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Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY’S APPLICATION FOR
APPROVAL OF THE CAPACITY
DEFICIENCY TO BE UTILIZED FOR
AVOIDED COST CALCULATIONS

) Case No. IPC-E-21-09
)
) **IDAHYDRO’S COMMENTS**
)
)
)

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro (“IdaHydro”), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, and hereby submits the following comments:

In this Application, Idaho Power Company (“Idaho Power”) seeks ratification of its Second Amended 2019 Integrated Resource Plan (“IRP”) first capacity deficit date of August 2028. Subsequently, Idaho Power issued a Notice of Intent to seek requests for proposals as early as June 30, 2021, stating:

D. Need for Action

IPC's service territory continues to experience customer growth and an increasing demand load) for electricity. IPC anticipates sustained load growth that will require the procurement of new resources to meet peak summer demand and maintain system reliability. Additionally, recent changes in the regional transmission markets have constrained the transmission system external to the IPC service territory and significantly impacted the ability to import energy from western market hubs for delivery to IPC's system. The addition of new resources to meet peak demand is critical to ensure IPC can continue to reliably meet the growing demands on its electrical system and serve its customers. The need for additional capacity resources has been identified as early as Summer 2023 at approximately BOMW, with peak deficits that grow to approximately 400 MW

by Summer 2025.

Responding to Staff discovery, Idaho Power acknowledges in its Response to Request No. 23, “The load forecast used for the Notice of Intent is intended to represent permanent load additions.”

An anomaly, or even a contradiction, exists between the conclusion of the IRP that Idaho Power needs no new capacity until August 2028, and reaching out in requests for proposals for new capacity by 2023. While the IRP does not have the sanction of this Commission, the outcome of this *Application* will be a Commission order setting the capacity deficiency date for avoided cost purposes. If the Commission grants Idaho Power’s request for an August 2028 date rather than the Summer 2023 capacity deficiency date before which Idaho Power can fill in new capacity from all sources, Idaho Power’s marginal capacity will most probably be filled by sources other than Qualifying Facilities (“QF”), running the avoided cost capacity deficiency date further into the future on a rolling and perpetual basis because non-QF power will continue to fill the queue. It appears to violate the Public Utilities Regulatory Policy Act (“PURPA”) to forestall a capacity component in the PURPA avoided cost calculation while taking on new non-QF capacity at the same time.

Therefore, it is respectfully requested that the capacity deficiency date for PURPA QF avoided costs be set at a mid-summer month in 2023.

DATED this 21st day of July 2021.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 21st day of July 2021, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

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