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IDAHO PUBLIC
UTILITIES COMMISSION

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October 20, 2022

VIA ELECTRONIC FILING

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

Attn: Jan Noriyuki
Commission Secretary

**RE: CASE NO. PAC-E-22-16
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
TO UPDATE LOAD AND GAS FORECASTS USED IN THE INTEGRATED
RESOURCE PLAN AVOIDED COST MODEL**

Dear Ms. Noriyuki:

Rocky Mountain Power hereby submits for filing with the Idaho Public Utilities Commission its Application in the above-referenced matter.

Informal questions related to this matter may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Sincerely,

Joelle Steward
SVP, Regulation and Customer/Community Solutions

Enclosures

Joe Dallas (ISB# 10330)
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Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. PAC-E-22-16
OF ROCKY MOUNTAIN POWER TO)
UPDATE LOAD AND GAS FORECASTS) APPLICATION OF
USED IN THE INTEGRATED RESOURCE)
PLAN AVOIDED COST MODEL) ROCKY MOUNTAIN POWER

Rocky Mountain Power, a division of PacifiCorp, (“Company”), hereby respectfully submits this Application to the Idaho Public Utilities Commission, (“Commission”), in compliance with Order Nos. 32697 and 32802 to update the load forecast, natural gas forecast, and long-term contract components of the Integrated Resource Plan (“IRP”) avoided cost model. In support of this Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power provides electric service to retail customers in the states of Idaho, Utah, and Wyoming. Rocky Mountain Power is a public utility in the state of Idaho and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers pursuant to Idaho Code 61-129. Rocky Mountain Power provides retail electric service to approximately 86,500 customers in the state of Idaho.

I. BACKGROUND

2. Order No. 32697 specified that the inputs to the IRP methodology calculation, utilized to determine the avoided cost for all new Public Utility Regulatory Policies Act of 1978 (“PURPA”) qualifying facility (“QF”) projects that exceed the published rate eligibility cap, will

be updated every two years upon acknowledgement of the utility's IRP filing with the exception of the load and the natural gas forecasts which are to be updated annually by June 1st of each year.

The Commission ruled:

“We find that, in order to maintain the most accurate and up to date reflection of a utility's true avoided cost, utilities must update fuel price forecasts and load forecasts annually between IRP filings. For the sake of consistency, these annual updates should occur simultaneously with SAR updates - on June 1 of each year. In addition, it is appropriate to consider long-term contract commitments because of the potential effect that such commitments have on a utility's load and resource balance. We find it reasonable to include long-term contract considerations in an IRP Methodology calculation at such time as the QF and utility have entered into a signed contract for the sale and purchase of QF power. We further find it appropriate to consider PURPA contracts that have terminated or expired in each utility's load and resource balance. We find it reasonable that all other variables and assumptions utilized within the IRP Methodology remain fixed between IRP filings (every two years).”¹

3. Order No. 32802 changed the due date of the annual update from June 1st to October 15th of each year. If approved, the load forecast, natural gas forecast, and contract information presented below will be incorporated into Rocky Mountain Power's IRP avoided cost model. Consistent with the Commission's prior orders, this methodology will be utilized by the Company as the starting point for negotiation of contractual avoided cost rates as of October 15, 2022.

II. LOAD FORECAST

4. The Company's May 2022 and May 2021 long-term load forecasts are summarized in Table 1. The May 2022 load forecast shows overall an increase in load compared to the May 2021 load forecast provided in Case No. PAC-E-21-20, which was subsequently approved by Commission Order No. 35317. The change in the forecast is primarily due to growth expectations for industrial and commercial customers.

¹ In the matter of the Commission's review of PURPA QF contract provisions including the Surrogate Avoided Resources (SAR) and Integrated Resource Planning (IRP) methodologies for calculating avoided cost rates. Case No. GNR-E-11-03, Order No. 32697, p. 22.

Table 1
Rocky Mountain Power Load Forecast Annual GWh

Load Forecast - May 2022								
Year	California	Idaho	Oregon	Utah	Washington	Wyoming	FERC	Total
2022	882	3,952	15,524	26,990	4,550	9,499	277	61,673
2023	870	4,024	16,729	27,717	4,574	9,570	275	63,760
2024	868	4,004	18,770	28,501	4,577	9,645	274	66,640
2025	862	4,009	19,905	29,160	4,537	9,912	272	68,656
2026	858	4,019	20,252	29,760	4,513	9,906	270	69,577
2027	858	4,025	21,471	30,146	4,501	9,863	141	71,005
2028	859	4,036	23,158	30,611	4,507	9,928	23	73,122
2029	855	4,033	23,676	31,011	4,490	9,892	23	73,980
2030	854	4,035	23,872	31,268	4,486	9,938	23	74,476
2031	854	4,038	24,723	31,574	4,487	9,921	23	75,621
2032	855	4,047	25,167	31,979	4,506	9,985	24	76,563
2033	852	4,044	24,021	32,332	4,504	9,965	24	75,743
2034	853	4,047	24,230	32,823	4,521	9,966	24	76,463
2035	853	4,048	24,464	33,365	4,542	9,966	24	77,262
2036	854	4,059	24,768	34,041	4,584	10,000	25	78,330
2037	848	4,060	25,007	34,612	4,606	9,994	25	79,152
2038	843	4,071	25,290	35,274	4,647	10,012	25	80,162
2039	838	4,084	25,571	35,932	4,688	10,034	25	81,173
2040	834	4,101	25,898	36,662	4,736	10,079	25	82,336
2041	823	4,104	26,149	37,310	4,746	10,073	26	83,230

Load Forecast - May 2021								
Year	California	Idaho	Oregon	Utah	Washington	Wyoming	FERC	Total
2021	864	3,931	15,162	26,824	4,526	9,206	297	60,810
2022	863	3,924	15,310	27,521	4,506	9,427	295	61,846
2023	864	3,908	15,706	28,103	4,489	9,470	294	62,833
2024	860	3,901	15,866	28,408	4,447	9,665	291	63,438
2025	859	3,901	15,798	28,766	4,424	9,674	289	63,712
2026	859	3,902	16,051	29,147	4,412	9,665	151	64,187
2027	860	3,910	16,385	29,632	4,420	9,698	22	64,927
2028	856	3,910	16,640	29,924	4,411	9,684	22	65,447
2029	854	3,909	16,907	30,294	4,417	9,686	22	66,089
2030	851	3,913	17,056	30,603	4,426	9,690	22	66,562
2031	852	3,925	17,273	30,984	4,451	9,720	23	67,228
2032	848	3,929	17,078	31,267	4,451	9,701	23	67,296
2033	847	3,941	17,297	31,673	4,474	9,708	23	67,963
2034	847	3,954	17,525	32,082	4,501	9,718	23	68,649
2035	848	3,974	17,804	32,580	4,547	9,759	23	69,536
2036	842	3,984	18,011	32,968	4,570	9,759	24	70,157
2037	836	4,001	18,269	33,414	4,609	9,783	24	70,936
2038	830	4,021	18,528	33,844	4,648	9,807	24	71,704
2039	825	4,044	18,830	34,327	4,699	9,855	24	72,606
2040	816	4,054	19,034	34,675	4,717	9,852	25	73,173

Loads are net of Demand Side Management

III. NATURAL GAS PRICE FORECAST

5. The Company’s most recent Official Forward Price Curve (“OFPC”) was prepared on September 30, 2022 (“2209 OFPC”). The price forecast used in Case No. PAC-E-21-20 was prepared on September 30, 2021 (“2109 OFPC”). Table 2 provides the 2209 OFPC natural gas prices summarized annually by market hub. The 2109 OFPC is also provided for reference only. Generally gas prices in the 2209 OFPC are up over all forecast years compared to the 2109 OFPC.

Table 2
Natural Gas Price - \$/MMBtu

Official Forward Price Curve - (2209) - 09/30/2022							
Year	Opal Gas Index	Sumas Index	Stanfield Index	San Juan Index	Henry Hub Index	AECO Index	SOCALBOR Index
2022(a)	\$6.52	\$6.09	\$5.46	\$6.28	\$6.83	\$3.76	\$7.05
2023	\$5.39	\$4.50	\$4.34	\$5.19	\$5.44	\$3.61	\$6.10
2024	\$4.64	\$3.99	\$3.64	\$4.49	\$4.74	\$3.31	\$5.38
2025	\$4.54	\$3.98	\$3.62	\$4.43	\$4.65	\$3.54	\$5.46
2026	\$4.69	\$4.47	\$4.35	\$4.69	\$4.86	\$4.15	\$5.37
2027	\$4.78	\$4.85	\$4.94	\$4.88	\$4.99	\$4.60	\$5.23
2028	\$4.78	\$4.84	\$4.97	\$4.92	\$5.05	\$4.60	\$5.26
2029	\$4.85	\$4.89	\$5.08	\$5.03	\$5.15	\$4.68	\$5.38
2030	\$4.99	\$5.04	\$5.25	\$5.20	\$5.37	\$4.80	\$5.55
2031	\$5.11	\$5.17	\$5.38	\$5.33	\$5.49	\$4.95	\$5.68
2032	\$5.48	\$5.58	\$5.66	\$5.62	\$5.74	\$5.29	\$5.97
2033	\$5.75	\$5.83	\$5.95	\$5.90	\$6.03	\$5.56	\$6.27
2034	\$5.83	\$5.90	\$6.05	\$6.01	\$6.12	\$5.63	\$6.38
2035	\$5.92	\$5.99	\$6.14	\$6.10	\$6.23	\$5.73	\$6.46
2036	\$5.86	\$5.93	\$6.12	\$6.08	\$6.19	\$5.68	\$6.43
2037	\$6.10	\$6.12	\$6.40	\$6.36	\$6.47	\$5.92	\$6.72
2038	\$6.37	\$6.37	\$6.69	\$6.66	\$6.81	\$6.18	\$7.03
2039	\$6.65	\$6.64	\$7.01	\$6.97	\$7.15	\$6.46	\$7.34
2040	\$6.78	\$6.78	\$7.17	\$7.15	\$7.32	\$6.60	\$7.51
2041	\$7.14	\$7.11	\$7.53	\$7.50	\$7.71	\$6.95	\$7.87

Table 2 Continued
Natural Gas Price - \$/MMBTU

Year	Official Forward Price Curve (2109) - 09/30/2021						
	Opal Gas Index	Sumas Index	Stanfield Index	San Juan Index	Henry Hub Index	AECO Index	SOCALBOR Index
2022(a)	\$4.30	\$4.05	\$3.90	\$3.85	\$4.02	\$3.10	\$5.23
2023	\$3.51	\$3.23	\$3.37	\$3.27	\$3.47	\$2.66	\$4.64
2024	\$3.24	\$3.01	\$3.08	\$2.99	\$3.21	\$2.43	\$4.20
2025	\$3.09	\$3.00	\$2.91	\$2.87	\$3.25	\$2.46	\$3.78
2026	\$2.89	\$2.87	\$2.76	\$2.75	\$3.28	\$2.47	\$3.16
2027	\$2.93	\$2.97	\$2.77	\$2.85	\$3.33	\$2.45	\$3.24
2028	\$3.01	\$3.01	\$2.82	\$2.94	\$3.46	\$2.50	\$3.31
2029	\$3.08	\$3.13	\$2.92	\$3.05	\$3.60	\$2.60	\$3.35
2030	\$3.25	\$3.25	\$3.06	\$3.21	\$3.74	\$2.69	\$3.53
2031	\$3.39	\$3.35	\$3.18	\$3.36	\$3.83	\$2.77	\$3.70
2032	\$3.46	\$3.42	\$3.24	\$3.42	\$3.89	\$2.82	\$3.77
2033	\$3.46	\$3.45	\$3.24	\$3.40	\$3.90	\$2.84	\$3.74
2034	\$3.61	\$3.57	\$3.35	\$3.54	\$4.04	\$2.94	\$3.88
2035	\$3.72	\$3.63	\$3.42	\$3.65	\$4.10	\$2.95	\$4.01
2036	\$3.79	\$3.68	\$3.47	\$3.71	\$4.17	\$3.01	\$4.07
2037	\$3.91	\$3.81	\$3.57	\$3.81	\$4.30	\$3.12	\$4.19
2038	\$4.09	\$3.93	\$3.68	\$3.99	\$4.53	\$3.23	\$4.39
2039	\$4.29	\$4.11	\$3.88	\$4.19	\$4.76	\$3.44	\$4.61
2040	\$4.45	\$4.22	\$3.99	\$4.34	\$4.99	\$3.54	\$4.78
2041	\$4.61	\$4.31	\$4.08	\$4.48	\$5.14	\$3.63	\$4.93

(a) 2022 Forecast gas prices are for November and December only

IV. CONTRACT TERMINATIONS, EXPIRATIONS, AND ADDITIONS

6. Since filing Case No. PAC-E-21-20, the Company has signed 19 long-term contracts, including 12 long-term contracts with qualifying facilities, for a total nameplate capacity of 1,018.4 megawatts. Two long-term contracts have expired without renewal and nine long-term contracts expired and were renewed, for a total nameplate capacity of 359.1 megawatts. Table 3 provides a list of signed and expired or terminated contracts since October 1, 2021.

7. Rocky Mountain Power currently has 38 non-PURPA, long-term power purchase agreements with a nameplate capacity of 3,108 megawatts, and 156 PURPA QF contracts with a nameplate capacity of 2,265 megawatts. New contracts, terminated or expired contracts, as well as new contract pricing are all updated in the IRP model on a continuous basis.

Table 3

Long Term Contracts signed since the October 2021 Filing					
No.	Contract	Qualifying Facility (QF)	Nameplate (MW)	Start Date	End Date
1	Hayward Paul Luckey	QF	0.1	12/1/2021	12/31/2035
2	Sunnyside Solar, LCL	QF	5.0	9/30/2023	9/29/2035
3	Tata Chemicals (Soda Ash) Partners	QF	30.0	1/1/2023	12/31/2023
4	Amy Family Holdings	QF	0.7	1/1/2023	12/31/2042
5	Georgetown Irrigation Company	QF	0.5	4/1/2022	3/31/2042
6	Three Sisters Irrigation District	QF	0.3	6/15/2022	11/30/2041
7	Cedar Springs Wind IV, LLC		350.4	12/31/2024	12/30/2054
8	Anticline Wind, LLC		100.5	12/31/2024	12/30/2054
9	Commercial Energy Management, Inc.	QF	0.9	3/1/2021	11/30/2036
10	Stahlbush Island Farms, Inc.	QF	1.6	6/1/2022	5/31/2023
11	United States of America Department of Interior Bureau of Land Mgmt	QF	0.1	9/1/2022	8/31/2023
12	Douglas County (Galesville Dam)	QF	1.9	8/15/2022	12/31/2034
13	Chopin Wind, LLC	QF	10.0	11/15/2022	5/29/2036
14	Boswell Wind, LLC		320.0	1/1/2025	12/31/2054
15	City of Hurricane		0.002	9/1/2022	1/31/2023
16	Oregon State University	QF	6.5	10/1/2022	9/30/2027
17	Public Utility District No. 2 of Grant County		21.4	1/1/2023	12/31/2023
18	Public Utility District No. 2 of Grant County		18.4	1/1/2023	12/31/2023
19	Public Utility District No. 2 of Grant County		150.2	1/1/2023	12/31/2023
Total Signed MW			1,018.4		

Long Term Contracts Expired or Terminated since the October 2021 Filing				
No.	Contract	Qualifying Facility (QF)	Nameplate (MW)	Date
1	Dry Creek	QF	3.4	4/30/2022
2	Birch Power Company, Inc	QF	2.6	3/31/2022
3	Douglas County (Galesville Dam)	QF	1.9	4/15/2022
4	Public Utility District No. 2 of Grant County		18.4	12/31/2021
5	Public Utility District No. 2 of Grant County		150.2	12/31/2021
6	Georgetown Irrigation Company	QF	0.5	3/31/2022
7	City of Hurricane		0.002	8/31/2022
8	Middle Fork Irrigation District	QF	0.9	12/31/2021
9	Mink Creek Hydro LLC	QF	3.0	3/31/2022
10	Oregon Environmental Industries, LLC	QF	3.2	9/30/2022
11	Seattle City Light		175.0	2/28/2022
Total Terminated MW			359.1	

V. COMMUNICATIONS

8. Communications regarding this filing should be addressed to:

Ted Weston
Idaho Regulatory Affairs Manager
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, Utah 84116
Telephone: (801) 220-2963
Email: ted.weston@pacificorp.com

Joe Dallas
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Telephone: (360) 560-1937
Email: joseph.dallas@pacificorp.com

In addition, Rocky Mountain Power requests that all data requests regarding this Application be sent in Microsoft Word to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 Multnomah, Suite 2000
Portland, Oregon 97232

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

VI. MODIFIED PROCEDURE

9. The Company believes that a hearing is not necessary to consider the issues presented herein and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing. RP 201 *et seq.*

VII. REQUEST FOR RELIEF

WHEREFORE, Rocky Mountain Power hereby respectfully submits its updated load forecast, natural gas forecast, and QF contract information in compliance with the Commission's directives in Order Nos. 32697 and 32802 and requests that the Commission issue an order approving this updated information for inclusion in the Company's IRP avoided cost calculations.

DATED this 20th day of October 2022.

Respectfully submitted,
ROCKY MOUNTAIN POWER

A handwritten signature in blue ink, appearing to read "Joe Dallas", is written over a horizontal line.

Joe Dallas
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Email: joseph.dallas@pacificorp.com

Attorney for Rocky Mountain Power