

RECEIVED

2020 JUL 17 PM 1:01

IDAHO PUBLIC UTILITIES COMMISSION

EDWARD JEWELL
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0314
IDAHO BAR NO. 10446

Street Address for Express Mail:
11331 W CHINDEN BVLD, BLDG 8, SUITE 201-A
BOISE, ID 83714

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE ANNUAL)	
REVISION TO QF VARIABLE ENERGY)	CASE NO. PAC-E-20-08
PRICES PURSUANT TO TERMS OF THE)	
1992 AMENDMENTS TO POWER)	COMMENTS OF THE
PURCHASE AGREEMENTS BETWEEN)	COMMISSION STAFF
<u>IDAHO QFS AND PACIFICORP</u>)	

STAFF OF the Idaho Public Utilities Commission, by and through its Attorney of record, Edward Jewell, Deputy Attorney General, submits the following comments.

BACKGROUND

On June 4, 2020, Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”) filed an Application requesting the Commission approve the annual update to the variable energy portion of avoided cost rates for qualifying facilities (“QFs”) under the Public Utility Regulatory Policies Act of 1978 (“PURPA”) with the 1992 amendments. The variable component of the rate was ordered by the Commission to be updated annually in Order No. 29316 for contracts authorized under this methodology. The Company requests an effective date of July 1, 2020.

STAFF ANALYSIS


Staff reviewed the variable energy rate of the avoided cost rate for PacifiCorp contracts with 1992 amendments contained in the Application and believes that the proposed rate is correct and complies with Order No. 29316. The 1992 amendments apply to 13 QFs.

This year's proposed update was calculated by summing the average of Rocky Mountain Power's fuel costs for its Naughton, Huntington, and Hunter coal-fired generation plants with the variable operations and maintenance costs for Colstrip. Carbon and Hale coal plants are no longer in operation and were properly excluded from the calculation of the average cost of fuel. The average cost of fuel was calculated using the data reported in the Company's FERC Form 1. The result in the variable energy rate of \$23.07 per megawatt hour ("MWh") is a decrease from the currently authorized rate of \$23.85 per MWh.

STAFF RECOMMENDATION

Staff recommends that the Commission approve the variable energy rate of \$23.07 per MWh applicable to the energy delivered from the 1992 QF contracts commencing July 1, 2020, extending through June 30, 2021.

Respectfully submitted this 17th day of July 2020.



Edward Jewell
Deputy Attorney General

Technical Staff: Yao Yin
Rachelle Farnsworth
Travis Culbertson

i:umisc/comments/pace20.8ejrfytn comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 17th DAY OF JUNE 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-20-08, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

TED WESTON
ID REG AFFAIRS MGR
ROCKY MOUNTAIN POWER
1407 WN TEMPLE STE 330
SALT LAKE CITY UT 84116
E-mail: ted.weston@pacificorp.com

EMILY WEGENER
ROCKY MOUNTAIN POWER
1407 WN TEMPLE STE 320
SALT LAKE CITY UT 84116
E-mail: emily.wegener@pacificorp.com

DATA REQUEST RESPONSE CENTER
E-MAIL ONLY:
datarequest@pacificorp.com

Reyna Quintero

SECRETARY