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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF)	CASE NO. AVU-E-21-04
AVISTA CORPORATION'S)	
2021 INTEGRATED RESOURCE)	COMMENTS OF THE
PLAN)	IDAHO CONSERVATION
)	LEAGUE

The Idaho Conservation League (ICL) submits the following comments on Avista’s 2021 Integrated Resource Plan. ICL acknowledges the Commission acknowledgment focuses on the “ongoing planning process, not the conclusions or results reached throughout that process.” *Order No 34814*. Therefore, our comments focus on two process issues that arise in this 2021 resource plan.

Unexamined risks to Idahoans from Avista plan to pursue new fossil-gas generation

Avista’s Preferred Resource Strategy includes pursuing fixed-price, long-term hydropower contracts for Washington customers and utility-owned, fossil-gas power plants for Idaho. *See Avista 2021 Electric IRP Update at Page 3*. These resources have different ongoing cost and risk profiles for customers who enjoy fixed-price hydro in Washington compared to Idahoans who are subject to volatile gas prices and inevitable fossil-fuel pollution limitations. But the IRP risk analysis section only shows a single risk metric for this Preferred Resource Strategy. ICL recommends the Commission direct Avista to assess the different risk implications that arise from pursuing different resources for Idaho customers compared to Washington customers.

Colstrip is not economic now, but Avista plans to remain

“Avista’s most economic decision based on modeling in this IRP would be exiting both Units 3 and 4 as soon as possible.” *IRP at 11-5*. Despite the Preferred Resource Strategy, and in fact all scenarios that allowed for economic modeling, showing that an immediate exit of Colstrip is the

least cost option for Idahoans, Avista plans to remain in the plant due to the need for “a joint decision between all owners. This decision to prioritize Avista’s corporate relationship over customer needs results in the potential for \$12 to \$24 million in excess costs for Idahoans. *See IRP at 12-25 – 12- 27.* This is particularly troubling when Avista’s IRP Update states the “Company’s current resource mix has extra capacity” and that exiting Colstrip by 2023 would have a “de minimus resource deficit” of just 5 MW. *See IRP Update pages 9-10.* ICL recommends the Commission direct Avista to improve the IRP process by incorporating methods to protect Idaho customers where a resource is no longer economic instead of accepting a process where the utility prioritizes corporate relationships with other Colstrip owners. As the Commission knows from the Boardman and Valmy coal plants, there are viable methods for owners to exit plants at different times than other owners.

Respectfully submitted this 11th day of August 2021

/Benjamin J Otto
Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of August, 2021, I served the foregoing COMMENTS OF THE IDAHO CONSERVATION LEAGUE, to the following:

/s/ Benjamin J Otto
Benjamin J. Otto
Idaho Conservation League

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