment of the 2029 final shortlist
Oregon Orders 22-081 (UM 2210), 24-120 (UM 2317)	No good cause to waive all bidding rules for the 2022 RFP (Mar. 11, 2022); partial waiver for the RFP that produced the Milner bid (April 2024)
FERC P-2899	Milner Hydroelectric Project license
FERC P-2899-157	Boundary amendment, accession 20260908-5365
FERC PF26-15	Silver Spur pre-filing
91 FR 74153 (doc. 2026-23441)	Silver Spur scoping notice
GI #798	South Hills interconnection request, 222 MW, Milner 138 kV
GI #797, #796	Idaho Power origination requests, 19.26 MW each, Milner and Mayfield

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Number	What it is
Parcel RP10S21E296020	SJA Land Co field, source of the 19.877 acres
Parcel RP10S21E296010	Idaho Power river parcel, now holding the site acreage
Z2026-0001	Lot line adjustment at the site, final May 18, 2026
Z2026-0070	Agricultural Zone permitted-use amendments
Ordinance 282 (2024)	Wind and solar conditional use permits
Ordinance 294 (2026)	Agricultural Zone permitted uses, including public utility facilities
CV42-22-1195	Milner hydro consent judgment, 2022
CUP-2025-32	Peregrine conditional use permit, Elmore County
Idaho Code 61-335	HB 911, large-load ratepayer protections
Idaho Code 61-626	21-day reconsideration of PUC orders
Idaho Code 67-6512, 67-6521	Special use hearings; affected persons and judicial review
Idaho Code 63-602NN	Property tax exemption for new plant investment
IDAPA 58.01.01.201	Air permit to construct required
18 CFR 4.202	FERC license amendment notice

Case contacts

- IPUC public information: Adam Rush, 208-334-0339, adam.rush@puc.idaho.gov
- IPUC Staff attorney: Kelsea E. Ross, 208-334-0318
- Idaho Power: Donovan Walker (counsel), Tim Tatum, Connie Aschenbrenner; project contact Nate Murray
- IIPA: Eric L. Olsen, Echo Hawk and Olsen, Pocatello
- NWEC: Benjamin J. Otto, Lauren McCloy; Renewable Northwest: Aaron Menenberg (Idaho)
- Twin Falls County Planning and Zoning: 630 Addison Ave W, Suite 1100, 208-734-9490
- Twin Falls County Commissioners: commiss@tfco.org
- Twin Falls County Planning and Zoning records: pandz@tfco.org
- FERC Office of Public Participation: 202-502-6595, OPP@ferc.gov
- Idaho Power South Hills project manager Brady Lang: blang@idahopower.com
- Idaho DEQ air quality permitting, Boise

Related news and reading

Williams' Silver Spur Pipeline to Tap Ruby for Idaho Natural Gas Supply (Oct. 8, 2026) (NGI)

https://naturalgasintel.com/news/williams-silver-spur-pipeline-to-tap-ruby-for-idaho-natural-gas-supply/

In Idaho, company makes first move in massive Pacific Northwest gas pipeline expansion (Oct. 8, 2026) (Oil & Gas Watch)

https://news.oilandgaswatch.org/post/in-idaho-company-makes-first-move-in-massive-pacific-northwest-gas-pipeline-expansion

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Largest gas pipeline network in Northwest could grow as Oklahoma-based owners pursue expansion (Oct. 22, 2026) (Oregon Capital Chronicle)

https://oregoncapitalchronicle.com/2026/10/22/largest-gas-pipeline-network-in-northwest-could-grow-as-oklahoma-based-owners-pursue-expansion/

Q1 Earnings Recap: Data centers accelerate new growth paths for Williams (May 5, 2026) (Williams)

https://www.williams.com/2026/05/05/q1-earnings-recap-data-centers-accelerate-new-growth-paths-for-williams/

Idaho Power proposes new power plant in Twin Falls County (June 17, 2026) (KMVT)

https://www.kmvt.com/2026/06/17/idaho-power-proposes-new-power-plant-twin-falls-county/

Idaho Power proposes natural gas plant near Milner Dam to meet rising energy demand (June 2026) (KIVI)

https://www.kivitv.com/twin-falls/idaho-power-proposes-natural-gas-plant-near-milner-dam-to-meet-rising-energy-demand

Idaho Power wants to build two natural gas power plants. Here's where and why (May 2026) (Idaho Statesman via AOL)

https://www.aol.com/news/idaho-power-wants-build-two-100000628.html

Idaho Power Proposes More Gas Plants to Meet Capacity Needs (May 2026) (Clearing Up)

https://www.newsdata.com/clearing_up/clearing_it_up/idaho-power-proposes-more-gas-plants-to-meet-capacity-needs/article_66a84010-5424-4360-86ea-4a975f9a0bf2.html

Idaho Power Plans Two Natural Gas Plants to Keep Pace With Surging Demand (June 3, 2026) (Canyon County News)

https://canyoncountynews.com/idaho-power-plans-two-natural-gas-plants-to-keep-pace-with-surging-demand-across-the-state/

IDACORP Q3 Earnings Call Highlights (Oct. 30, 2026) (MarketBeat)

https://www.marketbeat.com/instant-alerts/transcript-idacorp-q3-earnings-call-highlights-2026-10-30/

IDACORP Beats and Raises Again as Large-Load Ramp Builds (Earnings Whispers)

https://www.earningswhispers.com/article/IDA/r964

Paris Generation Project, 7 gas engines, 128 MW, full EIS before approval (Docket 6630-CE-316) (Public Service Commission of Wisconsin)

https://psc.wi.gov/Pages/CommissionActions/CasePages/ParisGeneration.aspx

Paris RICE Generation Project (CPCN issued July 2, 2025) (We Energies)

https://www.we-energies.com/company/paris-generation-project

Peregrine Energy Center (Idaho Power)

https://idahopower.com/energy-environment/energy/energy-sources/natural-gas/peregrine-energy-center/

South Hills Power Plant (Idaho Power)

https://idahopower.com/energy-environment/energy/energy-sources/natural-gas/south-hills-gas-plant/

Draft permit to construct, Bennett Mountain Power Plant (comment period Apr. 29 to May 29, 2026) (Idaho DEQ)

https://www.deq.idaho.gov/deq-seeks-comment-on-draft-permit-to-construct-modification-for-idaho-power-company/

Where the files are

All under E:\2026 Milner Project:

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- Briefings: this briefing; Briefing rev 4 (unchanged); Addendum A (Twin Falls County records); Addendum 1 (another session's update, with four draft posts and two draft articles not carried into this briefing). Earlier revisions in BriefingsRevisions.
- Briefings and Updates: New Findings, Nov. 18, 2026 (lot line adjustment, interconnection reports, Gateway West order).
- Research_Claude_Accountability_2026-11-18: 21 findings dossiers and the accountability reports.
- Milner_2026_Accountability_Rev06 (folder and zip): the parallel 25-finding accountability repository; its executive summary (rev 6) is in Briefings.
- Findings: copies of every research packet, indexed.
- Twin Falls County Records: the county records search memo, 25 key county PDFs and the scan index.
- FERC P-2899 and FERC Silver Spur PF26-15: filing lists, the boundary amendment and the Federal Register notice.
- Gap Review 2026-11-18: PUC filings, Elmore County records, the earnings call transcript and Silver Spur articles.
- Research_Grok_2026-11-18 and the Milner Research Workbench: other sessions' catalogs, quotation and entity lists, and the integrity audit.
- Storyboards and Ideas: Milner gas power plant video storyboards, rev 2.

Source documents

- IPUC case IPC-E-26-04: https://puc.idaho.gov/Case/Details/7719
- Idaho Power application (Mar. 10, 2026): https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=156095
- Staff comments (July 31, 2026): https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=160080
- NWEC/RNW comments: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=160140
- IIPA comments: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=160129
- Idaho Power reply (Aug. 14, 2026): https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=160597
- Hackett direct testimony: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=156097
- Richins direct testimony: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=156177
- Notice of Modified Procedure, Order 37048: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=158417
- Public comment batch example (July 30): https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=160072
- PUC decision meeting minutes, Oct. 6, 2026: https://puc.idaho.gov/Fileroom/PublicFiles/Agenda/2026/20261006MIN.pdf
- Idaho Power South Hills page: https://idahopower.com/about-us/energy/energy-sources/natural-gas/south-hills-gas-plant/
- GI #797 feasibility study: https://docs.idahopower.com/pdfs/AboutUs/businessToBusiness/GIReports/RedactedFeSR797.pdf
- Interconnection queue #798: https://www.interconnection.fyi/project/idaho-power-798
- FERC Silver Spur project: https://www.ferc.gov/silver-spur-project
- KIVI, June 26, 2026: https://www.kivitv.com/twin-falls/idaho-power-proposes-natural-gas-plant-near-milner-dam-to-meet-rising-energy-demand
- KMVT, June 17, 2026: https://www.kmvt.com/2026/06/17/idaho-power-proposes-new-power-plant-twin-falls-county/
- Twin Falls Canal Co., Milner Dam history: https://twinfallscanal.com/?p=19

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- IPUC Order 36898 (Idaho RFP rules): https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/GNR/GNRE2501/OrdNotc/20260102Final_Order_No_36898.pdf
- IPUC Order 37049 (Rocky Mountain Power waiver): https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/PAC/PACE2520/OrdNotc/20260522Final_Order_No_37049.pdf
- Idaho Power report to Oregon PUC, UM 2434: https://edocs.puc.state.or.us/efdocs/HNA/um2434hna345386028.pdf
- Twin Falls County parcel service (Aug. 2025): https://services3.arcgis.com/2IFfYsoBD697ZuE3/arcgis/rest/services/TFCO_Parcels_08_2025/FeatureServer
- Idaho Secretary of State business search: https://sosbiz.idaho.gov/search/business
- Wärtsilä 18V50SG emissions and efficiency (NW Power Council presentation): https://www.nwcouncil.org/sites/default/files/Recips-John-Robbins.pdf
- EPA AP-42 Section 3.2 factors as applied by San Diego APCD (4-stroke lean burn with SCR): https://www.sdapcd.org/content/dam/sdapcd/documents/permits/emissions-calculation/combustion--gas-fuels/APCD-Engine-Natural-Gas-Fired-4-Stroke-Lean-Burn-with-SCR.pdf
- EPA permit V-25-010, Wärtsilä 18V50SG engines with 225-ton cap: https://www.epa.gov/system/files/documents/2025-06/permit-v-25-010-proposed-6-4-2025.pdf
- Idaho DEQ notice, Bennett Mountain draft permit (comment April 29 to May 29, 2026): https://www.deq.idaho.gov/?p=83760
- Idaho Power, Bennett Mountain expansion page: https://www.idahopower.com/energy-environment/energy/energy-sources/natural-gas/bennett-mountain-power-plant-proposed-expansion/
- FERC P-2899 boundary amendment application, Sept. 8, 2026 (eLibrary accession 20260908-5365, sub-docket P-2899-157). Copy in this folder, FERC P-2899.
- Federal Register, FERC Notice of Scoping, Silver Spur (PF26-15), Nov. 18, 2026, 91 FR 74153, doc. 2026-23441: https://www.federalregister.gov/d/2026-23441. PDF saved in this folder, FERC Silver Spur PF26-15.
- FERC eLibrary: https://elibrary.ferc.gov/eLibrary/search
- FERC eComment: https://ferconline.ferc.gov/QuickComment.aspx
- FERC eSubscription: https://ferconline.ferc.gov/eSubscription.aspx
- IPUC Order 36958 (Bennett Mountain). Copy in this folder, Related Orders and Filings.
- A Tenth of an Acre at Milner, Explainer rev 1. This folder.
- IDACORP and Idaho Power Form 10-Q for the quarter ended June 30, 2026 (filed July 30, 2026, accession 0001057877-26-000129), Note 8, Commitments.
- IPUC Notice of Application, Order 37101, IPC-E-26-19 (Chobani), July 21, 2026: https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/IPC/IPCE2619/OrdNotc/20260721Notice_of_Application_Order_No_37101.pdf
- 2026 Milner Research Phase 1 and Phase 2 packets (other sessions, Nov. 18). This folder. Leads only until checked.
- FERC eLibrary filing lists for P-2899 and PF26-15, Jan. 1 to Nov. 18, 2026, saved as spreadsheets in the two FERC folders.
- Jeff A. Pierson, Substack post answering Idaho Power on SWIP-N point by point, Nov. 13, 2025: https://jeffapierson.substack.com/p/idaho-power-swip-n-point-by-point
- IPUC Final Order No. 37231 (Gateway West E-8), Nov. 18, 2026: https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/IPC/IPCE2609/OrdNotc/20261118Final_Order_No_37231.pdf
- Idaho Power South Hills page (moved; read Nov. 19, 2026): https://idahopower.com/energy-environment/energy/energy-sources/natural-gas/south-hills-gas-plant/ and https://idahopower.com/about-us/energy/energy-sources/natural-gas/south-hills-gas-plant/

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- Consent Judgment, CV42-22-1195 (DEQ document 22163): https://www2.deq.idaho.gov/admin/LEIA/api/document/download/22163
- IDACORP Q3 2026 earnings call transcript (Benzinga, via Webull): https://www.webull.com/news/15833623493964800
- Coeur d'Alene Press, "Little leads in fundraising," Oct. 15, 2026: https://cdapress.com/news/2026/oct/15/idahoans-primary-donors-to-gubernatorial-candidates/
- Oregon PUC Order 22-081: https://apps.puc.state.or.us/orders/2022ords/22-081.pdf; Order 24-120: https://apps.puc.state.or.us/orders/2024ords/24-120.pdf
- IPUC Order 36958 (Bennett), Mar. 10, 2026: https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/IPC/IPCE2529/OrdNotc/20260310Final_Order_No_36958.pdf
- DOE/OSTI, "Getting two for one: Adding hydropower at the Milner Irrigation Dam": https://www.osti.gov/biblio/5498912
- IPUC case IPC-E-26-09 page: https://puc.idaho.gov/case/Details/7741
- IPUC case IPC-E-26-04 page, checked Nov. 18, 2026, 11 p.m.: no final order
- IPUC news release, Idaho Supreme Court affirms Commission on Washington climate costs, Nov. 21, 2025: https://puc.idaho.gov/Fileroom/PublicFiles/Press/20251121Supreme%20Court%201121%20Release.pdf.pdf
- IPUC Order 36932 (soft cap clarification, IPC-E-25-10), Feb. 6, 2026: https://puc.idaho.gov/Fileroom/PublicFiles/ELEC/IPC/IPCE2510/OrdNotc/20260206Final_Order_No_36932.pdf
- Twin Falls County Citizens Connect permit portal (Z2026-0001, Z2026-0011, Z2026-0016, B2026-0279): https://twinfalls-id.permittrax.com/citizen/Home/TFCOUNTY_L/TWIN%20FALLS%20COUNTY
- Twin Falls County Ordinance 294, in commission minutes Aug. 24 to 28, 2026 (Twin Falls County Records folder)
- Twin Falls County Ordinance 282, Title 8 Chapter 21: https://codelibrary.amlegal.com/codes/twinfallscountyid/latest/twinfallscounty_id/0-0-0-5265
- Twin Falls County 2026 All Hazard Mitigation Plan: https://twinfallscounty.org/wp-content/uploads/Twin-Falls-HMP_2026.pdf
- Idaho Power GI #797 system impact study (RedactedSISR797.pdf) and #798 Material Modification Assessment (RedactedMMA798.pdf), Idaho Power generator interconnection reports page
- IDACORP Q3 2026 earnings call, Oct. 29, 2026, third-party transcript (Gap Review folder)
- IDACORP Form 10-Q, quarter ended Sept. 30, 2026: https://www.sec.gov/Archives/edgar/data/1057877/000105787726000137/ida-20260930.htm
- Elmore County CUP-2025-32 staff reports, P&Z agendas and minutes, and commission minutes May 15, 2026 (Gap Review folder)
- Idaho Code 61-335 (HB 911): https://legislature.idaho.gov/statutesrules/idstat/Title61/T61CH3/SECT61-335
- Idaho Code 67-6521: https://legislature.idaho.gov/statutesrules/idstat/Title67/T67CH65/SECT67-6521
- Gardiner v. Boundary County Board of Commissioners, 148 Idaho 764 (2010)
- Idaho DEQ, final amended consent judgments against Idaho Power, July 1, 2022 (DEQ news page)
- East Idaho News, Nov. 18, 2025, whistleblower lawsuit against the IPUC: https://www.eastidahonews.com/?p=792381
- Milner Gas Power Plant (South Hills) Briefing Addendum 1, rev 1 (Briefings folder)
- Milner Area Power Projects Briefing rev 4, Addendum A (Briefings folder)

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- Milner New Findings, Nov. 18, 2026, rev 1 (Briefings and Updates folder)
- Grok research comparison and entity catalog, Nov. 18, 2026 (Research_Grok_2026-11-18)

Twin Falls County records and Idaho law

Twin Falls County records (copies in the Twin Falls County Records folder)

- Commission agenda, Wed. Feb. 11, 2026: https://twinfallscounty.org/wp-content/uploads/Wednesday-2.11.26.pdf
- Commission minutes, Feb. 9 to 13, 2026: https://twinfallscounty.org/wp-content/uploads/February-9-February-13.pdf
- Commission agenda, Mon. Mar. 23, 2026: https://twinfallscounty.org/wp-content/uploads/Monday-3.23.26.pdf
- Commission minutes, Mar. 23 to 27, 2026: https://twinfallscounty.org/wp-content/uploads/March-23-March-27.pdf
- Commission agenda, Mon. Apr. 20, 2026: https://twinfallscounty.org/wp-content/uploads/Monday-4.20.26.pdf
- Commission minutes, Apr. 20 to 24, 2026: https://twinfallscounty.org/wp-content/uploads/April-20-April-24.pdf
- Commission agenda, Mon. Apr. 27, 2026: https://twinfallscounty.org/wp-content/uploads/Monday-4.27.26.pdf
- Commission minutes, Apr. 27 to May 1, 2026: https://twinfallscounty.org/wp-content/uploads/April-27-May-1-1.pdf
- P&Z hearing agenda, Apr. 7 and 9, 2026: https://twinfallscounty.org/wp-content/uploads/April9_publichearing.pdf
- P&Z amended agenda, June 9 and 11, 2026: https://twinfallscounty.org/wp-content/uploads/AmendedAgenda_June.pdf
- P&Z work session notice, June 23, 2026: https://twinfallscounty.org/wp-content/uploads/June23-WorkSession.pdf
- Commission minutes, Aug. 24 to 28, 2026 (Ordinance 294): https://twinfallscounty.org/wp-content/uploads/August-24-28.pdf
- Commission minutes, Sept. 8 to 11, 2026 (White Buffalo): https://twinfallscounty.org/wp-content/uploads/September-8-11.pdf
- Commission minutes, Oct. 12 to 16, 2026: https://twinfallscounty.org/wp-content/uploads/October-12-16.pdf
- REDs meeting agenda, Aug. 26, 2025: https://twinfallscounty.org/wp-content/uploads/REDs-Meeting-Notice-Agenda-8.26.25-1.pdf
- Commission minutes, Feb. 3 to 7, 2025 (battery storage work session): https://twinfallscounty.org/wp-content/uploads/Feb-3-Feb-7-1.pdf
- Commercial building permit application, Oct. 2026: https://twinfallscounty.org/wp-content/uploads/Commercial-Building-Permit-Appl-2026-10.pdf
- 2026 All Hazard Mitigation Plan: https://twinfallscounty.org/wp-content/uploads/Twin-Falls-HMP_2026.pdf
- County code definitions (utility): https://codelibrary.amlegal.com/codes/twinfallscountyid/latest/twinfallscounty_id/0-0-0-1522
- Ordinance 282, wind and solar (Title 8, Chapter 21): https://codelibrary.amlegal.com/codes/twinfallscountyid/latest/twinfallscounty_id/0-0-0-5265
- Community Development Services page: https://twinfallscounty.org/community-development-services/

Idaho law

- Idaho Code 67-6512, special use permits: https://legislature.idaho.gov/statutesrules/idstat/Title67/T67CH65/SECT67-6512/

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- Idaho Code 67-6521, actions by affected persons: https://legislature.idaho.gov/statutesrules/idstat/Title67/T67CH65/SECT67-6521
- Idaho Code 67-6535, written decisions and reconsideration: https://legislature.idaho.gov/statutesrules/idstat/Title67/T67CH65/SECT67-6535
- Idaho Code 74-205, meeting minutes: https://legislature.idaho.gov/statutesrules/idstat/Title74/T74CH2/SECT74-205
- Idaho Code 63-602NN, business property exemption (Idaho Commerce user guide): https://commerce.idaho.gov/content/uploads/2016/06/User-Guide-Prop-Tax-Exemption.pdf
- *Gardiner v. Boundary County Bd. of Comm'rs*, 148 Idaho 764, 229 P.3d 369 (2010): https://case-law.vlex.com/vid/gardiner-v-boundary-county-895709448
- *Crookham v. County of Canyon* (Idaho, Jan. 2026), summarized by the Idaho Association of Counties: https://idcounties.org/llupas-affected-person-standard-may-lower-bar-for-idaho-land-use-challenges/
- *Eacret v. Bonner County*, 139 Idaho 780 (2004): https://hallapproved.com/id/cases/supreme/2004/2600131
- *Idaho Historic Preservation Council v. City Council*, 134 Idaho 651 (2000): https://hallapproved.com/id/cases/supreme/2000/2569166
- Idaho Association of Counties, Decision Making and Hearings for Idaho County Officials (Jan. 2026): https://idcounties.org/wp-content/uploads/2026/01/Decision-Making-Hearings-for-Idaho-County-Officials.pdf
- Idaho Association of Counties, Property Tax Exemptions Workshop (2023): https://idcounties.org/wp-content/uploads/2023/01/Property-Tax-Exemptions-Workshop.pdf

Other

- U.S. Forest Service, Cassia Division ("South Hills"): https://fs.usda.gov/r04/sawtooth/recreation/cassia-division
- Hackett Direct Testimony, IPC-E-26-04, p. 27: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=156097
- Twin Falls County Records search memo, rev 1, and scan index (this folder)

Revision block

- rev 3, Nov. 19, 2026: second review against primary records. Read Staff Comments, the HB 911 text, Order 37231, the Milner consent judgment, Idaho Power's moved South Hills page, its Bennett page, the Q3 call transcript, Oregon Orders 22-081 and 24-120, and Sunshine reporting on Gov. Little's donors. Corrected: the CFO's capex remark (it was about the 2031 and 2032 plants); air permit wording (exact quotes, Bennett contrast, "in the process of obtaining"); consent judgment details; Order 37231 terms; HB 911's 60-month test; Oregon waiver history; IPC-E-26-11 (unrelated complaint); Milner Dam, Inc. ownership; GI #798 status. Dropped the unverified Feb. 29, 2024 RFP date. Added Brady Lang as project manager.
- rev 2, Nov. 18, 2026: merged the parallel Accountability Rev06 executive summary that posted to Briefings during the build (Staff's least-cost finding, Oregon waiver history, Bennett contrast, HB 911's 50 MW threshold and Fab 2, Idaho Power's campaign giving, closed deliberation, advocate budgets). Added Gov. Little to the who's who and Oregon Orders 22-081 and 24-120 to the case index. Addendum 1 rev 2 checked; its two fixes were already reflected here.
- rev 1, Nov. 18, 2026: first version of the expanded briefing. Builds on Milner Area Power Projects Briefing rev 4, which stays unchanged in the Briefings folder. Adds Addendum A (Twin Falls County records, legal and ethical analysis), Addendum 1 from another session (Silver Spur shippers, Peregrine county comparison, investor statements, new PUC filings, cautions), the Nov. 18 New Findings notes (lot line adjustment Z2026-0001, interconnection reports, Gateway West Order 37231), the accountability findings with two diagrams, and corrections from the Grok comparison (disputed capex remark, unverified RFP start date, road

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name). New sections: quick answers rewritten, merged timeline, state and federal legal questions, PUC-level ethics, how the public can still weigh in, who's who, glossary, acronyms, and a case and permit number index. Addendum 1's draft posts and articles aren't carried over. Checked Nov. 18, 11 p.m.: IPC-E-26-04 still has no final order; Order 37231 is on the IPC-E-26-09 case page.

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