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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY
MOUNTAIN POWER'S 2021
INTEGRATED RESOURCE PLAN

)
) CASE NO. PAC-E-21-03
)
) COMMENTS OF THE
) COMMISSION STAFF
)

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 February 12, 2021, Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or "Company") petitioned the Commission to extend the filing date for its 2021 Integrated Resource Plan ("IRP") from March 31, 2021, to no later than September 1, 2021.

The Company stated it has held 12 public-input meetings on its 2021 IRP in which it has discussed topics such as resource cost-and-performance assumptions, model function and overview, load forecast, price-policy assumptions, market price assumptions, and transmission options considered as part of the 2021 IRP.

The Company has been working since the summer of 2020 to implement new modeling software for the 2021 IRP but as of the time of filing its Petition, it has not successfully completed any model runs to establish resource portfolios and evaluate costs and risks.

The Company also stated it is currently conducting its 2020 All Source Request for Proposals (“2020AS RFP”) and will have a final shortlist by June 1, 2021. The proposed IRP extension would allow the results of the 2020AS RFP to be incorporated in the 2021 IRP.

STAFF ANALYSIS

Staff evaluated aspects of the Company’s filing and determined that permitting an extension to the IRP deadline would allow the Company time to resolve issues with new power system modeling software and include the 2020AS RFP. Staff believes there will be limited impact to upcoming filings that utilize results of the IRP, but Staff recommends that if the *Load and Gas Forecast Update* will be delayed past its October 15, 2021 filing deadline or if the IRP will be further delayed, that the Company notify the Commission as soon as it is known. Staff recommends that the Commission grant the Company’s requested 5-month extension for filing the 2021 IRP.

Forecast Modeling

Staff supports the thorough development and analysis of a least-cost, least-risk integrated resource plan which further extends analysis to support the Multi-State Protocol (“MSP”). In the February 10, 2021 IRP public-input meeting, the Company disclosed it was continuing to “address modeling functionality and performance issues associated with implementation of new and advanced modeling software,” and that they were behind in performing model runs that would establish resource portfolios needed for cost and risk analysis. Staff believes it is appropriate to permit the IRP extension to allow the Company time to resolve issues with the new software.

Request for Proposals

During the IRP delay, Staff finds it reasonable for the Company to include results from the 2020AS RFP while also making necessary adjustments to optimize modeling functionality and for updating input parameters used by the model.

Related IRP Cases

Considering the proposed five-month IRP filing delay, Staff believes there would be minimal impact to the load and gas forecast update case that is used to develop the IRP avoided cost

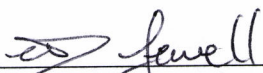
model. In the Company's prior case, PAC-E-19-01 which was submitted to extend the 2019 IRP filing,¹ the Company was able to file the *Load and Gas Forecast Update* within 23 days of the regular October 15th filing date.²

Staff recognizes that the IRP delay will lead to a delayed update of the *First Capacity Deficiency Date* used for avoided cost pricing under both the Surrogate Avoided Resource Method and the IRP Method because the *First Capacity Deficiency Date* case is filed after the acknowledgement of each IRP. See Order Nos. 33917 and 34649. This will result in using the currently approved First Capacity Deficiency Date for a longer period.

STAFF RECOMMENDATIONS

Staff recommends the Commission grant a 5-month extension for filing the 2021 IRP from March 31, 2021 to September 1, 2021 and that the Company inform the Commission, if the *Load and Gas Forecast Update* will be delayed past its October 15, 2021 filing deadline or if the IRP filing will be further delayed as soon as it is known.

Respectfully submitted this 18th day of March 2021.



Edward Jewell
Deputy Attorney General

Technical Staff: Rachelle Farnsworth
Richard Keller

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¹ In the case to extend the 2019 IRP filing, the Company filed the IRP on October 18, 2019. Case No. PAC-E-19-01.

² Case No. PAC-E-19-18.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 18TH DAY OF MARCH 2021, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-21-03, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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