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JULIA HILTON
Deputy General Counsel
JHilton@idahopower.com

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THE COMMENT

March 25, 2021

VIA ELECTRONIC FILING

Jan Noriyuki, Secretary Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg 8, Suite 201-A (83714) PO Box 83720 Boise, Idaho 83720-0074

Re:

Case No. IPC-E-21-06

In the Matter of Idaho Power Company's Petition to Extend the Filing Date of Its

2021 Integrated Resource Plan

Dear Ms. Noriyuki:

Enclosed for electronic filing, pursuant to Order No. 34781, please find Idaho Power Company's Petition to Extend the Filing Date of Its 2021 Integrated Resource Plan, in the above-entitled matter.

If you have any questions about the enclosed documents, please do not hesitate to contact me.

Very truly yours,

Julia Hilton

JH:slb Enclosures LISA D. NORDSTROM (ISB No. 5733) JULIA HILTON (ISB No. 7740) Idaho Power Company P.O. Box 70 Boise, Idaho 83707

Tel: 208-388-5825 Fax: 208-338-6936

<u>LNordstrom@idahopower.com</u> <u>JHilton@idahopower.com</u>

Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

COMPANY'S PETITION TO EXTEND THE FILING DATE OF ITS 2021 INTEGRATED) CASE NO. IPC-E-21-06
RESOURCE PLAN) PETITION
)

COMES NOW, Idaho Power Company ("Idaho Power" or the "Company") in accordance with RP 053, petitions the Idaho Public Utilities Commission ("Commission") to modify Order No. 30317 issued on May 23, 2007, in Case No. IPC-E-06-24, in which the Commission directed Idaho Power to file its next full Integrated Resource Plan ("IRP") "no later than the last business day of June 2009." (Order No. 30317, p. 2.) In order to allow for more opportunity for stakeholder participation and comment, Idaho Power requests that the Commission modify the filing date for the 2021 IRP from the last business day of June 2021 to no later than the last business day of December 2021.

I. BACKGROUND

- 1. Idaho Power's IRP examines the demand for energy over the next 20 years and the best ways to meet that demand for its customers. The IRP is updated every two years and describes the Company's projected need for additional electricity and the resources necessary to meet that need while balancing reliability, environmental responsibility, efficiency, risk, and cost.
- 2. In Order No. 30317, the Commission reviewed the IRP filing dates for its jurisdictional electric utilities—Idaho Power, Rocky Mountain Energy, and Avista Energy—and directed Idaho Power to file its biennial IRP no later than the last business day of June 2009.
- Idaho Power has subsequently filed its IRPs by the last business day of June in odd-numbered years, with one exception: an extension of filing the 2009 IRP approved by Commission Order No. 30815.
- 4. Idaho Power filed its 2019 IRP in June of 2019; processing the 2019 IRP took longer than most IRP dockets due to a number of factors, including time necessary to ensure accuracy and accommodate the learning curve associated with use of a new resource model. Due to the timing impact the extended 2019 IRP process is expected to have on the 2021 IRP and in order to allow for more opportunity for stakeholder participation and comment, Idaho Power requested Commission authorization to delay the filing of its 2021 IRP in its reply comments in Docket No. IPC-E-19-19.
- 5. The Commission acknowledged Idaho Power's 2019 IRP in Order No. 34959 issued on March 16, 2021. However, with respect to the Company's request for authorization to delay filing its 2021 IRP, the Commission directed Idaho Power to file a

petition requesting an extension in order to allow all parties the opportunity to comment. (Order No. 34959, p 26). In response to the Commission's directive, Idaho Power submits this petition requesting that the Commission modify the filing date for the 2021 IRP from the last business day of June 2021 to no later than the last business day of December 2021.

II. 2021 IRP

6. With the assistance of its customers and stakeholders through its IRP Advisory Council ("IRPAC"), Idaho Power has begun the process of developing its 2021 IRP. The IRPAC consists of members of major industrial customers, irrigation representatives, elected officials, members of the environmental community, public utility commission representatives, and other interested parties. A series of public meetings have been, and are scheduled to be, conducted online. Although future meeting dates and topics are subject to change, the process to collect stakeholder input is currently scheduled as follows:

Meeting	Date	Topics
Energy Efficiency Subcommittee Meeting	January 12	Energy Efficiency
IRPAC Meeting #1	February 9	Overview, Carbon Outlook
Load Forecast Workshop	February 23	
IRPAC Meeting #2	March 11	Forecasts (CSPP, Natural Gas, Load)
IRPAC Meeting #3	April 8	Hydro System, Solar & Storage, EE, DR
AURORA Modeling Workshop	April 22	
IRPAC Meeting #4	May 13	Resource Adequacy, Transmission, Future Supply-Side Resources

IRPAC Meeting #5	June 10	T&D Deferral, Reserve Requirements, Storage, DER
IRPAC Meeting #6	July 13	Portfolio Development & Sensitivities, Risk Metrics
Optional: Analysis Update & Feedback Workshop	August 10	
IRPAC Meeting #7	September 16	Results, Preferred Portfolio

- 7. The IRP process allows the Commission to evaluate a utility's planned resources and ensure they are reasonable, cost effective, and necessary to ensure that the Company's customers receive adequate services at reasonable rates. The process also encourages substantial public participation in the plan preparation.
- 8. Based upon this planned schedule, Idaho Power will not be able to take full advantage of the IRPAC's input and expertise prior to filing in June of 2021. Idaho Power believes that its customers are best served by an IRP that has been fully discussed and which has allowed stakeholders to have ample time to provide input. Accordingly, additional time to file the Company's 2021 IRP will better serve Idaho Power's customers.
- 9. Permitting the Company to delay filing until the end of 2021 will ensure a more complete IRPAC process. Idaho Power believes such a delay is in the public interest and good cause exists to allow the modification of the filing date to more fully allow public participation prior to filing.

III. COMMUNICATIONS

10. Service of pleadings, exhibits, orders, and other documents relating to this proceeding should be served upon the following:

Lisa Nordstrom Lead Counsel Idaho Power Company P.O. Box 70 Boise, ID 83707

LNordstrom@idahopower.com IPCDockets@idahopower.com Alison Williams Regulatory Policy and Strategy Advisor Idaho Power Company P.O. Box 70 Boise, ID 83707

AWilliams@idahopower.com

IV. MODIFIED PROCEDURE

11. Idaho Power believes that consideration of this petition does not require an evidentiary proceeding and accordingly the Company requests that this Application be processed under RP 201 allowing for consideration of issues under Modified Procedure, i.e., by written submissions rather than by evidentiary hearing.

V. CONCLUSION

12. Based on the foregoing, Idaho Power respectfully requests that the Commission issue its Order modifying the filing date for the Company's 2021 IRP from the last business day of June 2021 to no later than the last business day of December 2021.

Respectfully submitted this 25th day of March 2021.

JULIA HILTON

Attorney for Idaho Power Company