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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER** )  
**COMPANY’S PETITION TO EXTEND THE** ) **CASE NO. IPC-E-21-06**  
**FILING DATE OF ITS 2021 INTEGRATED** )  
**RESOURCE PLAN** )  
 ) **COMMENTS OF THE**  
 ) **COMMISSION STAFF**  
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**COMES NOW** the Staff of the Idaho Public Utilities Commission (“Staff”), by and through its attorney of record, John R. Hammond, Jr., Deputy Attorney General, and in response to the Notice of Application and Modified Procedure issued in Order No. 35007 on April 16, 2021, in Case No. IPC-E-21-06, submits the following comments.

**BACKGROUND**

On March 25, 2021, Idaho Power Company (“Company”) petitioned the Commission to extend the filing date for the Company’s 2021 Integrated Resource Plan (“IRP”) from the last business day of June 2021 to no later than the last business day of December 2021.

The IRP examines the anticipated demand for energy over the next 20 years and the least-cost, least-risk alternatives for the Company to meet that demand while balancing reliability, environmental responsibility, efficiency, risk, and cost. The IRP is updated every two years.

The Company's IRP is typically due on the last business day of June in odd-numbered years. The Company requests the filing date for its 2021 IRP to be moved from the last business day of June 2021 to no later than the last business day of December 2021.

The Company's 2019 IRP was significantly delayed to provide accuracy and accommodate the learning curve associated with using a new long-term capacity expansion model to develop potential resource portfolios. The Commission did not acknowledge the Company's 2019 IRP until March 2021. Because of the longer than anticipated processing of the 2019 IRP, the Company requests extension of the 2021 IRP filing deadline to allow for more stakeholder participation and comment.

### **STAFF ANALYSIS**

Staff believes there will be limited impact to upcoming filings that are dependent upon the IRP. Staff recommends that the Commission grant the Company's request for filing the 2021 IRP no later than the last business day of December 2021.

### IRP Advisory Council ("IRPAC")

Staff supports the thorough development and analysis of a least-cost, least-risk integrated resource plan. The IRPAC membership consists 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 held online in the months of May, June, July, and final meeting scheduled in September. The Company states that they cannot take full advantage of the IRPAC's input and expertise prior to filing in June of 2021 and believes its customers are best served by an IRP that has been fully discussed and stakeholders have ample time to provide input prior to its filing. Staff supports the Company's willingness to continue to hold public meetings to collect stakeholder input and the Company should continue to hold IRPAC meetings and keep to the scheduled dates to keep the filing on time for the last business day of December 2021. Staff believes it is appropriate to permit the IRP extension to allow the Company time to resolve issues and concerns that are discussed in IRPAC meetings.

Related IRP Cases

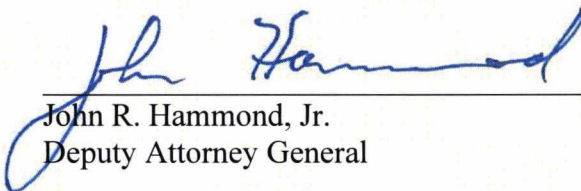
Considering the proposed IRP filing delay, Staff believes the *Annual Load and Natural Gas Forecast Update* case should not be affected. The updated forecasts become effective on October 15<sup>th</sup> of each year, and the Company typically uses the latest load and natural gas forecasts available at that time.

Staff recognizes that the IRP delay will lead to a delayed update of the *First Capacity Deficiency Date* used for avoided cost pricing under both the Surrogate Avoided Resource Method and the IRP Method, since the *First Capacity Deficiency Date* case is filed after acknowledgement of each IRP. See Order Nos. 33917 and 34649. A delay in the filing of this case will result in extending the currently acknowledged First Capacity Deficiency Date for a longer period. The timing when capacity payments will begin for new PURPA contracts depends on whether the new First Capacity Deficiency Date is earlier or later than the currently acknowledged First Capacity Deficiency Date.

**STAFF RECOMMENDATIONS**

Staff recommends the Commission grant an extension for filing the 2021 IRP from the last business day of June 2021 to no later than the last business day of December 2021.

Respectfully submitted this 6<sup>th</sup> day of May 2021.

  
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John R. Hammond, Jr.  
Deputy Attorney General

Technical Staff: Travis Culbertson  
Kevin Keyt  
Yao Yin

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 6<sup>th</sup> DAY OF MAY 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-21-06, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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