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IDAHO PUBLIC  
UTILITIES COMMISSION

1407 W. North Temple, Suite 330  
Salt Lake City, Utah 84116

February 24, 2021

***ELECTRONIC DELIVERY***

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

**RE: CASE NO. PAC-E-20-14  
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR  
AUTHORIZATION TO UPDATE THE WIND AND SOLAR INTEGRATION RATE  
FOR SMALL POWER GENERATION QUALIFYING FACILITIES**

Attention: Jan Noriyuki  
Commission Secretary

Please find for filing Rocky Mountain Power's reply comments in the above-referenced matter and Attachment A.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

Joelle Steward  
Vice President, Regulation

Emily Wegener  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4526

Attorney for Rocky Mountain Power

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION )  
OF ROCKY MOUNTAIN POWER FOR )  
AUTHORIZATION TO UPDATE THE WIND )  
AND SOLAR INTEGRATION RATE FOR )  
SMALL POWER GENERATION )  
QUALIFYING FACILITIES )**

**CASE NO. PAC-E-20-14**

**REPLY COMMENTS**

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Comes now Rocky Mountain Power, a division of PacifiCorp (“the Company”), in response to the Notice of Modified Procedure issued in Order No. 34888 on January 12, 2021 and submits the following reply comments.

**I. BACKGROUND**

1. On October 8, 2020, the Company filed Application with the Idaho Public Utilities Commission (“Commission”) requesting authority to increase the wind and solar integration rates applicable for new power purchase agreements (“PPAs”) between the Company and wind and solar qualifying facilities (“QFs”).

2. The Company requested authorization to increase the integration costs for new wind PPAs from \$0.57 to \$1.11 per megawatt-hour (“MWh”) and the integration costs for new solar PPAs from \$0.60 to \$0.85 per MWh, based on the Surrogate Avoided Resource calculation method.

3. On February 12, 2021, Commission Staff filed comments summarizing their review of the Company’s application. During staff’s review they identified an error in the calculation of

the wind integration rate. This error understated the wind integration rate by approximately one percent.

4. Staff recommended that the Commission approve the solar integration rates as shown in Attachment A and that the Company should file updated wind integration rates so the Commission could approve the corrected wind integration rates.

5. Staff also supported the changes to the methodology proposed by the Company noting: “By changing the method, the Company can reflect a truer picture of how integration rates will change as the amount of wind and solar are added to the system and as the amount of regulating reserve resources are added or retired from the system.”

6. The Company appreciates Staff’s review of the Application and support of the improvements to the method used to calculate these integration costs. The Company expects to continue to refine integration cost calculations in future Integrated Resource Plans.

7. The Company has corrected the formula error identified by staff. Provided as Attachment A with these comments are the corrected integration rates. Table F.2 has also been updated with the corrected wind integration rate.

**Table F.2 - 2019 FRS Flexible Resource Costs as Compared to 2017 Costs, \$/MWh**

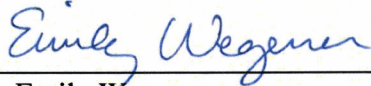
	<b>Wind 2017 FRS (2016\$)</b>	<b>Solar 2017 FRS (2016\$)</b>	<b>Wind 2019 FRS (2018\$)</b>	<b>Solar 2019 FRS (2018\$)</b>
<b>Study Period</b>	2017	2017	2018-2036	2018-2036
<b>Intra-hour Reserve</b>	\$0.43	\$0.46	\$1.12	\$0.85
<b>Inter-hour System Balancing</b>	\$0.14	\$0.14	n/a	n/a
<b>Flexible Resource Cost</b>	\$0.57	\$0.60	\$1.12	\$0.85

**REQUEST FOR RELIEF**

WHEREFORE, with tis correction to the wind integration rate Rocky Mountain Power respectfully requests that the Commission issue an Order approving the wind integration rate of \$1.12 per MWh for wind powered QFs and the solar integration rate of \$0.85 per MWh.

RESPECTFULLY SUBMITTED this 24<sup>th</sup> day of February, 2021.

Rocky Mountain Power

By:   
\_\_\_\_\_  
Emily Wegener  
Rocky Mountain Power

## **Attachment A**

**Table 1. Wind Integration Charges**

7.98% SAR Approved PCP WACC

Year	Non-Levelized Rates \$/MWh	Levelized Rates Contract Length	Online Year					
			2021	2022	2023	2024	2025	2026
2021	0.19	1	\$0.19	\$0.27	\$0.29	\$0.36	\$0.62	\$0.45
2022	0.27	2	\$0.23	\$0.28	\$0.32	\$0.48	\$0.54	\$0.57
2023	0.29	3	\$0.25	\$0.30	\$0.41	\$0.47	\$0.59	\$0.69
2024	0.36	4	\$0.27	\$0.37	\$0.42	\$0.52	\$0.67	\$0.82
2025	0.62	5	\$0.33	\$0.39	\$0.47	\$0.60	\$0.78	\$0.96
2026	0.45	6	\$0.35	\$0.43	\$0.54	\$0.69	\$0.89	\$1.05
2027	0.70	7	\$0.39	\$0.49	\$0.62	\$0.80	\$0.98	\$1.13
2028	0.94	8	\$0.44	\$0.56	\$0.72	\$0.88	\$1.05	\$1.20
2029	1.31	9	\$0.51	\$0.65	\$0.79	\$0.95	\$1.11	\$1.24
2030	1.63	10	\$0.59	\$0.72	\$0.86	\$1.01	\$1.16	\$1.28
2031	1.65	11	\$0.65	\$0.78	\$0.92	\$1.05	\$1.19	\$1.30
2032	1.77	12	\$0.71	\$0.84	\$0.96	\$1.09	\$1.21	\$1.32
2033	1.81	13	\$0.76	\$0.88	\$1.00	\$1.11	\$1.23	\$1.33
2034	1.77	14	\$0.80	\$0.92	\$1.02	\$1.14	\$1.25	\$1.35
2035	1.74	15	\$0.84	\$0.94	\$1.04	\$1.15	\$1.27	\$1.36
2036	1.60	16	\$0.86	\$0.96	\$1.06	\$1.17	\$1.28	\$1.38
2037	1.63	17	\$0.89	\$0.98	\$1.08	\$1.19	\$1.30	\$1.39
2038	1.67	18	\$0.91	\$1.00	\$1.10	\$1.21	\$1.31	\$1.40
2039	1.71	19	\$0.93	\$1.02	\$1.12	\$1.22	\$1.33	\$1.41
2040	1.75	20	\$0.94	\$1.04	\$1.13	\$1.24	\$1.34	\$1.43
2041	1.79	21						
2042	1.83	22						
2043	1.87	23						
2044	1.91	24						
2045	1.96	25						

**Table 2. Solar Integration Charges**

7.98% SAR Approved PCP WACC

Year	Non-Levelized Rates \$/MWh	Levelized Rates Contract Length	Online Year					
			2021	2022	2023	2024	2025	2026
2021	0.15	1	\$0.15	\$0.22	\$0.24	\$0.29	\$0.50	\$0.37
2022	0.22	2	\$0.18	\$0.23	\$0.26	\$0.39	\$0.43	\$0.46
2023	0.24	3	\$0.20	\$0.24	\$0.33	\$0.38	\$0.47	\$0.55
2024	0.29	4	\$0.22	\$0.30	\$0.34	\$0.42	\$0.54	\$0.66
2025	0.50	5	\$0.27	\$0.31	\$0.38	\$0.48	\$0.62	\$0.77
2026	0.37	6	\$0.28	\$0.35	\$0.43	\$0.56	\$0.72	\$0.85
2027	0.56	7	\$0.31	\$0.39	\$0.50	\$0.64	\$0.79	\$0.91
2028	0.76	8	\$0.35	\$0.45	\$0.58	\$0.71	\$0.85	\$0.96
2029	1.05	9	\$0.41	\$0.52	\$0.64	\$0.76	\$0.89	\$1.00
2030	1.31	10	\$0.47	\$0.58	\$0.69	\$0.81	\$0.93	\$1.03
2031	1.32	11	\$0.52	\$0.63	\$0.74	\$0.85	\$0.96	\$1.04
2032	1.42	12	\$0.57	\$0.67	\$0.77	\$0.88	\$0.98	\$1.06
2033	1.45	13	\$0.61	\$0.71	\$0.80	\$0.90	\$0.99	\$1.07
2034	1.42	14	\$0.65	\$0.74	\$0.82	\$0.91	\$1.01	\$1.08
2035	1.40	15	\$0.67	\$0.76	\$0.84	\$0.93	\$1.02	\$1.10
2036	1.28	16	\$0.69	\$0.77	\$0.86	\$0.94	\$1.03	\$1.11
2037	1.31	17	\$0.71	\$0.79	\$0.87	\$0.96	\$1.04	\$1.12
2038	1.34	18	\$0.73	\$0.81	\$0.89	\$0.97	\$1.06	\$1.13
2039	1.37	19	\$0.74	\$0.82	\$0.90	\$0.98	\$1.07	\$1.14
2040	1.41	20	\$0.76	\$0.83	\$0.91	\$0.99	\$1.08	\$1.15
2041	1.44	21						
2042	1.47	22						
2043	1.50	23						
2044	1.54	24						
2045	1.57	25						

## CERTIFICATE OF SERVICE

I hereby certify that on this 24<sup>th</sup> of February, 2021, I caused to be served, via electronic mail delivery a true and correct copy of Rocky Mountain Power's Reply Comments in Case No. PAC-E-20-14 to the following:

### Service List

<b>Rocky Mountain Power</b>	
Ted Weston PacifiCorp/ dba Rocky Mountain Power 1407 West North Temple Suite 330 Salt Lake City, UT 84116 <a href="mailto:ted.weston@pacificorp.com">ted.weston@pacificorp.com</a>	Emily Wegener PacifiCorp/ dba Rocky Mountain Power 1407 West North Temple Suite 320 Salt Lake City, UT 84116 <a href="mailto:emily.wegener@pacificorp.com">emily.wegener@pacificorp.com</a>
Data Request Response Center PacifiCorp <a href="mailto:datarequest@pacificorp.com">datarequest@pacificorp.com</a>	
<b>Commission Staff</b>	
John R. Hammond Jr. Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg No. 8, Suite 201-A (83714) PO Box 83720 Boise, ID 83720-0074 <a href="mailto:john.hammond@puc.idaho.gov">john.hammond@puc.idaho.gov</a>	

Dated this 24<sup>th</sup> day of February, 2021.



Katie Savarin  
Coordinator, Regulatory Operations