

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) CASE NO. IPC-E-26-03
COMPANY’S APPLICATION FOR)
APPROVAL OF THE 2032 ALL-SOURCE) ORDER NO. 37018
REQUEST FOR PROPOSALS)
)

On February 20, 2026, Idaho Power Company (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting approval of the Company’s draft 2032 All-Source Request for Proposals (“RFP”) for Peak Capacity & Energy Resources (“2032 RFP”) (“Application”).

The Commission granted intervention to the Idaho Irrigation Pumpers Association, Inc. (“IIPA”), the Northwest & Intermountain Power Producers Coalition (“NIPPC”), the city of Boise City (“City”), and Micron Technology, Inc. (collectively “Intervenors”). Order Nos. 36961, 36969, and 36990. NIPPC contacted the other parties proposing a Modified Procedure schedule that included a cross-reply comment deadline after a public comment deadline and before a Company reply deadline.

On March 9, 2026, the Commission issued a Notice of Modified Procedure setting written comment deadlines. Order No. 36960. Commission Staff (“Staff”), NIPPC, and IIPA filed comments. Staff and the City filed cross-reply comments. The Company filed reply comments. The Commission also received two public comments.

Having reviewed the record in this case, we now issue this Final Order approving the Company’s 2032 RFP with the modifications described below.

THE APPLICATION

The Company’s 2032 RFP is subject to the Commission’s Procedures for Soliciting Large-Supply-Side Resources (“Solicitation Procedures”), detailed in Order No. 36898. Application at 2.

The Company stated that recent regulatory filings for resource procurement have included system reliability assessments updated from the 2025 integrated resource plan (“IRP”), identifying an incremental perfect capacity deficit of at least 200 megawatts in 2031 and 2032. *Id.* at 2–3. The 2032 RFP seeks bids from all resource types with a commercial operation date between April 1, 2031, and May 31, 2032. *Id.* at 5.

The Company proposed identifying an initial shortlist of bids through a screening process that would include a price and non-price evaluation. *Id.* The Company would then use modeling tools from its IRP to identify the least-cost, least-risk portfolio from the initial shortlist. *Id.* at 6. Next, the Company would perform a reliability assessment and additional risk analysis of the selected portfolio to develop the final shortlist prior to a contract negotiation period. *Id.* at 6–7.

The Company requested Commission approval of the 2032 RFP by April 24, 2026, to provide sufficient time for bid submission and evaluation. *Id.* at 7.

On March 26, 2026, the Company notified the parties of proposed changes to 2032 RFP in response to an inquiry from a bidder. Company Comments at 1. The Company’s proposed revisions would relax the requirements for projects seeking to interconnect to the Company’s system. *Id.* at 1–2. Rather than needing a requested Network Resource Interconnection Service, a generator interconnection request from the bidder would suffice. *Id.* at 2.

STAFF INITIAL COMMENTS

Based on its belief that the Company faces significant capacity needs and that the 2032 RFP largely adheres to the Solicitation Procedures by considering all feasible resource types, Staff recommended the Commission approve the 2032 RFP solicitation and resource selection process subject to certain modifications to the bid evaluation process. Staff Comments at 2–5. First, Staff recommended that the Commission disallow the Company’s proposed imputed debt cost adder for third-party bids. *Id.* at 2. Staff also recommended that the Commission order the Company to expressly state its plan to create two competitive groups: (1) bids with a commercial operation date (“COD”) of 2031 and (2) bids with a COD of 2032. *Id.* Staff further recommended that the Commission require the Company to clarify that runner-up bids from the 2031 group will be automatically carried over for consideration in the 2032 group. *Id.* Finally, Staff recommended that the Commission direct the Company to allow Staff to perform a contemporaneous review of the selection and negotiation process. *Id.* at 3.

According to Staff, the imputed debt cost adder for third-party owned assets proposed by the Company would improperly inflate the costs of those bids. *Id.* at 5. Staff contended that (1) a change in the Company’s credit rating and cost of debt resulting from imputed debt is uncertain due to many other factors; (2) the Company’s selection process does not similarly attempt to quantify comparable risks associated with Company-owned resources; (3) imputed debt is not a direct cost incurred by the Company and does not reflect rate-relevant cost differences between

bids; and (4) the estimated adder is not known and measurable for a comparison in a least-cost framework. *Id.* at 5–6. Staff further argued that inclusion of the adder would be a departure from the usual process, as other Idaho utilities do not include imputed debt cost adders in comparable RFP processes. *Id.* at 6.

Staff did not believe the 2032 RFP sufficiently explained to bidders bifurcated into two groups based on COD. *Id.* at 7–8. The Company confirmed through discovery there would be a first competitive group comprised of bids with a CODs on or before May 31, 2031, and a second competitive group comprised of bids with CODs on or before May 31, 2032. *Id.* at 8. Staff believed the Company’s RFP solicitation should provide a detailed explanation of the bifurcation process. *Id.* at 8. To ensure more costly bids from the 2032 group are not selected over runner-up bids from the 2031 group Staff also recommended unsuccessful bids from the 2031 group should automatically compete in the 2032 group. *Id.*

Staff noted that the 2032 RFP process proposal does not include Company retention of a third-party independent evaluator (“IE”) to independently analyze the bids and report its findings. *Id.* According to Staff, the Oregon Public Utility Commission (“OPUC”) has historically required the Company to hire an IE as part of RFP process. *Id.* Though the Solicitation Procedures reserve the Commission’s ability to require an IE and Staff recognized IE oversight is a beneficial practice, Staff was also wary of recommending the introduction of a requirement that would likely lead to delays in the RFP process. *Id.* at 9. As an alternative to an IE, Staff proposed assuming a similar, yet more limited oversight role. *Id.* The oversight proposed by Staff would include “reviews scheduled prior to key decision points in the process, requiring the Company to present proposals explaining its decision-making process, and for Staff to review the proposals based on the Company’s adherence to the Commission’s guidelines and orders and other factors that can affect prudent decisions.” *Id.* Unless directed by the Commission, Staff did not intend to produce a final comprehensive report as part of its proposed oversight role, though it stated it would document any anomalies for use during future prudence reviews. *Id.*

NIPPC COMMENTS

NIPPC expressed concern that the Company did not intend to seek OPUC’s approval of the 2032 RFP. NIPPC Comments at 1. This intent was contrary to NIPPC’s understanding at the time the Commission adopted the Solicitation Procedures. *Id.* According to NIPPC, several issues remained unresolved in the proceeding concerning the Solicitation Procedures based on the

expectation that the Commission could still leverage important requirements of neighboring states' RFP rules that would continue to apply. *Id.* at 3. NIPPC reiterated the position it expressed in Case No. GNR-E-25-01 that the Commission's Solicitation Procedures are not, on their own, sufficiently detailed to ensure fair competition in utility procurements. *Id.* at 5.

NIPPC contended the 2032 RFP differed significantly from the Company's 2026 and 2028 RFPs in a manner creating a bias favoring utility-owned resources. *Id.* at 2. To rectify the alleged utility-ownership favoritism, NIPPC recommended the Commission: (1) direct the Company to remove the imputed debt bid adder for third-party owned resources; (2) require retention of an IE employed by the Commission; (3) require the 2032 RFP use the same price/non-price scoring allocation as the Company's last RFP (75 percent price/25 percent non-price); (3) require benchmark bids submitted and scored before the submission of third-party bids; (4) direct the Company to accept and clarify the treatment of wind and solar bids qualifying for expiring tax credits if placed in service by the end of 2030; and (5) require the Company to rank bids irrespective of resource type. *Id.*

Like Staff, NIPPC believed the Commission should require the Company to remove the proposed imputed debt cost adder for independently owned resources. *Id.* at 6. NIPPC argued the imputed debt adder would increase affected bids by approximately 20 percent, creating a strong bias in favor of Company-owned resources. *Id.* NIPPC noted the proposed adder has been previously criticized by Staff and rejected by the OPUC. *Id.* According to NIPPC, the Company attempted to justify use of the adder as an appropriate measure designed to quantify the potential impact to its credit rating from a successful power purchase agreement ("PPA"), but it made no similar adjustments for risks from financing and operating its own generation resources. *Id.* at 7. NIPPC attached a report to its comments that was previously prepared by expert Michael P. Gorman of Brubaker and Associates, Inc., in the OPUC proceeding regarding the Company's 2026 RFP. *Id.* at 9. Mr. Gorman opined that in several ways a third-party PPA poses far less financial risk to utilities than utility-owned facilities, including cash flow constraints during a utility self-build project and asset risk in the event of generation output shortfalls, which could not be recouped from a utility-owned facility. *Id.* at 10. NIPPC contended that the imputed debt adder violated the Solicitation Procedures by creating unequal treatment of bids based on speculative factors. *Id.* at 7.

Given the Company's request for an expedited RFP process, NIPPC recommended that the Commission contract with the IE used in the Company's last two RFPs, London Economics International LLC ("LEI"). *Id.* at 12, 15. NIPPC proposed the IE would perform the same functions as in the previous two RFPs, except for a preliminary review and comment on the draft RFP, including a review of the Company's determination of bidder eligibility; scoring of bids; a review of the selection and ranking of shortlists; preparation of a report concerning the final shortlist; monitoring of negotiations; and preparation of a closing report. *Id.* at 15. According to NIPPC, IE oversight is critical to ensure fair treatment of independent bids when utility-owned resources are permitted in the solicitation. *Id.* at 12. NIPPC challenged the Company's assertion that an IE is unnecessary due to the RFP's similarity to prior solicitations, and further argued that, even if the Commission modifies the 2032 RFP to align with those earlier RFPs, considerations of fairness would still warrant the use of an IE. *Id.* at 13–14. NIPPC questioned whether Staff would have the resources to adequately perform the role of an IE in place of a qualified independent firm. *Id.* at 14–15.

NIPPC also believed the 2032 RFP should use the same 75 percent price score and 25 percent non-price score allocation that was used in the Company's 2026 and 2028 RFPs. *Id.* at 16. NIPPC contended the draft 2032 RFP replaced the prior, clearly defined scoring allocation with an opaque method that does not include a quantified value for the allocation and instead "is based on relative pricing ranking of resources within the same technology." *Id.*, note 33 (quoting the Company's Response to NIPPC's Interrogatory No. 15). According to NIPPC, the Company's proposed bid scoring methodology unreasonably hides score weighting in favor of subjective evaluation criteria. *Id.* at 17. NIPPC argued that the Solicitation Procedures require inclusion of scoring factors, which is consistent with the approach of neighboring states. *Id.* at 17–18.

Additionally, NIPPC recommended that the Commission require the Company to reinstate the requirement from the 2028 RFP that benchmark bids be submitted and scored before third-party bids are opened. *Id.* at 18. NIPPC stated that this is standard practice in solicitation processes designed to eliminate the opportunity for biased scoring and to encourage third-party participation. *Id.* NIPPC noted that the Company itself acknowledged the importance of requiring earlier submission of internal bids in the 2026 RFP proceeding before the OPUC. *Id.* at 19.

NIPPC believed the 2032 draft RFP contained ambiguity as to the treatment of wind and solar resources that would need to be placed in service by the end of 2030 to qualify for expiring

federal tax credits and recommended that the Commission require the Company to expressly accept such bids in a manner that would allow the affected facilities to achieve placed in service status during 2030. *Id.* at 19. NIPPC argued that capturing the expiring credits could provide benefit to the Company’s ratepayers. *Id.* at 21.

Finally, NIPPC recommended that the Commission direct the Company to rank bids without regard to resource type when developing the shortlist. *Id.* Though the practice of ranking bids against only bids of the same resource type was employed by the Company in the 2026 and 2028 RFPs, NIPPC believed this could favor bids with few other bids of the same resource type. *Id.* NIPPC also worried this approach could place undo reliance on potentially faulty or biased portfolio modeling assumptions. *Id.* at 22.

IIPA COMMENTS

IIPA stated that material changes to the Company’s proposed solicitation process creates a risk that the 2032 RFP will not select the least-cost, least-risk outcome. IIPA Comments at 1. IIPA recommended that the Commission approve the 2032 RFP subject to the following Commission-imposed conditions: (1) require the Company to illustrate the effects of the imputed debt adder with a side-by-side comparison of bids with and without the adder prior to approval of the final shortlist; (2) require an IE or Staff to contemporaneously audit bids with reporting obligations; and (3) instruct the Company to maintain data that allows capacity additions to be attributed to either Additional Firm Load (“AFL”) or existing customers. *Id.*

IIPA stated that the Company’s own data from the 2022 RFP demonstrated that the imputed debt cost adder increased bid costs by approximately 18 percent. *Id.* at 2. IIPA questioned the Company’s justification for the adder based on credit metrics and echoed the sentiment that utility-owned resources also introduce financial risk to ratepayers. *Id.* at 2–3. IIPA suggested that the Commission, Staff, and the Intervenors should have the opportunity review the effects of the adder through the use of parallel modeling with and without imputed debt. *Id.* at 3.

IIPA further contended that several proposed changes from previous RFPs necessitate Commission oversight, including the absence of an IE; the removal of a five-day period for bidders to correct bid defects; no independent review of wind and solar site-specific performance factors; and a requested waiver of the OPUC’s competitive bidding rules. *Id.* at 4. IIPA also highlighted the Company’s March 26, 2026 notice to the parties of unilaterally implemented changes to the solicitation process as evidence of the need for oversight. *Id.* According to IIPA, a concurrent Staff

audit with binding reporting requirements would “ensure that such changes are tracked, documented, and reviewed before they affect bid outcomes.” *Id.*

Though IIPA made no specific recommendations regarding the Company’s proposal that internal bids should be due on the same day as third-party bids, it agreed with NIPPC’s concerns about the elimination of the benchmark bid pre-scoring requirement. *Id.* at 5. IIPA argued that without such pre-scoring, the Commission would not be able to determine that benchmark bids were assessed without regard to third-party bids. *Id.*

Lastly, IIPA sought to preserve a record to support the Commission’s analysis in the Company’s pending dedicated customer cost of service filing.¹ *Id.* at 6. IIPA stated that in this docket, the Commission should require the Company to maintain modeling outputs developed for the RFP process that would allow for evaluation of capacity drivers. *Id.*

PUBLIC COMMENTS

One public comment from Tyler Grange of Idahome Energy questioned why the Company intended to address capacity shortfalls with large-scale procurement only without encouraging distributed generation in the form of rooftop solar paired with battery storage. Grange Comments at 1. Mr. Grange recommended the Commission re-evaluate distributed energy incentives to supplement the Company’s resource procurement efforts. *Id.*

The other public comment was submitted by Renewable Northwest (“RNW”). RNW made several recommendations that were generally consistent with those made by the Intervenors and Staff. Specifically, RNW believed that the Company and/or Commission should make the following changes to the 2032 RFP: (1) expressly allow for bids with a COD prior to 2031 that would qualify for expiring federal tax credits; (2) utilize an IE; (3) remove the proposed imputed debt adder; (4) remove or further clarify the subjective term “commercially proven technology” as a minimum bid criterion, so as not to preclude emerging technologies like iron-air battery storage and enhanced geothermal, or alternatively, move the item to a non-price scoring factor; and (5) remove or modify matching COD and interconnection timeline as a minimum bid criterion to avoid excluding competitive bids based on an uncertain interconnection queue, or alternatively, move the item to a non-price scoring factor. *Id.* at 2–3, 9–10.

¹ In Order No. 36892, the Commission instructed the Company to “initiate a single-issue case addressing the [customer cost of service] methodology for the Commission’s consideration no later than the end of the first quarter of 2026.” As instructed, the Company filed Case No. IPC-E-26-07 to evaluate its class cost of service methodology on March 31, 2026.

STAFF CROSS-REPLY COMMENTS

Staff stated it had no objections to the recommendations made by NIPPC, IIPA, and RNW, with three exceptions: (1) NIPPC's recommendation that the RFP rank bids irrespective of resource type; (2) NIPPC's recommendation that the Commission directly hire an IE; and (3) IIPA's recommendation that the Commission implement binding Staff reporting requirements if it directs Staff to audit bids. Staff Cross-Reply Comments at 2.

Staff believed the Commission should allow the RFP selection process to rank bids by resource type. *Id.* at 4. Staff noted that the parties would not have sufficient opportunity to review the details of NIPPC's proposal to adopt a pre-determined method of adjusting the price of each resource type to normalize for different resource characteristics. *Id.* at 3. Staff also contended NIPPC's recommendation would not alleviate its concerns regarding portfolio modeling transparency, as the shortlist projects would still be subject to such modeling, even if ranked without regard to resource type. *Id.* Furthermore, Staff believed the Aurora modeling utilized by the Company is thoroughly scrutinized during the Company's Integrated Resource Plan filings. *Id.*

Regarding NIPPC's recommendation that the Commission contract directly with an IE, Staff worried Idaho's purchasing rules regarding competitive bidding could add undue delay to the RFP timeline. *Id.* at 4. Accordingly, should the Commission decide an IE is necessary, Staff recommended that the Company contract with the IE used in prior RFPs. *Id.*

Staff did not believe it had the ability to conduct real-time audits and adhere to the binding reporting obligations recommended by IIPA under the Company's proposed RFP schedule. *Id.* Staff reiterated its recommendation that the Commission should not impose reporting requirements if it directs Staff to perform RFP oversight. *Id.*

CITY CROSS-REPLY COMMENTS

The City emphasized the need for the Commission to protect ratepayers by recognizing and accounting for the Company's incentive to select its own resources. City Comments at 1–2. The City supported the recommendations regarding (1) the oversight of an IE; (2) removal of the Company's proposed imputed debt adder; (3) defining price/non-price scoring allocation; (4) requiring benchmark bids; (5) allow for the capture of expiring tax credits; (6) removal of technology-based bid ranking; and (7) encouraging distributed generation and demand-side management. *Id.* at 2. The Company additionally recommended the selection criteria reflect risks of fuel price fluctuations for fossil fueled assets and adequately model climate change impacts. *Id.*

COMPANY REPLY COMMENTS

To address some of the recommendations made in comments, the Company attached proposed revisions to specific sections or exhibits of the 2032 RFP to its comments. Company Reply Comments at 3. The Company also submitted rebuttals addressing recommendations it believed did not warrant changes to the RFP process.

In response to feedback regarding the IE oversight, the Company proposed engaging LEI to perform most of the same functions it did in the 2026 and 2028 RFPs (including bid scoring, validating benchmark bid assumptions and calculations, and producing a final report) except for interim reporting. *Id.* at 6. The Company believed it could maintain the proposed timeline by limiting LEI's reporting to a single final report. *Id.* According to the Company, a single final report would provide the full benefit of independent review. *Id.* Additionally, the Company supported Staff's proposed contemporaneous review of bid selection and negotiation. *Id.* at 7.

Responding to recommendations of disallowing the proposed imputed debt cost adder for third-party bids, the Company argued that discounting the real and measurable costs of imputed debt would be contrary to the task of identifying least-cost resources. *Id.* at 9. The Company stated that comparable costs for internal resources, such as construction financing costs, Allowance for Funds Used During Construction, and the Company's return component are included in the levelized cost of the projects. *Id.* The Company explained that credit rating agencies consider future debt and debt-like obligations, such as long-term PPAs and similar agreements, ultimately affecting the interest rates a utility pays for indebtedness and its cost of equity. *Id.* at 10. According to the Company, Staff, Intervenor, and public comments criticizing the imputed debt cost adder rely on dated sources that ignore the recent emphasis rating agencies have placed on third-party agreements. *Id.* at 10–11. The Company represented that as of 2025, it is now required to impute debt from contracts resulting in capital finance lease accounting directly onto its balance sheet. *Id.* at 11. The Company further argued that PPA obligations, at a minimum, qualitatively harm utility credit ratings, though it acknowledged such effects are "less measurable" than capital finance lease liabilities. *Id.* at 11–12. While the Company had proposed to include an imputed debt factor of 50 percent for all third-party bids, in response to feedback, it reduced the imputed debt factor to 25 percent and sought to apply the factor only to bids that would result in capital finance lease accounting. *Id.* at 12–13.

The Company responded to feedback regarding the treatment of bids based on COD by stating that it intended to apply the same process as it did for the 2026 RFP, when it prioritized the group with the earlier COD. *Id.* at 15. The Company stated that under its proposal, the final shortlist could include bids with a COD of either 2031 or 2032. *Id.* Based on Staff’s recommendation, the Company added language to the draft RFP to clarify that unsuccessful 2031 bids would be considered to address any remaining 2032 capacity deficiency. *Id.*

Additionally, in response to concerns about expiring tax credits for solar and wind resources placed in service prior to 2031, the Company proposed to clarify that it will accept all bids proposing delivery prior to May 31, 2032. *Id.* at 15–16. The Company explained its preference to align delivery into a single calendar quarter for each year for Federal Energy Regulatory Commission compliance reporting purposes, but it stated that it would evaluate all bids, including those with earlier delivery dates, based on the methodology described in the 2032 RFP. *Id.* at 16.

The Company disagreed with NIPPC’s contentions regarding a lack of transparency resulting from the absence of fixed numerical weighting for price and non-price factors. *Id.* at 18. The Company argued that its proposal included a clear description of how it would use a comparison of relative cost and objective non-price factors to develop the initial shortlist. *Id.* According to the Company, “[t]he purpose of the initial shortlist is not to select projects or determine outcomes, but to narrow the field to a set of reasonably priced, realistically deliverable projects suitable for detailed portfolio analysis, and the Company’s proposed method will achieve that result.” *Id.*

The Company challenged concerns expressed by NIPPC, IIPA, and the City about the Company’s ability to modify benchmark bids after the submission of third-party bids without a requirement for earlier submission and scoring of benchmark bids. *Id.* at 20. The Company argued that all bids will be evaluated under the same methodology and that the proposed IE would adequately address any concerns about the Company improperly adjusting benchmark bids. *Id.*

The Company also disputed NIPPC’s recommendation that the 2032 RFP should rank bids without regard to resource type for initial screening purposes. *Id.* at 21. The Company reasoned that different resource categories have differing cost structures, operating characteristics, and risks that cannot be meaningfully compared in isolation, outside the context of portfolio modeling. *Id.* The Company also reiterated Staff’s assertion that technology-neutral ranking for initial screening would not reduce later reliance on portfolio modeling. *Id.* at 22.

In response to RNW’s recommendations concerning minimum bid criteria, the Company proposed changes to the RFP that would provide clarification. *Id.* at 23. The Company revised “commercially proven technology” to “commercially available technology,” and it proposed changing the requirement that generator interconnect status “matches” the COD submitted to a requirement that the generator interconnect status “supports” the COD submitted. *Id.*

Regarding the Company’s March 26, 2026, notice concerning the requirements for projects seeking to interconnect to the Company’s system, the Company stated that IIPA misunderstood the nature of the notice in claiming the Company had unilaterally changed the RFP. *Id.* at 23–24. Rather, the Company had submitted notice of a proposed change for the parties to review and comment. *Id.* at 24. As no parties objected to the proposed changes, the Company asked for Commission approval. *Id.*

The Company believed IIPA’s recommendation that the Commission instruct the Company to maintain disaggregated modeling data that allows capacity additions to be attributed to either AFL or existing customers was unreasonable. *Id.* at 25. According to the Company, the request would effectively require two separate bid evaluations. *Id.* at 26. The Company contended it would be unnecessary to require multiple analyses with and without certain segments of customers for a process designed to meet overall system capacity deficiencies. *Id.*

In response to the public comment recommending redesigned incentives for distributed generation to help meet capacity needs, the Company stated that it “already accounts for customer on-site generation resources in its load forecasting and planning processes, and any incremental contribution from such resources is reflected in the Company’s assessment of system needs.” *Id.* at 27.

COMMISSION FINDINGS AND DECISION

The Commission has jurisdiction over this matter under *Idaho Code* §§ 61-501, 61-502, and 61-503. The Commission is vested with the power to “supervise and regulate every public utility in the state and to do all things necessary to carry out the spirit and intent of the [Public Utilities Law].” *Idaho Code* § 61-501. The Commission is empowered to investigate rates, charges, rules, regulations, practices, and contracts of public utilities and to determine whether they are just, reasonable, preferential, discriminatory, or in violation of any provision of law, and to fix the same by order. *Idaho Code* §§ 61-502 and 61-503.

Having reviewed the record and all submitted comments, the Commission finds it fair, just, and reasonable to approve the Company's 2032 RFP with the following modifications: (1) the RFP shall not include an imputed debt cost adder for third-party resource bids; (2) the RFP shall include the language proposed in the Company's reply comments clarifying the treatment of bids COD; (3) the Company will engage LEI to serve as a IE, performing bid scoring, validating benchmark bid assumptions and calculations, and producing a final report; (4) the Company will accommodate a contemporaneous Staff review of the selection and negotiation process; (5) the RFP shall include the language proposed in the Company's reply comments changing the minimum bid criterion from "commercially proven technology" to "commercially available technology"; (6) the RFP shall include the language proposed in the Company's reply comments changing the minimum bid criterion from a requirement that the generator interconnect status "matches" the COD submitted to a requirement that the generator interconnect status "supports" the COD submitted; and (7) the RFP shall include the Company's proposed revisions that would relax the requirements for projects seeking to interconnect to the Company's system, as submitted in the March 26, 2026, notice.

While the Commission understands the Company's desire to account for costs of imputed debt, without further justification, we cannot support imposing a criterion that would likely limit the range of submitted bids at a time when the Company is facing impending capacity deficiencies and "expects sustained load growth." Application at 3. Before the Commission would allow a factor like an imputed debt cost adder for third-party bids in future RFPs, (even if the adder was applied to only projects that would result in capital finance lease accounting), the Company would need to demonstrate that recovery for imputed debt cannot be sufficiently addressed through a revenue requirement determination in a rate case. This docket, which was truncated at the Company's request (spanning just over two months from the Company's filing of the Application to the Commission's issuing of this Final Order), does not allow for the appropriate level of record development or scrutiny prior to instituting such an impactful revision to the bid scoring process.

The Company sufficiently addressed concerns regarding the treatment of bids based on COD with the proposed language submitted in its reply comments. By stating that it would accept all bids proposing delivery prior to May 31, 2032, and that it will separate and prioritize bids that can meet 2031 needs with bids that are not selected for the 2031 final shortlist automatically considered to meet 2032 needs, the Company clarified the impact project COD will have on bid consideration, including bids needing to meet deadlines to apply for expiring tax credits.

The Commission finds that the Company's proposal to engage LEI to perform bid scoring, to validate benchmark bid assumptions and calculations, and to produce a final report (without interim reporting requirements) is the most effective means of providing independent oversight to the RFP process without compromising the proposed timeline. Additionally, the Company must accommodate a contemporaneous Staff review of the selection and negotiation process (without Staff reporting requirements).

We conclude that the participation of LEI as an IE supports our decision to decline implementing additional safeguards proposed in the written submissions. Specifically, the Commission will not dictate a numerical value for use in the price/non-price scoring allocation. We will also not require benchmark bids submitted and scored prior to the submission of third-party bids, as we believe blind bids submitted by the same deadline provides a fair process to all bidders. Furthermore, we will not require the Company to rank bids irrespective of resource type during the initial screening process, as doing so would essentially burden the Company with performing bid-specific portfolio modeling prior to developing an initial shortlist.

Though the Commission appreciates and understands IIPA's interest in and attention to cost causation, we find the Company's objection to maintaining disaggregated modeling data that allows capacity additions to be attributed to either AFL or existing customers compelling. The RFP process is designed to facilitate utility procurement of least-cost, least-risk resources to address identified system-wide capacity needs, rather than to assign responsibility for those needs to specific customer classes. Imposing IIPA's requested requirements would burden the Company with additional evaluations outside the scope of the RFP process. As noted by both IIPA and the Company, Case No. IPC-E-26-07 is specifically designated for the evaluation of the Company's class cost-of-service methodology. The Commission encourages IIPA to utilize its rights as a party to that proceeding to address its cost allocation concerns.

Finally, we accept the Company's proposed revisions to the minimum bid criteria submitted along with its reply comments and the proposed revisions submitted in its March 26, 2026, notice. Changing the minimum bid criterion from "commercially proven technology" to "commercially available technology" sufficiently limits subjectivity and allows for bids from projects reliant on emerging technology that can achieve a COD required by the RFP. Changing the minimum bid criterion from a requirement that the generator interconnect status "matches" the COD submitted to a requirement that the generator interconnect status "supports" the COD submitted minimizes

concerns that competitive bids could be excluded based on an uncertain interconnection queue. Relatedly, the Company's proposed revisions stating that projects must have submitted a generator interconnect request and removing references to "Network Integration Interconnection Service" appropriately relaxes the requirements for projects seeking to interconnect to the Company's system.


ORDER

IT IS HEREBY ORDERED that the Company's 2032 RFP is approved as described above.

IT IS FURTHER ORDERED that the Company shall file an executed copy of its contract with LEI, once available, as a compliance filing.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within 21 days of the service date of this Order regarding any matter decided in this Order. Within seven days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *Idaho Code* § 61-626.


DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 27th day of April 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary