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IDAHO PUBLIC  
UTILITIES COMMISSION

**DONOVAN E. WALKER**  
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April 7, 2022

**VIA ELECTRONIC MAIL**

Jan Noriyuki, Secretary  
Idaho Public Utilities Commission  
11331 West Chinden Blvd., Building 8  
Suite 201-A  
Boise, Idaho 83714

Re: Case No. IPC-E-21-09  
Idaho Power Company's Application for Capacity Deficiency To Be Utilized  
For Avoided Cost Calculations

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Reply Comments in the above entitled matter. If you have any questions about the attached documents, please do not hesitate to contact me.

Please be aware that Attachment No. 1 is **confidential**. Please handle the confidential information in accordance with the Protective Agreement executed in this matter.

Very truly yours,

Donovan E. Walker

DEW:cld  
Enclosures

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	
COMPANY'S APPLICATION FOR	)	CASE NO. IPC-E-21-09
APPROVAL OF THE CAPACITY	)	
DEFICIENCY TO BE UTILIZED FOR	)	IDAHO POWER COMPANY'S
AVOIDED COST CALCULATIONS	)	REPLY COMMENTS
	)	
	)	

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Idaho Power Company ("Idaho Power" or "Company") herby respectfully submits the following Reply Comments pursuant to the Idaho Public Utilities Commission's ("Commission" or "IPUC") Order No. 35346, Notice of Amended Application/Notice of Modified Procedure.

**I. BACKGROUND**

The original Application in this matter, Case No. IPC-E-21-09, was filed by Idaho Power on April 9, 2021. The Application was made after the Commission's acknowledgment of the Company's Second Amended 2019 Integrated Resource Plan ("IRP"), and pursuant to Order No. 34649, Case No. IPC-E-19-20.<sup>1</sup> The Industrial

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<sup>1</sup> Order No. 34649 dismissed Idaho Power's previously filed Application for approval of the capacity deficiency to be utilized for avoided cost calculations that was made at the time of filing of the 2019 IRP and directed the Company to make the filing after Commission acknowledgment of the IRP.

Customers of Idaho Power (“ICIP”) and the Idaho Hydroelectric Power Producers Trust (“IdaHydro”) were granted intervention on June 23, 2021. Order No. 35084. Commission Staff (“Staff”) and IdaHydro filed Comments on July 21, 2021. ICIP did not file Comments. Idaho Power filed Reply Comments on July 28, 2021, agreeing and accepting Staff’s recommended changes and adjustments to the capacity deficiency determination. The Case appeared as a “fully submitted” matter on the Commission’s October 12, 2021, Decision Meeting, where the Commission determined that the matter was fully submitted and would be deliberated privately.<sup>2</sup>

On February 4, 2022, Idaho Power filed an Amended Application concurrent with a Motion for leave to file the same. On March 15, 2022, the Commission issued Order No. 35346 Notice of Amended Application and Amended Notice of Modified Procedure. IdaHydro filed Comments pursuant to the Amended Application on March 29, 2022, and Staff filed Amended Comments on March 31, 2022. IdaHydro filed Reply Comments on April 6, 2022.

## **II. COMMENTS**

Idaho Power’s Amended Application seeks the establishment of July 2023 as the first capacity deficit, consistent with the Company’s filed 2021 Integrated Resource Plan. Idaho Hydro’s Reply Comments reiterated its request to set the first capacity deficit for PURPA pricing at July 2023. Staff, in its Amended Comments, recommends that the Company file an updated load and resource analysis and first capacity deficiency that incorporates at least seven bulleted adjustments and changes.

Idaho Power appreciates Staff’s thorough examination and recommendations, and

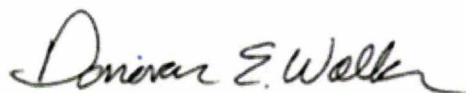
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<sup>2</sup> Idaho Public Utilities Commission Minutes of Decision Meeting, October 12, 2021, 1:30 p.m.  
<https://puc.idaho.gov/Fileroom/PublicFiles/Agenda?2021?20211013MIN.pdf>

the Company has conducted Staff's recommended adjustments to the load and resource analysis - attached hereto as Attachment 1 and incorporated herein by this reference. As shown in Attachment 1, incorporation of Staff's recommended adjustments results in no change from the July 2023 first capacity deficit requested by Idaho Power and IdaHydro and shown in the filed 2021 IRP. Consequently, Idaho Power recommends that the Commission set the first capacity deficiency for PURPA avoided cost pricing at July 2023 with no further filings or proceedings.

While it could be debated whether or not Staff's recommended adjustments to the IRP based first capacity deficit are appropriate or not for purposes of PURPA pricing, such determination is not necessary here, and moot, as incorporation of Staff's recommended adjustments makes no change to the July 2023 first capacity deficit. Further, the Company notes that this proceeding, addressing PURPA pricing, does not address whether or not the recommended adjustments are proper or necessary in the context of the IRP. The Company looks forward to discussing and working through these items with Staff and stakeholders as part of the IRP process, but for purposes of this matter respectfully requests that the Commission issue its final Order setting July 2023 as the first capacity deficiency for PURPA avoided cost pricing.

Respectfully submitted this 7<sup>th</sup> day of April 2022.



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DONOVAN E. WALKER  
Attorney for Idaho Power Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 7<sup>th</sup> day of April 2022 I served a true and correct copy of the within and foregoing Idaho Power Company's Reply Comments upon the following named parties by the method indicated below, and addressed to the following:

Dayn Hardie  
Deputy Attorney General  
Idaho Public Utilities Commission  
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Christy Davenport, Legal Assistant