



**STATE OF IDAHO**  
OFFICE OF THE ATTORNEY GENERAL  
LAWRENCE G. WASDEN

March 11, 2021

**VIA E-MAIL**

**Idaho Power Company**

Donovan E. Walker  
[DWalker@idahopower.com](mailto:DWalker@idahopower.com)  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707-007

Michael Darrington  
[MDarrington@idahopower.com](mailto:MDarrington@idahopower.com)  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707-0070

**PUBLISHED AVOIDED COST RATES FOR ENERGY STORAGE QUALIFYING FACILITIES; ORDER NO. 34913 IN CASE NO. IPC-E-20-02.**

In compliance with Order No. 34913 in Case No. IPC-E-20-02, Staff calculated published avoided cost rates for new Energy Storage Qualifying Facilities (QFs) using the Company's Peak Hours. Staff started with the published avoided costs in the Surrogate Avoided Resource (SAR) model approved in Order No. 34683 effective June 1, 2020. Next, Staff separated the avoided cost of energy and the avoided cost of capacity. Seasonalization Adjustments and Heavy Load/Light Load Adjustments are maintained for avoided cost of energy. Then, Staff spread the avoided cost of capacity over Peak Hours as contained in the Company's Compliance Filing per Commission Order No. 34913. Staff also calculated the levelized avoided cost of energy and the levelized avoided cost of capacity separately. Consequently, four additional tabs were created in the SAR model:

**Contracts & Administrative Law Division/Idaho Public Utilities Commission**  
P.O. Box 83720, Boise, Idaho 83720-0074 Telephone: (208) 334-0300, Fax: (208) 334-3762  
11331 W. Chinden Blvd., Bldg. 8, Suite 201-A, Boise, Idaho 83714

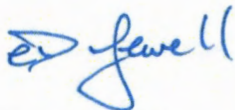
1. IPCOStorage(Energy)Non-LevelADJ: This tab calculates the non-levelized avoided cost of energy after Seasonalization Adjustments and Heavy Load/Light Load Adjustments for Energy Storage QFs.
2. IPCOStorage(Capacity): This tab calculates the non-levelized and levelized avoided cost of capacity rates for Energy Storage QFs.
3. IPCOStorage(Energy)Levelized: This tab calculates the levelized avoided cost of energy for Energy Storage QFs before Seasonalization Adjustments and Heavy Load/Light Load Adjustments, which will be used in the last tab.
4. IPCOStorage(Energy)LevelizedADJ: This tab calculates the levelized avoided cost of energy after Seasonalization Adjustments and Heavy Load/Light Load Adjustments for Energy Storage QFs.

Included is an updated copy of the SAR model. Attachment A is a detailed protocol that documents how Staff modified the model. Attachment B is the final published avoided cost rates for Energy Storage QFs. Attachment C is an analysis that illustrates the difference in rates between IRP Method rates and rates produced by the attached SAR model using the example supplied in the Company's Compliance Filing. Please review these attachments and file a response with the Commission by March 25, 2021, stating whether the updates to the SAR model and the calculations were made correctly.

Staff will update Peak Hours annually when the Company files its annual update to load forecasts, natural gas forecasts, and contract information for IRP Method rates as required by Commission Order No. 34913.

Thank you for your cooperation. Please contact Yao Yin ([yao.yin@puc.idaho.gov](mailto:yao.yin@puc.idaho.gov)) if you have any questions.

Sincerely,



Edward Jewell  
Deputy Attorney General

Enclosures

I:\Legal\ELECTRIC\ZZZ\_CLOSED ELECTRIC\2020\Idaho Power\IPC-E-20-02\Published Avoided Cost Rates\IPC\_Ltr\_3.11.2021.docx

## **Protocol for Updating SAR Model in Compliance with Order No. 34913**

### **Current Structure Description**

On "AVOID NEW" tab, Column AD contains avoided cost of energy. Column AG contains avoided cost of capacity after peak capacity factor adjustment, while Column T contains avoided cost of capacity before peak capacity factor adjustment. Column AH is the sum of Column AD and Column AG, which then will be seasonalized and adjusted by heavy load/light load hours.

### **Modification Overview**

Separate avoided cost of energy and avoided cost of capacity, spread avoided cost of capacity over peak hours, and adjust avoided cost of energy for seasonalization and heavy load and light load hours.

### **Detailed Steps**

#### *Development of Non-Levelized Rates for Avoided Capacity and Energy*

##### **Avoided Cost of Energy:**

Reference the values in Column AD on the AVOID NEW tab into Column C on the IPCOStorage(Energy)Non-LevelADJ tab. All technology categories have the same avoided cost of energy.

##### **Avoided Cost of Capacity:**

1. Annual value of CCCT in Column D on the IPCOStorage(Capacity) tab is equal to Column T on the AVOID NEW tab multiplied by 365, by 24 and then by the chosen technology's annual capacity factor. All technology categories have the same annual value of CCCT.
2. Subsequently, values in Column D on the IPCOStorage(Capacity) tab are spread over the total number of Peak Hours in a year.

#### *Development of Levelized Rates for Avoided Capacity and Energy*

##### **Avoided Cost of Energy:**

1. An intermediate tab of IPCOStorage(Energy)Levelized is created to contain levelized rates before seasonalization and heavy load and light load adjustments.
2. IPCOStorage(Energy)levelizedADJ tab shows the seasonalization and heavy load and light load adjustments.

##### **Avoided Cost of Capacity:**

1. The levelized avoided costs of capacity included in Column G on the IPCOStorage(Capacity) tab are the result of dividing the \$/MW in Column F by the number of peak hours in the year included in Cell L8.

Attachment A

2. The contract period for levelized avoided costs of capacity starts after the first deficit year. The formula in Column A on the IPCOStorage(Capacity) tab reference the "Input - Load and Resource" tab, where the capacity deficiency data is contained.

AVOIDED COST OF CAPACITY FOR ENERGY STORAGE (IPCO)			
Years of Levelized Avoided Cost of Capacity Payment	Online Year	Non-levelized Avoided Cost of Capacity during Peak Hours (\$/MWh)	Levelized Avoided Cost of Capacity during Peak Hours (\$/MWh)
0	2021		
0	2022		
0	2023		
0	2024		
0	2025		
1	2026	427.79	427.79
2	2027	434.07	430.81
3	2028	440.44	433.77
4	2029	446.91	436.68
5	2030	453.47	439.53
6	2031	460.13	442.33
7	2032	466.89	445.06
8	2033	473.75	447.74
9	2034	480.71	450.36
10	2035	487.78	452.92
11	2036	494.95	455.42
12	2037	502.23	457.86
13	2038	509.62	460.24
14	2039	517.12	462.56
15	2040	524.73	464.82
16	2041	532.46	467.02
17	2042	540.30	469.15
18	2043	548.26	471.23
19	2044	556.34	473.24
20	2045	564.54	475.20
21	2046	572.86	477.10

**IDAHO POWER**  
**AVOIDED COST RATES OF ENERGY FOR ENERGY STORAGE PROJECTS**  
 Eligibility for these rates is limited to energy storage projects 100 kW or smaller

Seasonization Factors		
Season 1	73.80%	(Applied to March - May)
Season 2	120.80%	(Applied to July, August, November, and December)
Season 3	180.80%	(Applied to January, February, June, September, and October)

IDAHO POWER NON-LEVELIZED RATES												
Year	Non-Levelized Price			Season 1 Pricing (73.5%)			Season 2 Pricing (120%)			Season 3 Pricing (180%)		
	Heavy and Light Load Hour Differential	Hour	Differential	Flat	Heavy Load Hour	Light Load Hour	Flat	Heavy Load Hour	Light Load Hour	Flat	Heavy Load Hour	Light Load Hour
				Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment	Price less wind integration adjustment
2021	23.83	27.07	19.79	17.52	NA	19.90	14.55	NA	23.83	NA	27.07	19.79
2022	23.90	27.14	19.86	17.57	NA	19.95	14.60	NA	23.90	NA	27.14	19.86
2023	24.93	28.17	20.89	18.32	NA	20.70	15.35	NA	24.93	NA	28.17	20.89
2024	27.03	30.27	22.89	19.87	NA	22.25	16.90	NA	27.03	NA	30.27	22.89
2025	30.30	33.54	26.26	22.27	NA	24.65	19.30	NA	30.30	NA	33.54	26.26
2026	33.51	36.75	29.47	24.63	NA	27.01	21.66	NA	33.51	NA	36.75	29.47
2027	35.80	39.14	31.86	26.38	NA	28.76	23.41	NA	35.80	NA	39.14	31.86
2028	37.85	40.89	33.61	27.87	NA	30.05	24.70	NA	37.85	NA	40.89	33.61
2029	38.64	41.88	34.60	28.40	NA	30.78	25.43	NA	38.64	NA	41.88	34.60
2030	38.98	42.22	34.84	28.65	NA	31.03	25.68	NA	38.98	NA	42.22	34.84
2031	39.56	42.80	35.62	29.15	NA	31.53	26.18	NA	39.56	NA	42.80	35.62
2032	40.95	44.19	36.91	30.10	NA	32.48	27.13	NA	40.95	NA	44.19	36.91
2033	42.57	45.81	38.53	31.29	NA	33.67	28.32	NA	42.57	NA	45.81	38.53
2034	44.07	47.31	40.03	32.39	NA	34.78	29.42	NA	44.07	NA	47.31	40.03
2035	45.32	48.56	41.28	33.31	NA	35.69	30.34	NA	45.32	NA	48.56	41.28
2036	46.63	49.87	42.59	34.27	NA	36.65	31.30	NA	46.63	NA	49.87	42.59
2037	48.78	52.02	44.74	35.65	NA	38.23	32.86	NA	48.78	NA	52.02	44.74
2038	50.50	53.74	46.48	37.12	NA	39.50	34.15	NA	50.50	NA	53.74	46.48
2039	51.80	55.04	47.78	38.07	NA	40.45	35.10	NA	51.80	NA	55.04	47.78
2040	53.13	56.37	49.09	39.05	NA	41.43	36.08	NA	53.13	NA	56.37	49.09
2041	54.49	57.64	50.36	39.98	NA	42.37	37.02	NA	54.49	NA	57.64	50.36
2042	55.88	59.10	51.82	41.08	NA	43.44	38.09	NA	55.88	NA	59.10	51.82
2043	57.56	60.80	53.52	42.31	NA	44.69	39.34	NA	57.56	NA	60.80	53.52
2044	59.63	62.87	55.56	43.83	NA	46.21	40.86	NA	59.63	NA	62.87	55.56
2045	61.27	64.51	57.23	45.03	NA	47.41	42.06	NA	61.27	NA	64.51	57.23
2046	63.68	66.92	59.64	46.80	NA	49.19	43.83	NA	63.68	NA	66.92	59.64

**IDAHO POWER**  
**AVOIDED COST RATES OF ENERGY FOR ENERGY STORAGE PROJECTS**  
 Eligibility for these rates is limited to energy storage projects 100 kW or smaller.

Seasonization Factors		
Season 1	74.00%	(Applied to March - May)
Season 2	128.00%	(Applied to July, August, November, and December)
Season 3	100.00%	(Applied to January, February, June, September, and October)

IDAHO POWER LEVELIZED RATES PROJECT ON-LINE IN 2021																					
Contract Length	Levelized Price			Season 1 Pricing (73.0%)						Season 2 Pricing (128%)						Season 3 Pricing (100%)					
	Heavy and Light Load Hour Differentials			Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	77.28			Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment	
	63.24 (94.04)			Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment
1	23.83	27.07	19.79	17.52	NA	19.80	NA	14.85	NA	28.80	NA	32.49	NA	23.75	NA	23.83	NA	27.07	NA	19.79	NA
2	23.87	27.11	19.83	17.54	NA	19.82	NA	14.87	NA	28.84	NA	32.53	NA	23.79	NA	23.87	NA	27.11	NA	19.83	NA
3	24.19	27.43	20.15	17.78	NA	20.18	NA	14.81	NA	29.03	NA	32.92	NA	24.18	NA	24.19	NA	27.43	NA	20.15	NA
4	24.82	28.06	20.78	18.24	NA	20.82	NA	18.27	NA	29.78	NA	33.87	NA	24.84	NA	24.82	NA	28.06	NA	20.78	NA
5	26.76	28.89	21.71	18.93	NA	21.31	NA	16.96	NA	30.80	NA	34.79	NA	26.05	NA	26.76	NA	28.89	NA	21.71	NA
6	28.80	30.04	22.76	19.70	NA	22.08	NA	16.73	NA	32.16	NA	36.05	NA	27.32	NA	28.80	NA	30.04	NA	22.76	NA
7	27.82	31.08	23.78	20.46	NA	22.83	NA	17.48	NA	33.38	NA	37.27	NA	28.83	NA	27.82	NA	31.08	NA	23.78	NA
8	28.74	31.87	24.69	21.12	NA	23.50	NA	18.19	NA	34.48	NA	38.37	NA	29.63	NA	28.74	NA	31.87	NA	24.69	NA
9	29.82	32.79	25.48	21.70	NA	24.06	NA	18.73	NA	35.43	NA	39.31	NA	30.56	NA	29.82	NA	32.79	NA	25.48	NA
10	30.17	33.41	26.13	22.18	NA	24.58	NA	18.21	NA	36.20	NA	40.09	NA	31.26	NA	30.17	NA	33.41	NA	26.13	NA
11	30.73	33.87	26.80	22.69	NA	24.97	NA	18.82	NA	36.88	NA	40.77	NA	32.03	NA	30.73	NA	33.87	NA	26.80	NA
12	31.27	34.61	27.23	22.88	NA	26.36	NA	20.02	NA	37.82	NA	41.41	NA	32.87	NA	31.27	NA	34.61	NA	27.23	NA
13	31.79	35.03	27.75	23.38	NA	25.74	NA	20.39	NA	38.14	NA	42.03	NA	33.30	NA	31.79	NA	35.03	NA	27.75	NA
14	32.29	35.63	28.25	23.73	NA	26.11	NA	20.78	NA	38.75	NA	42.63	NA	33.80	NA	32.29	NA	35.63	NA	28.25	NA
15	32.76	36.00	28.72	24.09	NA	26.48	NA	21.11	NA	39.21	NA	43.20	NA	34.47	NA	32.76	NA	36.00	NA	28.72	NA
16	33.21	36.45	29.17	24.41	NA	26.79	NA	21.44	NA	39.85	NA	43.74	NA	35.01	NA	33.21	NA	36.45	NA	29.17	NA
17	33.87	36.91	29.83	24.74	NA	27.13	NA	21.77	NA	40.40	NA	44.29	NA	35.55	NA	33.87	NA	36.91	NA	29.83	NA
18	34.11	37.36	30.07	25.07	NA	27.45	NA	22.10	NA	40.83	NA	44.82	NA	36.08	NA	34.11	NA	37.36	NA	30.07	NA
19	34.83	37.77	30.48	25.38	NA	27.76	NA	22.41	NA	41.43	NA	45.33	NA	36.58	NA	34.83	NA	37.77	NA	30.48	NA
20	34.82	38.16	30.88	25.67	NA	28.05	NA	22.70	NA	41.81	NA	45.80	NA	37.06	NA	34.82	NA	38.16	NA	30.88	NA

IDAHO POWER LEVELIZED RATES PROJECT ON-LINE IN 2022																					
Contract Length	Levelized Price			Season 1 Pricing (73.0%)						Season 2 Pricing (128%)						Season 3 Pricing (100%)					
	Heavy and Light Load Hour Differentials			Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	77.28			Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment		Price less used integration adjustment	
	63.24 (94.04)			Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment	Price	Integration adjustment
1	23.80	27.14	19.86	17.57	NA	19.85	NA	14.80	NA	28.68	NA	32.57	NA	23.83	NA	23.80	NA	27.14	NA	19.86	NA
2	24.40	27.83	20.36	17.93	NA	20.31	NA	14.98	NA	29.27	NA	33.16	NA	24.43	NA	24.40	NA	27.83	NA	20.36	NA
3	25.21	28.44	21.18	18.63	NA	20.91	NA	15.69	NA	30.25	NA	34.13	NA	25.40	NA	25.21	NA	28.44	NA	21.18	NA
4	26.33	29.67	22.19	19.35	NA	21.74	NA	16.38	NA	31.80	NA	36.49	NA	26.75	NA	26.33	NA	29.67	NA	22.19	NA
5	27.85	30.79	23.51	20.25	NA	22.83	NA	17.28	NA	33.06	NA	36.95	NA	28.21	NA	27.85	NA	30.79	NA	23.51	NA
6	28.88	31.82	24.84	21.06	NA	23.48	NA	18.11	NA	34.42	NA	38.31	NA	29.87	NA	28.88	NA	31.82	NA	24.84	NA
7	29.69	32.82	25.54	21.82	NA	24.20	NA	18.85	NA	35.82	NA	39.81	NA	30.77	NA	29.69	NA	32.82	NA	25.54	NA
8	30.52	33.78	26.48	22.43	NA	24.81	NA	19.48	NA	36.62	NA	40.51	NA	31.78	NA	30.52	NA	33.78	NA	26.48	NA
9	31.19	34.43	27.16	22.83	NA	25.31	NA	19.98	NA	37.43	NA	41.32	NA	32.58	NA	31.19	NA	34.43	NA	27.16	NA
10	31.77	35.01	27.73	23.36	NA	26.73	NA	20.36	NA	38.13	NA	42.01	NA	33.28	NA	31.77	NA	35.01	NA	27.73	NA

11	32.32	35.56	28.28	23.75	NA	26.13	NA	20.78	NA	38.78	NA	42.87	NA	33.93	NA	32.32	NA	35.56	NA	28.28	NA
12	32.85	36.09	28.81	24.16	NA	26.53	NA	21.18	NA	39.42	NA	43.51	NA	34.57	NA	32.85	NA	36.09	NA	28.81	NA
13	33.37	36.81	29.33	24.53	NA	26.91	NA	21.59	NA	40.04	NA	44.03	NA	35.19	NA	33.37	NA	36.81	NA	29.33	NA
14	33.88	37.10	29.82	24.88	NA	27.27	NA	21.91	NA	40.63	NA	44.51	NA	35.78	NA	33.88	NA	37.10	NA	29.82	NA
15	34.32	37.56	30.28	25.23	NA	27.61	NA	22.26	NA	41.18	NA	45.07	NA	36.34	NA	34.32	NA	37.56	NA	30.28	NA
16	34.78	38.03	30.75	25.57	NA	27.95	NA	22.60	NA	41.75	NA	45.63	NA	36.90	NA	34.78	NA	38.03	NA	30.75	NA
17	35.25	38.49	31.21	25.91	NA	28.29	NA	22.94	NA	42.30	NA	46.18	NA	37.45	NA	35.25	NA	38.49	NA	31.21	NA
18	35.68	38.92	31.64	26.23	NA	28.61	NA	23.28	NA	42.82	NA	46.71	NA	37.97	NA	35.68	NA	38.92	NA	31.64	NA
19	36.09	39.33	32.05	26.53	NA	28.91	NA	23.56	NA	43.31	NA	47.20	NA	38.47	NA	36.09	NA	39.33	NA	32.05	NA
20	36.49	39.73	32.45	26.82	NA	29.20	NA	23.85	NA	43.78	NA	47.67	NA	38.94	NA	36.49	NA	39.73	NA	32.45	NA

IDAHO POWER  
LEVELIZED RATES  
PROJECT ON-LINE IN 2023

Contract Length	Levelized Price			Season 1 Pricing (73.5%)						Season 2 Pricing (129%)						Season 3 Pricing (109%)					
	Hour and Light Load			Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	Hour Differential	Hour	Light Load Hour	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment
1	24.83	28.17	20.89	18.32	NA	20.70	NA	15.35	NA	29.92	NA	33.80	NA	25.07	NA	24.93	NA	28.17	NA	20.89	NA
2	25.94	29.16	21.90	19.06	NA	21.45	NA	16.10	NA	31.13	NA	35.01	NA	26.28	NA	25.94	NA	29.16	NA	21.90	NA
3	27.28	30.52	23.24	20.06	NA	22.43	NA	17.08	NA	32.73	NA	36.52	NA	27.69	NA	27.28	NA	30.52	NA	23.24	NA
4	28.86	31.90	24.62	21.06	NA	23.44	NA	18.09	NA	34.39	NA	38.28	NA	29.54	NA	28.86	NA	31.90	NA	24.62	NA
5	29.89	33.13	25.85	21.97	NA	24.35	NA	18.90	NA	35.86	NA	39.75	NA	31.02	NA	29.89	NA	33.13	NA	25.85	NA
6	30.84	34.18	26.90	22.74	NA	25.12	NA	19.77	NA	37.13	NA	41.02	NA	32.28	NA	30.84	NA	34.18	NA	26.90	NA
7	31.80	35.04	27.76	23.37	NA	25.76	NA	20.40	NA	38.18	NA	42.06	NA	33.11	NA	31.80	NA	35.04	NA	27.76	NA
8	32.47	35.71	28.43	23.87	NA	26.25	NA	20.90	NA	38.85	NA	42.85	NA	34.12	NA	32.47	NA	35.71	NA	28.43	NA
9	33.04	36.28	29.00	24.29	NA	26.67	NA	21.32	NA	39.45	NA	43.54	NA	34.80	NA	33.04	NA	36.28	NA	29.00	NA
10	33.58	36.82	29.54	24.68	NA	27.06	NA	21.71	NA	40.00	NA	44.19	NA	35.45	NA	33.58	NA	36.82	NA	29.54	NA
11	34.12	37.35	30.28	25.05	NA	27.45	NA	22.11	NA	40.54	NA	44.83	NA	36.09	NA	34.12	NA	37.35	NA	30.28	NA
12	34.64	37.88	30.90	25.48	NA	27.84	NA	22.48	NA	41.06	NA	45.46	NA	36.72	NA	34.64	NA	37.88	NA	30.90	NA
13	35.13	38.37	31.59	25.82	NA	28.20	NA	22.85	NA	42.15	NA	46.04	NA	37.31	NA	35.13	NA	38.37	NA	31.59	NA
14	35.60	38.84	31.99	26.16	NA	28.54	NA	23.19	NA	42.72	NA	46.60	NA	37.87	NA	35.60	NA	38.84	NA	31.99	NA
15	36.08	39.32	32.04	26.52	NA	28.90	NA	23.55	NA	43.29	NA	47.18	NA	38.44	NA	36.08	NA	39.32	NA	32.04	NA
16	36.84	39.76	32.90	26.88	NA	29.24	NA	23.89	NA	43.85	NA	47.74	NA	39.00	NA	36.84	NA	39.76	NA	32.90	NA
17	36.99	40.23	32.95	27.19	NA	29.57	NA	24.22	NA	44.38	NA	48.27	NA	39.54	NA	36.99	NA	40.23	NA	32.95	NA
18	37.41	40.85	33.37	27.50	NA	29.86	NA	24.53	NA	44.89	NA	48.78	NA	40.05	NA	37.41	NA	40.85	NA	33.37	NA
19	37.81	41.05	33.77	27.79	NA	30.17	NA	24.82	NA	45.39	NA	49.27	NA	40.53	NA	37.81	NA	41.05	NA	33.77	NA
20	38.20	41.44	34.16	28.08	NA	30.46	NA	25.11	NA	45.84	NA	49.73	NA	40.96	NA	38.20	NA	41.44	NA	34.16	NA

IDAHO POWER  
LEVELIZED RATES  
PROJECT ON-LINE IN 2024

Contract Length	Levelized Price			Season 1 Pricing (73.5%)						Season 2 Pricing (129%)						Season 3 Pricing (109%)					
	Hour and Light Load			Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	Hour Differential	Hour	Light Load Hour	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment	Price	Price less value integration adjustment
1	27.53	30.27	22.99	19.87	NA	22.25	NA	16.90	NA	32.44	NA	38.32	NA	27.59	NA	27.03	NA	30.27	NA	22.99	NA
2	28.50	31.84	24.56	21.02	NA	23.40	NA	18.05	NA	34.32	NA	39.21	NA	29.47	NA	28.00	NA	31.84	NA	24.56	NA
3	30.11	33.85	25.07	22.13	NA	24.51	NA	19.16	NA	36.13	NA	40.02	NA	31.28	NA	30.11	NA	33.85	NA	25.07	NA
4	31.38	34.63	27.35	23.07	NA	25.45	NA	20.10	NA	37.87	NA	41.95	NA	32.82	NA	31.38	NA	34.63	NA	27.35	NA
5	32.45	35.00	28.41	23.85	NA	26.23	NA	20.88	NA	39.84	NA	42.83	NA	34.09	NA	32.45	NA	35.00	NA	28.41	NA
6	33.29	36.53	29.25	24.47	NA	26.85	NA	21.50	NA	39.95	NA	43.84	NA	35.10	NA	33.29	NA	36.53	NA	29.25	NA
7	33.83	37.17	29.89	24.94	NA	27.32	NA	21.97	NA	40.71	NA	44.80	NA	35.86	NA	33.83	NA	37.17	NA	29.89	NA
8	34.46	37.70	30.42	25.33	NA	27.71	NA	22.36	NA	41.35	NA	45.24	NA	36.51	NA	34.46	NA	37.70	NA	30.42	NA
9	34.88	38.22	30.94	25.71	NA	28.09	NA	22.74	NA	41.87	NA	45.86	NA	37.13	NA	34.88	NA	38.22	NA	30.94	NA
10	35.50	38.74	31.45	26.09	NA	28.47	NA	23.12	NA	42.80	NA	46.49	NA	37.75	NA	35.50	NA	38.74	NA	31.45	NA
11	36.01	39.25	31.87	26.47	NA	28.85	NA	23.50	NA	43.21	NA	47.10	NA	38.35	NA	36.01	NA	39.25	NA	31.87	NA
12	36.49	39.73	32.45	26.82	NA	29.20	NA	23.85	NA	43.78	NA	47.68	NA	38.84	NA	36.49	NA	39.73	NA	32.45	NA



13	36.98	40.20	32.82	27.17	NA	29.55	NA	24.20	NA	44.26	NA	48.24	NA	39.50	NA	36.98	NA	40.20	NA	32.82	NA
14	37.44	40.88	33.40	27.52	NA	29.90	NA	24.55	NA	44.80	NA	48.82	NA	40.08	NA	37.44	NA	40.88	NA	33.40	NA
15	37.92	41.18	33.88	27.87	NA	30.25	NA	24.90	NA	45.30	NA	49.38	NA	40.65	NA	37.92	NA	41.18	NA	33.88	NA
16	38.37	41.61	34.33	28.20	NA	30.58	NA	25.23	NA	45.84	NA	49.83	NA	41.19	NA	38.37	NA	41.61	NA	34.33	NA
17	38.80	42.04	34.78	28.52	NA	30.90	NA	25.55	NA	46.36	NA	50.44	NA	41.71	NA	38.80	NA	42.04	NA	34.78	NA
16	38.21	42.45	35.17	28.82	NA	31.20	NA	25.85	NA	46.85	NA	50.94	NA	42.20	NA	38.21	NA	42.45	NA	35.17	NA
19	38.80	42.84	35.56	29.11	NA	31.48	NA	26.14	NA	47.52	NA	51.41	NA	42.67	NA	38.80	NA	42.84	NA	35.56	NA
20	39.89	43.23	35.95	29.39	NA	31.77	NA	26.42	NA	47.98	NA	51.87	NA	43.13	NA	39.89	NA	43.23	NA	35.95	NA

IDAHO POWER  
LEVELIZED RATES  
PROJECT ON-LINE IN 2028

Contract Length	Levelized Price				Season 1 Pricing (72.5%)						Season 2 Pricing (159%)				Season 3 Pricing (169%)							
	Heavy and Light Load		Hour Differential		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment
1	30.30	33.54	28.28	22.27	NA	24.85	NA	19.30	NA	35.36	NA	40.24	NA	31.51	NA	30.30	NA	33.54	NA	28.28	NA	
2	31.84	35.08	27.80	23.40	NA	25.78	NA	20.43	NA	36.21	NA	42.09	NA	33.36	NA	31.84	NA	35.08	NA	27.80	NA	
3	33.09	36.33	29.05	24.32	NA	26.70	NA	21.36	NA	36.70	NA	43.50	NA	34.86	NA	33.09	NA	36.33	NA	29.05	NA	
4	34.10	37.34	30.06	25.08	NA	27.44	NA	22.08	NA	40.82	NA	44.80	NA	36.07	NA	34.10	NA	37.34	NA	30.06	NA	
5	34.87	38.11	30.83	25.83	NA	28.01	NA	22.86	NA	41.84	NA	45.73	NA	36.99	NA	34.87	NA	38.11	NA	30.83	NA	
6	35.43	38.67	31.39	26.04	NA	28.42	NA	23.07	NA	42.81	NA	46.40	NA	37.86	NA	35.43	NA	38.67	NA	31.39	NA	
7	35.90	39.14	31.86	26.39	NA	28.77	NA	23.42	NA	43.06	NA	46.87	NA	38.23	NA	35.90	NA	39.14	NA	31.86	NA	
8	36.37	39.61	32.33	26.73	NA	29.11	NA	23.78	NA	43.85	NA	47.83	NA	38.80	NA	36.37	NA	39.61	NA	32.33	NA	
9	36.86	40.10	32.82	27.09	NA	29.46	NA	24.13	NA	44.24	NA	48.12	NA	39.39	NA	36.86	NA	40.10	NA	32.82	NA	
10	37.38	40.60	33.32	27.46	NA	29.84	NA	24.49	NA	44.83	NA	48.72	NA	39.98	NA	37.38	NA	40.60	NA	33.32	NA	
11	37.83	41.07	33.79	27.81	NA	30.18	NA	24.84	NA	45.40	NA	49.29	NA	40.65	NA	37.83	NA	41.07	NA	33.79	NA	
12	38.29	41.53	34.28	28.14	NA	30.52	NA	25.17	NA	46.06	NA	49.84	NA	41.10	NA	38.29	NA	41.53	NA	34.28	NA	
13	38.77	42.01	34.73	28.50	NA	30.86	NA	25.53	NA	46.83	NA	50.41	NA	41.68	NA	38.77	NA	42.01	NA	34.73	NA	
14	39.25	42.48	35.21	28.85	NA	31.23	NA	25.88	NA	47.10	NA	50.90	NA	42.25	NA	39.25	NA	42.48	NA	35.21	NA	
15	39.71	42.95	35.67	29.18	NA	31.57	NA	26.21	NA	47.85	NA	51.53	NA	42.80	NA	39.71	NA	42.95	NA	35.67	NA	
16	40.14	43.38	36.10	29.50	NA	31.89	NA	26.53	NA	48.17	NA	52.05	NA	43.32	NA	40.14	NA	43.38	NA	36.10	NA	
17	40.58	43.80	36.52	29.81	NA	32.19	NA	26.84	NA	48.67	NA	52.56	NA	43.82	NA	40.58	NA	43.80	NA	36.52	NA	
18	40.98	44.20	36.92	30.11	NA	32.48	NA	27.14	NA	49.15	NA	53.04	NA	44.30	NA	40.98	NA	44.20	NA	36.92	NA	
19	41.36	44.56	37.31	30.39	NA	32.76	NA	27.42	NA	49.83	NA	53.61	NA	44.77	NA	41.36	NA	44.56	NA	37.31	NA	
20	41.74	44.98	37.70	30.68	NA	33.06	NA	27.71	NA	50.09	NA	53.98	NA	45.24	NA	41.74	NA	44.98	NA	37.70	NA	

IDAHO POWER  
LEVELIZED RATES  
PROJECT ON-LINE IN 2028

Contract Length	Levelized Price				Season 1 Pricing (72.5%)						Season 2 Pricing (159%)				Season 3 Pricing (169%)							
	Heavy and Light Load		Hour Differential		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour		Flat		Heavy Load Hour		Light Load Hour	
	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment	Price	Price less wind integration adjustment
1	33.51	36.75	29.47	24.83	NA	27.01	NA	21.68	NA	40.21	NA	44.10	NA	35.38	NA	33.51	NA	36.75	NA	29.47	NA	
2	34.56	37.80	30.61	25.47	NA	27.85	NA	22.50	NA	41.59	NA	45.47	NA	36.74	NA	34.56	NA	37.80	NA	30.61	NA	
3	35.58	38.81	31.83	26.16	NA	28.53	NA	23.18	NA	42.89	NA	46.38	NA	37.84	NA	35.58	NA	38.81	NA	31.83	NA	
4	36.25	39.49	32.21	26.85	NA	29.03	NA	23.88	NA	43.51	NA	47.39	NA	38.98	NA	36.25	NA	39.49	NA	32.21	NA	
5	36.72	39.98	32.66	27.06	NA	29.37	NA	24.02	NA	44.06	NA	47.85	NA	39.21	NA	36.72	NA	39.98	NA	32.66	NA	
6	37.12	40.36	33.08	27.28	NA	29.66	NA	24.31	NA	44.84	NA	48.43	NA	39.89	NA	37.12	NA	40.36	NA	33.08	NA	
7	37.55	40.78	33.80	27.60	NA	29.96	NA	24.63	NA	45.05	NA	48.94	NA	40.21	NA	37.55	NA	40.78	NA	33.80	NA	
8	38.01	41.25	33.87	27.84	NA	30.32	NA	24.87	NA	45.82	NA	49.50	NA	40.77	NA	38.01	NA	41.25	NA	33.87	NA	
9	38.50	41.74	34.46	28.29	NA	30.59	NA	25.32	NA	46.20	NA	50.08	NA	41.35	NA	38.50	NA	41.74	NA	34.46	NA	
10	38.89	42.20	34.82	28.64	NA	31.02	NA	25.87	NA	46.79	NA	50.64	NA	41.81	NA	38.89	NA	42.20	NA	34.82	NA	
11	39.42	42.86	35.38	28.97	NA	31.36	NA	26.00	NA	47.30	NA	51.19	NA	42.45	NA	39.42	NA	42.86	NA	35.38	NA	
12	39.91	43.16	35.87	29.33	NA	31.71	NA	26.36	NA	47.89	NA	51.78	NA	43.04	NA	39.91	NA	43.16	NA	35.87	NA	
13	40.39	43.63	36.36	29.89	NA	32.07	NA	26.72	NA	48.47	NA	52.38	NA	43.82	NA	40.39	NA	43.63	NA	36.36	NA	
14	40.86	44.10	36.82	30.03	NA	32.41	NA	27.00	NA	49.03	NA	52.92	NA	44.18	NA	40.86	NA	44.10	NA	36.82	NA	
15	41.31	44.54	37.26	30.36	NA	32.74	NA	27.39	NA	49.57	NA	53.45	NA	44.72	NA	41.31	NA	44.54	NA	37.26	NA	
16	41.73	44.97	37.69	30.67	NA	33.05	NA	27.70	NA	50.05	NA	53.98	NA	45.23	NA	41.73	NA	44.97	NA	37.69	NA	

17	42.14	45.38	38.10	30.97	NA	33.38	NA	28.00	NA	50.57	NA	54.46	NA	45.72	NA	42.14	NA	45.38	NA	38.10	NA
18	42.55	45.79	38.51	31.27	NA	33.65	NA	28.30	NA	51.06	NA	54.94	NA	46.21	NA	42.55	NA	45.79	NA	38.51	NA
19	42.95	46.19	38.91	31.57	NA	33.95	NA	28.60	NA	51.54	NA	55.43	NA	46.69	NA	42.95	NA	46.19	NA	38.91	NA
20	43.34	46.58	39.30	31.86	NA	34.24	NA	28.89	NA	52.01	NA	55.90	NA	47.16	NA	43.34	NA	46.58	NA	39.30	NA

<b>Staff Published Rate Analysis - Difference between IRP-based Rates and Published Rates using Company's IRP-based Calculations from Compliance Filing. The Capacity Price comparison is for year 2029.</b>						
	<b>Scenario 1: IRP-based Scenario - Example from Company's Compliance Filing for Year 2029 (SCCT Surrogate from 2017 IRP - QF Generation during Peak Hours based on generation profile)</b>	<b>Scenario 1a: IRP-based Scenario - Replace 2017 IRP SCCT Surrogate with SAR-based CCCT Surrogate</b>	<b>Scenario 1b: IRP-based Scenario - Replace QF Annual Generation during Peak Hours for generation based on generation profile with value calculated using Nameplate Capacity, Peak Hour Capacity Factor, and Annual Peak Hours.</b>	<b>Scenario 2: SAR-based Scenario - SAR-based CCCT Surrogate - QF Generation during Peak Hours calculated using Nameplate Capacity, Peak Hour Capacity Factor, and Annual Peak Hours.</b>	<b>Scenario 2a: SAR-based Scenario - Published Rate CCCT Surrogate - Different Peak-hour Capacity Factor.</b>	
	SCCT	CCCT	SCCT	CCCT	CCCT	CCCT
1 Surrogate						
2 Annual Peak Hours - IPC Compliance Filing (hrs)	434	434	434	434	434	434
3 Capital Cost (\$/kw/month)	\$ 8.64	\$ 14.32	\$ 8.64	\$ 14.32	\$ 14.32	\$ 14.32
4 Fixed O&M (\$/kw/month)	\$ 2.04	\$ 1.84	\$ 2.04	\$ 1.84	\$ 1.84	\$ 1.84
5 Cost of Surrogate (\$/kw/month)	\$ 10.68	\$ 16.16	\$ 10.68	\$ 16.16	\$ 16.16	\$ 16.16
6 Cost of Surrogate (\$/kw/year)	\$ 128.16	\$ 193.95	\$ 128.16	\$ 193.95	\$ 193.95	\$ 193.95
7 Nameplate Capacity (kW)	20000	20000	20000	20000	20000	20000
8 Peak-hour Capacity Factor	0.84	0.84	0.84	0.84	0.84	1
9 Effective capacity at peak (kw)	16800	16800	16800	16800	16800	20000
11 Annual Avoided Cost (\$/year)	\$ 2,153,088	\$ 3,258,378	\$ 2,153,088	\$ 3,258,378	\$ 3,879,022	\$ 3,879,022
12 QF Generation during Peak Hours (kwh)	8339000	8339000	7291200	7291200	8680000	8680000
13 Year 2029 Capacity Price (\$/kwh)	\$ 0.2582	\$ 0.3907	\$ 0.2953	\$ 0.4469	\$ 0.4469	\$ 0.4469
14 Difference between Scenario 2a and Scenario 2						\$ -
15 Difference between Scenario 1a and Scenario 1			\$ 0.1325			
16 Difference between Scenario 1b and Scenario 1				\$ 0.0371		
17 Difference between Scenario 2 and Scenario 1a					\$ 0.0562	
18 Total Difference between IRP and SAR (Difference between Scenario 2 and Scenario 1)					\$ 0.1887	
19 Percent contribution of the total difference			70%		30%	

Note 1: The QF generation during peak hours for the IRP method (Scenario 1 and 1a) uses the amount of generation during peak hours in the generation profile from the example used in the Company's compliance filing.

Note 2: The QF generation during Peak Hours in Scenario 1b, 2 and 2a is calculated by multiplying the Nameplate Capacity by the Peak-hour capacity factor and by the Annual Peak Hours.

Note 3: The SAR-method Capacity Price in Scenario 2 does not change regardless of the peak-hour capacity factor which is illustrated by the difference between Scenario 2 and 2a. The peak-hour capacity factor cancels out when determining Capacity Price since it is used as a multiplier to determine the Annual Avoided Cost (the numerator of the Capacity Price equation) and is also used as a multiplier to determine the QF generation during Peak Hours (the denominator of the Capacity Price equation).