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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-20-38**
APPROVAL OR REJECTION OF A SECOND)
AMENDMENT TO THE ENERGY SALES)
AGREEMENT WITH ID SOLAR 1, LLC) **COMMENTS OF THE**
) **COMMISSION STAFF**
)

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

BACKGROUND

On December 11, 2020, Idaho Power Company asked the Commission to approve or reject an amendment to its Energy Sales Agreement ("ESA") with ID Solar 1, LLC ("ID Solar 1"). ID Solar 1 is a 40 MW nameplate capacity qualifying facility ("QF") under the Public Utility Regulatory Policies Act of 1978.

The proposed amendment would allow ID Solar 1 to adjust its monthly estimated net energy amount by the 25th day of each month, whereas the current provision requires ID Solar 1 to provide its monthly estimated net energy amount one month in advance.

In July 2014, Idaho Power entered an ESA to buy energy and capacity from the QF. Order No. 33180, IPC-E-14-20. The QF was later transferred from Boise City Solar, LLC to Idaho Solar 1. Order No. 33596, IPC-E-16-20.

STAFF ANALYSIS

Staff recommends approval of the proposed Amended ESA between Idaho Power and ID Solar 1. If approved by the Commission, Section 6.2.2 of the existing ESA would be replaced to allow the Seller to adjust its monthly estimated net energy amount with at least five-day advanced notice instead of at least one-month advanced notice contained in the currently approved ESA.

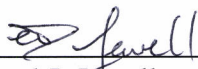
The Commission has allowed five-day advanced notice to revise monthly generation estimates in previous cases for both existing projects (such as in Case Nos. IPC-E-19-01, IPC-E-19-03, IPC-E-19-04, IPC-E-19-07, and IPC-E-19-12) and new projects (such as in Case No. IPC-E-20-27).

All of these previously approved projects are surrogate avoided resource method (“SAR Method”) projects; however, this case is the first Integrated Resource Planning method (“IRP Method”) project requesting the same amendment. Updating monthly generation estimates for SAR Method projects closer to the time of delivery can improve the accuracy of input used by the Company for short-term operational planning, which in turn could lower operational costs. Staff believes it is a reasonable assumption that increased accuracy from larger IRP Method projects can provide at least the same benefit.

STAFF RECOMMENDATIONS

Staff recommends the Commission approve the Amendment to the Energy Sales Agreement between Idaho Power and ID Solar 1, with all other terms and conditions to remain unchanged.

Respectfully submitted this ^{4th} day of February 2021.



Edward J. Jewell
Deputy Attorney General

Technical Staff: Yao Yin

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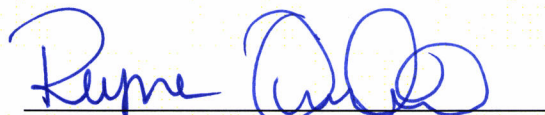
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 4th DAY OF FEBRUARY 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-20-38, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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