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**UTILITIES COMMISSION**

July 12, 2023

***VIA ELECTRONIC FILING***

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

**RE: CASE NO. PAC-E-22-14  
IN THE MATTER OF ROCKY MOUNTAIN POWER'S APPLICATION FOR  
APPROVAL OF A CAPACITY DEFICIENCY PERIOD TO BE USED FOR AVOIDED  
COST CALCULATIONS**

On June 29, 2023, the Idaho Public Utilities Commission ("Commission") issued Order No. 35834 in the above referenced case directing Rocky Mountain Power, a division of PacifiCorp ("the Company"), to make a compliance filing to address several of the matters arising from Commission Staff's comments ("Staff"). The following are the items raised by Staff in their comments:

1. Use the capacity deficiency period . . . to determine when capacity payments begin for both IRP-based and SAR-based contracts;
2. Provide the load and resource balance ("L&R") using the 20-year IRP planning horizon, instead of the 9-year timeframe submitted with the Company's filing;
3. Provide the L&R reflecting both summer and winter peaks;
4. Use the 2021 IRP method, instead of the 2021 IRP Update method, to determine capacity contributions of all resources;
5. Assume renewal of PURPA projects located in the State of Idaho, unless the Company has information from specific QFs to the contrary;
6. Update the L&R to include all contracts executed by the date of the Commission order that are eligible for rate recovery;
7. Include the additional 3% contingency reserves above the Front Office Transaction ("FOTs") limit only if it increases the amount of available FOTs that the Company can rely on to meet its load obligations;
8. Include projected growth in existing Demand Response ("DR") programs;
9. Only include DR programs from the 2021 Request for Proposals ("RFP"), that are approved programs in the L&R;
10. Include existing DR programs and approved new DR programs consistently in the L&R such that they are both treated either as a decrement to load or as a resource; and

11. Verify the value of the existing Energy Efficiency (“EE”) in the load forecast, ensuring 68 MW is used.

The Commission found in Order No. 35834 that items 10 and 11 listed above were satisfied in the Company’s reply to Staff comments. For item 7, the Company is to provide clear evidence in its next filing that the that the Company can reliably count on the additional 3 percent contingency reserves above the Front Office Transactions (“FOT”) limit to provide contingency reserves. The Commission found that the remainder of the items raised by staff be addressed in a compliance filing within 21 days of the order.

On June 8, 2023, the Idaho Public Utilities Commission (“Commission”) issued Order No. 35810 directing the utilities, including the Company, to “file its capacity deficiency case within thirty (30) days of filing its respective IRP.”<sup>1</sup> On March 31, 2023, the Company filed its 2023 integrated resource plan (“2023 IRP”). The Company plans to submit its capacity deficiency filing for the 2023 IRP after the 2023 IRP is acknowledged in accordance with Order Nos. 32697 and 32802 in Case No. GNR-E-11-03, since Order No. 35810 was issued more than 30 days after the filing of the 2023 IRP.

The Company respectfully requests a waiver of the compliance filing requirement as outlined in Order No. 35834. The waiver would provide the Company with an opportunity to address the compliance filing items in its application for the 2023 deficit date, subsequent to the acknowledgement of the 2023 IRP. It is important to note that this waiver does not release the Company from its obligations to address the issues raised by the order. However, it would reduce duplicate work for both the Company and Staff, as the items in the compliance filing would not impact the deficiency date associated with the 2021 IRP.

In further support of the Company’s waiver request, with regard to item 3, the Company notes that it provided the L&R for both summer and winter peak in an attachment provided in response to Staff data request 1. The associated winter peak results are provided in Tables 1W and 2W below. With regard to item 2, the Company’s forecasted system shortfall in the summer in year nine is expected to continue to grow through the end of the twenty-year IRP forecast; however, the value in year nine already exceeds the Company’s peak Idaho load, and modification to the QF purchase obligation would be necessary well before the year nine capacity shortfall level was reached.

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<sup>1</sup> See *In the Matter of Commission Staff’s Application to Alter the Filing Date of the Capacity Deficiency Case*. Case No. GNR-E-23-01

**Table No. 1W**  
**2021 IRP Update - Winter Peak Loads and Resources without Additions**

Calendar Year	2023	2024	2025	2026	2027	2028	2029	2030	2031
<b>System</b>									
Total Resources	9,061	8,651	8,730	7,899	7,900	7,358	7,386	7,142	6,809
Obligation	8,672	8,644	8,703	8,663	8,662	8,703	8,939	8,989	9,033
Planning Reserves (13%)	1,127	1,124	1,131	1,126	1,126	1,131	1,162	1,169	1,174
Obligation + Reserves	9,800	9,767	9,834	9,789	9,788	9,835	10,101	10,157	10,207
System Position	(739)	(1,117)	(1,104)	(1,890)	(1,889)	(2,477)	(2,716)	(3,016)	(3,398)
Available FOTs	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030
Net Surplus/(Deficit)	0	(87)	(74)	(860)	(859)	(1,447)	(1,686)	(1,986)	(2,368)

**Table No. 2W**  
**Updated Winter Peak Loads and Resources**

Calendar Year	2023	2024	2025	2026	2027	2028	2029	2030	2031
<b>System</b>									
Sufficiency/Deficiency Position	0	(87)	(74)	(860)	(859)	(1,447)	(1,686)	(1,986)	(2,368)
+Uncommitted Coal Retirements	0	0	0	550	550	582	699	699	699
+Signed Contracts & 2020 All-Source RFP	7	55	889	758	760	883	832	782	576
+2021 Demand Response RFP	165	220	276	305	323	353	294	284	272
Updated Position Before FOTs	172	189	1,090	754	775	372	139	(221)	(821)
+Committed FOTs	232	0	0	0	0	0	0	0	0
+Remaining FOTs (up to 2021 IRP Limit)	798	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030
Sufficiency/(Deficiency)	1,202	1,219	2,120	1,784	1,805	1,402	1,169	809	209

The Company appreciates the Commission's consideration of this proposal. Informal questions related to this matter may be directed to Mark Alder at (801) 220-2313.

Sincerely,

Joelle Steward  
 Senior Vice President of Regulation and Customer/Community Solutions