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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-20-18
APPROVAL OF THE FIRST AMENDMENT)	
TO THE BLIND CANYON HYDRO)	
PROJECT)	COMMENTS OF THE
)	COMMISSION STAFF
)	

The Staff of the Idaho Public Utilities Commission comments as follows on Idaho Power Company's Application.

BACKGROUND

On April 3, 2020, Idaho Power Company ("Idaho Power" or "Company") filed an Application with the Commission requesting approval of an amendment to its Energy Sales Agreement with the Blind Canyon hydro project ("Blind Canyon"). Blind Canyon is a qualifying facility under the Public Utility Regulatory Policies Act of 1978. The Amendment addresses when the Seller must notify the Company in order to revise future monthly Estimated Net Energy Amounts.

The Commission approved Idaho Power's ESA with Blind Canyon in 2014. Order No. 33191. Idaho Power asks the Commission to approve the Amendment to the ESA, which the parties agreed to on March 26, 2020.

The Amendment changes when Blind Canyon must notify Idaho Power in order to revise future monthly Estimated Net Energy Amounts. Currently, Section 6.2.3 of the ESA requires Blind Canyon to notify Idaho Power at least one month before the Seller revises a given month's Estimated Net Energy Amount. The Amendment states that "[a]fter the Operation Date, the Seller must revise any future monthly Estimated Net Energy Amounts by providing written notice no later than 5 PM Mountain Standard time on the 25th day of the month that is prior to the month to be revised." Application at 2-3, Att. 1. If the 25th day falls on a weekend or holiday, Idaho Power must receive written notice by the last business day prior to the 25th day of the month.

STAFF ANALYSIS

Staff recommends approval of the proposed Amended Energy Sales Agreement between Idaho Power and Blind Canyon. Section 6.2.3 of the existing ESA will be replaced to allow the Seller to adjust Estimated Net Energy Amounts, which are provided to Idaho Power to comply with 90/110 firmness requirements, with a five-day advanced notice instead of a one month advanced notification in the currently approved ESA.

The Commission has approved a five-day revision to monthly generation estimates in previous cases, recognizing that Estimated Net Energy Amounts that are closer to the time of delivery can improve the accuracy of input used by the Company for short-term operational planning. *See, e.g.*, case Nos. IPC-E-19-01, IPC-E-19-03, IPC-E-19-04, IPC-E-19-07, and IPC-E-19-12. With an original operation date of December 14, 1994, Staff believes a five-day notice for generation estimate adjustments is sufficient because the Company has a well-established generation history for the Blind Canyon hydro project.

STAFF RECOMMENDATIONS

Staff recommends the Commission approve the Amendment to the Energy Sales Agreement for the Blind Canyon hydro project, with all other terms and conditions to remain unchanged.

Respectfully submitted this 20th day of May 2020.



Edward J. Jewell
Deputy Attorney General

Technical Staff: Rachelle Farnsworth
Yao Yin

i:umisc/comments/ipce20.18ejrfyy comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 20th DAY OF MAY 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-20-18, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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