IPC-E-15-01

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Dear commissioners and staff,

I give you much credit for staying focused while reading the 168 page filing and other testimony.

I would like to say even though a PPA is signed it doesn't mean a generation source will ever come online. It does ensure Idaho Power will receive money if time tables and other requirements of the contract are not met. The PPA is the starting point to get funds and develop a project. Idaho Power's fears may or may not be realized.

I believe a 20 year PURPA contract is needed to allow these projects to be funded. It also allows Idaho Power's customers to lock in low cost energy for 20 years without having to worry about cost increases. The savings in fuel cost to the customer because of less gas and coal will be burned is important and I could not find numbers in the filing regarding fuel savings. Allphin's testimony (page 64) shows as recently as 2010 gas was $142.47 MWh. The IRP gas forecast projects rising gas prices. If the solar projects are built there will no longer be a need to build the Boardman to Hemingway transmission line saving customers money. The current solar PPAs are less than the cost of B2H. The Gateway West transmission line will also be not needed saving customers more money. As the IRP states the growth in power use will be during hot summer afternoons when solar shines and no need for curtailment at night because the sun doesn't shine at night.

It seems Idaho Power's strategy is to maximize corporate profits. They want to upgrade a coal plant, knowing in the future it will be shut down. They also want to build 2 transmission lines to 2 coal plants that they know will be shut down. They can receive a rate of return on the coal plant upgrades, the transmission lines, and then the decommissioning of the coal plant. All at the customers' expense and for the corporate profit.

The whole IRP process is flawed. As early as 2006 Idaho Power was aware of the coming cost reductions in solar PV. I pointed it out to them. It would have been wise for them to have built solar PV instead of the Langley Gulch gas plant. Langley Gulch was not needed when it was built. The solar could have been built as needed. The main reason Langley Gulch was approved was the reasoning it would be needed in integrate coming renewable generation. Now that generation is getting closer and Idaho Power wants to make sure it doesn't happen. Idaho Power actually had a solar farm in a past IRP but did not ever ask for bids because they said it would look bad if they built their own solar during a time they were saying negative things about solar.

Regarding the IRP process. It is good that Idaho Power does a natural gas forecast. They also need to do a solar PV forecast and a battery storage forecast. I believe the current load forecast is too low and this is possibly be design to help justify this filing. Technology is moving very rapidly and Idaho Power is not keeping up. They continue to do things the way they always have and it doesn't work now and won't work in the future.

As stated several times in the filing is the importance of diversity. There comes the problem for the reliability of the system. The filing shows generation coming from coal is 35% and 49% is hydro (page 12). This is not at all diverse in the right ways. Testimony from Grow states how they are

investing to make generation less diverse by cloud seeding and turbine upgrades. I imagine this additional hydro is being paid for by the customers. She talks about the must run hydro and coal. That must run hydro and coal is the problem (84% of generation comes from these 2 very inflexible generation sources). The hydro contributes to the late spring and early summer negative wholesale prices. Not long ago Idaho Power was still wanting to increase hydro production with the Shoshone Falls upgrade that would have hurt customers with the cost of the upgrades as well has paying someone to buy the surplus power. Obviously the problem is lack of flexible and peak power generation if 84% of generation comes from 2 inflexible sources. Solar will add diversity, reliability, and peak power generation to the mix. One additional issue with the current fuel mix is it has a very large water footprint (hydro and thermal). Beside wind, solar has the lowest water footprint of generation resources, which I am betting will be very important in the future.

Thank you for your consideration.

Josh Weber