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IDAHO PUBLIC UTILITIES COMMISSION

DONOVAN E. WALKER
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May 25, 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-22-16
Staff's Petition to Update Colstrip-Related Adjustable Portion of Avoided
Cost Rates for Existing PURPA Contracts

Dear Ms. Noriyuki:

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

Very truly yours,

Donovan E. Walker

DEW:cld
Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

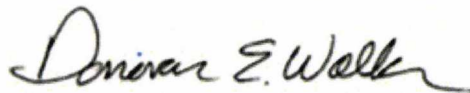
IN THE MATTER OF COMMISSION)	
STAFF'S PETITION TO UPDATE)	CASE NO. IPC-E-22-16
COLSTRIP-RELATED ADJUSTABLE)	
PORTION OF AVOIDED COST RATES)	
FOR EXISTING PURPA CONTRACTS)	COMMENTS OF IDAHO POWER
)	COMPANY
)	
)	
)	
)	

Idaho Power Company ("Idaho Power" or "Company"), in accordance with RP 201, *et seq.*, and the applicable provisions of the Public Utility Regulatory Policies Act of 1978 ("PURPA"), as well as the Idaho Public Utilities Commission's ("IPUC" or "Commission") Notice of Modified Procedure in this matter, Order No. 35402, hereby respectfully submits the following Comments to Staff's Petition.

On May 5, 2022, Commission Staff filed a Petition requesting that the Commission approve the annual revision to update the Colstrip-related adjustable portion of avoided cost rates for existing PURPA contracts. Staff's request is made pursuant to Commission

Order No. 28708¹, which established the method, known as the Colstrip Method, to be used for determining the annual adjustable-rate portion of avoided costs for those Qualifying Facility (“QF”) contracts, executed between 1990 to 1995, that use variable costs associated with Colstrip, a coal-fired generating facility in southeast Montana. Idaho Power has six contracts that utilize the Colstrip Method, the last of which will expire in September 2030. The Company has reviewed Commission Staff’s revision to the adjustable portion of the avoided cost rate for existing PURPA contracts that utilize the Colstrip Method. Idaho Power agrees that the Colstrip adjustable rate calculation employed by Staff, using data from Avista’s FERC Form 1 from Calendar Year 2021, is consistent with the method established in IPUC Order No. 28708.

Respectfully submitted this 25th day of May, 2022.



DONOVAN E. WALKER
Attorney for Idaho Power Company

¹ *In the Matter of the Investigation of the Continued Reasonableness of Using Variable Costs Associated with the Operation of Colstrip for Annual Adjustable Rate Calculations as Previously Authorized in Commission Order Nos. 23449, 26080, and 23738, Case No. GNR-E-99-01, Order No. 28708 (Apr. 17, 2001).*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of May, 2022, I served a true and correct copy of the within and foregoing COMMENTS OF IDAHO POWER COMPANY upon the following named parties by the method indicated below, and addressed to the following:

Mike Louis
Supervisor of Engineering Section
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

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 U.S. Mail
 Overnight Mail
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 Email
mike.louis@puc.idaho.gov

Dayn Hardie
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83702
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Christy Davenport, Legal Assistant