



May 13, 2024

VIA ELECTRONIC DELIVERY

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

**RE: CASE NO. PAC-E-24-01
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR
APPROVAL OF A CAPACITY DEFICIENCY PERIOD TO BE USED FOR AVOIDED
COST CALCULATIONS**

Attention: Commission Secretary

Pursuant to Commission Order No. 36090 authorizing the processing of the Application by Modified Procedure and establishing the procedural schedule please find Rocky Mountain Power's Reply Comments in the above referenced matter.

Informal inquiries may be directed to Mark Alder, Idaho Regulatory Manager at (801) 220-2313.

Very truly yours,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is fluid and cursive.

Joelle Steward
Senior Vice President, Regulation and Customer & Community Solutions

Joe Dallas (ISB# 10330)
PacifiCorp, Senior Attorney
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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-24-01
OF ROCKY MOUNTAIN POWER FOR)
APPROVAL OF A CAPACITY) REPLY COMMENTS OF
DEFICIENCY PERIOD TO BE USED FOR) ROCKY MOUNTAIN POWER
AVOIDED COST CALCULATIONS)**

Pursuant to Rule 202.01(d) of the Rules of Procedure of the Idaho Public Utilities Commission (“Commission”) and the Commission’s February 15, 2024, Notice of Application and Notice of Modified Procedure, Rocky Mountain Power a division of PacifiCorp (the “Company”) hereby submits reply comments in the above-referenced case.

I. BACKGROUND

1. On January 19, 2024, the Company applied for approval of the capacity deficiency period beginning July 2024 to be used in avoided cost calculations using the Surrogate Avoided Resource (“SAR”) methodology applicable to small qualifying facilities (“QFs”) eligible for standard pricing (known as “SAR-Based Contracts”) and using the Integrated Resource Plan (“IRP”) methodology applicable to larger QFs eligible for project-specific pricing (known as “IRP-Based Contracts”).

2. On February 15, 2024, Commission Order No. 36069 provided public notice of the Company’s application and also a notice of modified procedure establishing the procedural

schedule allowing persons who would like to file written comments to have until April 29, 2024, and the Company having until May 13, 2024, to file reply comments.

3. On April 29, 2024, Commission Staff filed comments. No other party has intervened or filed reply comments.

II. REPLY COMMENTS

4. Staff recommends that the Commission order the Company to file a compliance filing incorporating several recommendations. The Company addresses each of these recommendations below:

Staff Recommendation 1: Break the “Existing – Demand Response” line item into different components with clear labels, such as existing Demand Response (“DR”) programs, growth of existing DR programs, approved future DR programs, and growth of approved future DR Programs.

The Company has incorporated the proposed change in the compliance filing attached to this application as Attachment A.

Staff Recommendation 2: Use a 79% PURPA renewal rate for other states.

The Company has incorporated the proposed change in the compliance filing attached to this application as Attachment A.

Staff Recommendation 3: Include all the contract updates as of the date of the compliance filing.

In response to Staff Production Request No. 8, the Company provided Staff with an updated version of the load and resource balance that included executed contracts through February 2024. The Company has not signed any significant long-term contracts in the interim, but has

incorporated the proposed contract updates in the compliance filing attached to this application as Attachment A.

Staff Recommendation 4: Remove all the early coal retirements from the L&R in the compliance filing, if not done so already.

The Company's initial filing included the capacity from all coal-fired resources through their modeled end of life, that is, the latest retirement year considered as a potential alternative in the 2023 IRP.¹ The only retirements prior to 2030 are minority-owned units, with retirement dates identified by the joint owners, and the three smallest units at Dave Johnston, which are the oldest coal plants in the Company's fleet. The Company believes its initial filing, which used the expected closure date of minority owned plants, is in compliance with Staff's recommendation and Order No. 34918.

Staff Recommendation 5: Use the Front Office Transactions ("FOT") limits of 3,326 MW for 2023 through 2027 in the L&R. The Company has incorporated the proposed change in the compliance filing attached to this application as Attachment A.

III. CONFIDENTIAL INFORMATION

5. This filing, specifically the workpapers, contain confidential information including trade secret and other Company confidential information exempt from public review under Idaho Code §§ 74-104–109 and Idaho Public Utilities Commission's Rule of Procedure 67.

¹ See the 2023 IRP, Volume I: The potential retirement options for majority-owned units are shown in Table 8.1. Minority-owned unit retirement dates reflect discussions with the joint owners, and were not allow to deviate from those shown in Table 6.2.

IV. REQUEST FOR RELIEF

6. Based on the foregoing, the Company respectfully requests that the Commission accept the attached compliance filing as complying with the items raised by Staff in their reply comments and issue an order capacity deficiency period beginning July 2025 be used in the Company's avoided cost determinations under the SAR methodology, for both SAR-Based Contracts and IRP-Based Contracts.

DATED this 13th day of May 2024.

Respectfully submitted,
ROCKY MOUNTAIN POWER

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

Joe Dallas (ISB# 10330)
PacifiCorp, Senior Attorney
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Portland, OR 97232
Email: joseph.dallas@pacificorp.com
Attorney for Rocky Mountain Power

ATTACHMENT A

Table 1 - Compliance Filing (Summer)

Summer Peak Load and Resources without Additions

System	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Total Resources	10,742	8,642	8,383	8,280	7,795	7,086	7,258	7,318	6,890	6,191	6,230	6,141	6,983	5,890	4,513	4,537	3,932	4,010	4,168
Obligation	10,919	11,163	11,110	11,285	11,609	11,733	11,727	11,830	11,816	11,857	11,904	12,003	12,101	12,086	12,180	12,258	12,426	12,571	12,840
Planning Reserves (13%)	1,419	1,451	1,444	1,467	1,509	1,525	1,524	1,538	1,536	1,541	1,547	1,560	1,573	1,571	1,583	1,594	1,615	1,634	1,669
Obligation + Reserves	12,338	12,614	12,554	12,752	13,118	13,259	13,251	13,367	13,352	13,398	13,451	13,564	13,674	13,658	13,763	13,852	14,042	14,205	14,509
System Position	(1,596)	(3,972)	(4,171)	(4,472)	(5,323)	(6,172)	(5,993)	(6,050)	(6,462)	(7,207)	(7,221)	(7,423)	(6,691)	(7,767)	(9,250)	(9,315)	(10,110)	(10,195)	(10,341)
FOT Limit with Reserves	3,426	3,426	3,426	3,426	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515
Sufficiency/(Deficiency)	1,830	(547)	(746)	(1,046)	(4,808)	(5,657)	(5,478)	(5,535)	(5,947)	(6,692)	(6,706)	(6,908)	(6,176)	(7,252)	(8,735)	(8,800)	(9,595)	(9,680)	(9,826)

Table 2 - Compliance Filing (Winter)

Winter Peak Load and Resources without Additions

System	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Total Resources	8,575	8,927	8,755	9,369	8,664	7,745	7,515	8,555	8,241	7,492	7,232	6,745	6,918	6,544	5,122	4,916	4,483	4,314	4,498
Obligation	9,271	9,486	9,494	9,753	10,026	10,059	10,075	10,114	10,117	10,213	10,272	10,354	10,365	10,427	10,544	10,687	10,814	10,945	11,129
Planning Reserves (13%)	1,205	1,233	1,234	1,268	1,303	1,308	1,310	1,315	1,315	1,328	1,335	1,346	1,347	1,355	1,371	1,389	1,406	1,423	1,447
Obligation + Reserves	10,476	10,719	10,728	11,021	11,329	11,366	11,385	11,429	11,432	11,540	11,607	11,700	11,713	11,782	11,914	12,076	12,220	12,367	12,576
System Position	(1,901)	(1,793)	(1,973)	(1,653)	(2,665)	(3,622)	(3,871)	(2,874)	(3,191)	(4,049)	(4,375)	(4,954)	(4,795)	(5,238)	(6,792)	(7,160)	(7,737)	(8,053)	(8,078)
FOT Limit with Reserves	3,426	3,426	3,426	3,426	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030
Sufficiency/(Deficiency)	1,525	1,633	1,452	1,773	(1,635)	(2,592)	(2,841)	(1,844)	(2,161)	(3,019)	(3,345)	(3,924)	(3,765)	(4,208)	(5,762)	(6,130)	(6,707)	(7,023)	(7,048)

Table 3 - Compliance vs. Initial Filing (Summer)

Summer Peak Load and Resources without Additions

System	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Total Resources	246	260	1	16	15	18	29	30	37	34	45	44	66	176	162	165	159	158	160
Obligation	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Planning Reserves (13%)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Obligation + Reserves	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
System Position	247	260	2	16	15	18	29	31	37	34	45	44	66	176	162	166	160	158	160
FOT Limit with Reserves	2,911	2,911	2,911	2,911	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sufficiency/(Deficiency)	3,157	3,171	2,912	2,927	15	18	29	31	37	34	45	44	66	176	162	166	160	158	160

Table 4 - Compliance vs. Initial Filing (Winter)

Winter Peak Load and Resources without Additions

System	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Total Resources	19	31	0	16	16	19	31	34	32	32	53	50	55	103	85	82	80	78	77
Obligation	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Planning Reserves (13%)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Obligation + Reserves	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
System Position	19	31	0	17	16	20	31	35	32	32	53	50	55	103	85	82	80	78	77
FOT Limit with Reserves	2,396	2,396	2,396	2,396	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sufficiency/(Deficiency)	2,415	2,427	2,396	2,412	16	20	31	35	32	32	53	50	55	103	85	82	80	78	77

2023 IRP, P-MM (Compliance Filing)
Summer Peak L&R - without Resource Additions

East	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Thermal	5,271	5,056	4,873	4,893	4,857	4,523	4,191	4,332	4,454	4,158	3,636	3,631	3,622	4,043	3,482	2,384	2,395	1,994	2,032	2,111
Hydroelectric	87	70	65	65	65	62	60	62	64	59	53	53	52	62	57	47	47	41	43	47
Renewable	1,302	1,457	1,373	1,707	1,686	1,619	1,347	1,417	1,351	1,321	1,282	1,326	1,275	1,469	1,269	1,175	1,178	1,092	1,099	1,113
Storage	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
Purchase	104	100	31	27	26	23	22	22	23	21	19	19	19	22	20	16	16	14	15	17
Qualifying Facilities	850	960	554	353	336	307	264	275	254	246	231	230	214	248	179	164	161	143	145	146
Sale	(21)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Existing Resources	7,594	7,644	6,897	7,046	6,970	6,535	5,885	6,110	6,147	5,806	5,221	5,259	5,181	5,844	5,007	3,785	3,798	3,285	3,335	3,435
Load	7,485	7,720	7,889	7,886	8,074	8,406	8,376	8,516	8,731	8,849	8,981	9,134	9,301	9,541	9,680	9,844	9,987	10,160	10,340	10,565
Private Generation	(83)	(118)	(157)	(200)	(248)	(301)	(263)	(311)	(364)	(418)	(472)	(522)	(571)	(620)	(668)	(716)	(763)	(808)	(856)	(902)
Existing - Demand Response	(229)	(233)	(193)	(166)	(159)	(145)	(136)	(141)	(142)	(129)	(113)	(115)	(115)	(138)	(120)	(98)	(100)	(89)	(95)	(102)
Growth/Newly Approved - Demand Response	(0)	(1)	(6)	(8)	(11)	(11)	(11)	(11)	(13)	(12)	(10)	(10)	(10)	(12)	(11)	(20)	(21)	(19)	(21)	(23)
Existing - Energy Efficiency	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)	(70)
New Energy Efficiency	(71)	(99)	(162)	(231)	(321)	(412)	(484)	(581)	(739)	(848)	(931)	(1,023)	(1,096)	(1,205)	(1,368)	(1,437)	(1,529)	(1,592)	(1,638)	(1,612)
East Total obligation	7,031	7,200	7,301	7,211	7,265	7,467	7,412	7,401	7,403	7,372	7,385	7,394	7,439	7,497	7,443	7,503	7,504	7,582	7,661	7,856
Planning Reserve Margin (13%)	914	936	949	937	944	971	964	962	962	958	960	961	967	975	968	975	976	986	996	1,021
East Obligation + Reserves	7,946	8,135	8,250	8,148	8,210	8,438	8,376	8,363	8,365	8,330	8,345	8,356	8,406	8,472	8,411	8,478	8,479	8,567	8,657	8,878
East Position	(351)	(491)	(1,353)	(1,102)	(1,240)	(1,903)	(2,491)	(2,253)	(2,218)	(2,524)	(3,125)	(3,096)	(3,225)	(2,628)	(3,404)	(4,694)	(4,682)	(5,282)	(5,322)	(5,442)
Max Market Purchases Target	723	723	723	723	723	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
West																				
Thermal	631	603	575	585	579	560	542	468	481	446	397	396	395	466	289	234	237	206	217	240
Hydroelectric	604	535	544	525	520	502	486	503	517	480	426	426	424	501	461	374	379	329	346	383
Renewable	201	217	153	127	122	118	109	112	112	98	93	94	90	110	88	78	84	75	77	76
Storage	0	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Purchase	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Qualifying Facilities	223	254	186	148	137	127	105	108	105	100	91	91	86	104	84	73	71	63	64	66
Sale	(75)	(54)	(51)	(50)	(50)	(48)	(43)	(46)	(47)	(42)	(38)	(38)	(37)	(43)	(40)	(34)	(34)	(29)	(30)	(33)
West Existing Resources	1,585	1,558	1,410	1,337	1,311	1,260	1,201	1,148	1,171	1,084	971	970	960	1,139	884	728	739	647	675	733
Load	3,656	3,863	4,067	4,140	4,309	4,481	4,655	4,711	4,873	4,913	4,992	5,070	5,147	5,230	5,320	5,400	5,481	5,575	5,667	5,807
Private Generation	(25)	(37)	(51)	(67)	(83)	(101)	(85)	(100)	(117)	(135)	(153)	(169)	(185)	(199)	(214)	(228)	(242)	(256)	(270)	(283)
Existing - Demand Response	(8)	(7)	(7)	(6)	(6)	(5)	(5)	(5)	(5)	(5)	(4)	(4)	(4)	(5)	(4)	(4)	(4)	(3)	(3)	(4)
Growth/Newly Approved - Demand Response	0	(2)	(9)	(12)	(19)	(20)	(21)	(22)	(24)	(22)	(19)	(19)	(20)	(23)	(21)	(20)	(21)	(18)	(19)	(22)
Existing - Energy Efficiency	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)	(31)
New Energy Efficiency	(37)	(66)	(107)	(125)	(150)	(182)	(193)	(228)	(269)	(277)	(313)	(337)	(343)	(369)	(406)	(440)	(429)	(423)	(434)	(485)
West Total obligation	3,556	3,719	3,862	3,899	4,020	4,142	4,321	4,325	4,427	4,444	4,472	4,509	4,564	4,603	4,643	4,677	4,754	4,845	4,910	4,984
Planning Reserve Margin (13%)	462	483	502	507	523	538	562	562	575	578	581	586	593	598	604	608	618	630	638	648
West Obligation + Reserves	4,018	4,203	4,364	4,406	4,543	4,680	4,883	4,888	5,002	5,022	5,053	5,095	5,158	5,202	5,247	5,285	5,373	5,475	5,548	5,632
West Position	(2,434)	(2,645)	(2,954)	(3,069)	(3,232)	(3,420)	(3,682)	(3,740)	(3,832)	(3,938)	(4,082)	(4,125)	(4,198)	(4,063)	(4,363)	(4,556)	(4,633)	(4,828)	(4,873)	(4,899)
Max Market Purchases Target	2,603	2,603	2,603	2,603	2,603	500	500	500	500	500	500	500	500	500	500	500	500	500	500	500
System																				
Total Resources	9,179	9,202	8,307	8,383	8,280	7,795	7,086	7,258	7,318	6,890	6,191	6,230	6,141	6,983	5,890	4,513	4,537	3,932	4,010	4,168
Obligation	10,587	10,919	11,163	11,110	11,285	11,609	11,733	11,727	11,830	11,816	11,857	11,904	12,003	12,101	12,086	12,180	12,258	12,426	12,571	12,840
Planning Reserves (13%)	1,376	1,419	1,451	1,444	1,467	1,509	1,525	1,524	1,538	1,536	1,541	1,547	1,560	1,573	1,571	1,583	1,594	1,615	1,634	1,669
Obligation + Reserves	11,964	12,338	12,614	12,554	12,752	13,118	13,259	13,251	13,367	13,352	13,398	13,451	13,564	13,674	13,658	13,763	13,852	14,042	14,205	14,509
System Position	(2,785)	(3,136)	(4,307)	(4,171)	(4,472)	(5,323)	(6,172)	(5,993)	(6,050)	(6,462)	(7,207)	(7,221)	(7,423)	(6,691)	(7,767)	(9,250)	(9,315)	(10,110)	(10,195)	(10,341)
Max Market Purchases Target with Reserves		3,426	3,426	3,426	3,426	515	515	515	515	515	515	515	515	515	515	515	515	515	515	515
Committed Market Purchases with Reserves		1,540	335																	
Net Surplus/(Deficit)		1,830	(547)	(746)	(1,046)	(4,808)	(5,657)	(5,478)	(5,535)	(5,947)	(6,692)	(6,706)	(6,908)	(6,176)	(7,252)	(8,735)	(8,800)	(9,595)	(9,680)	(9,826)

2023 IRP, P-MM (Compliance Filing)
Winter Peak L&R - without Resource Additions

East	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042
Thermal	5,894	5,321	5,478	5,151	5,547	5,383	4,804	4,613	5,407	5,102	4,663	4,469	4,174	4,164	3,933	2,860	2,768	2,396	2,338	2,403
Hydroelectric	71	57	56	54	57	58	54	54	61	58	56	52	47	49	52	46	44	41	39	42
Renewable	879	1,188	1,619	1,897	2,044	1,556	1,338	1,383	1,456	1,514	1,302	1,329	1,272	1,393	1,357	1,172	1,110	1,111	1,055	1,079
Storage	1	1	1	1	1	1	1	1	1	1	1	0	0	0	0	0	0	0	0	0
Purchase	116	70	34	28	28	27	24	24	27	25	24	22	20	21	22	20	19	18	17	18
Qualifying Facilities	216	248	209	193	208	157	142	145	155	156	135	123	114	116	116	94	89	83	83	115
Sale	(23)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Existing Resources	7,154	6,885	7,396	7,324	7,885	7,182	6,363	6,219	7,105	6,856	6,180	5,995	5,627	5,744	5,480	4,192	4,030	3,649	3,531	3,656
Load	5,833	5,890	6,032	6,039	6,253	6,426	6,496	6,586	6,680	6,739	6,882	6,990	7,093	7,171	7,319	7,448	7,592	7,711	7,816	7,969
Private Generation	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Existing - Demand Response	(136)	(128)	(116)	(96)	(99)	(91)	(82)	(82)	(91)	(88)	(83)	(78)	(71)	(74)	(78)	(69)	(66)	(62)	(59)	(63)
Growth/Newly Approved - Demand Response	(0)	(0)	(4)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(6)	(5)	(5)	(5)	(5)	(5)	(5)	(5)	(5)	(5)
Existing - Energy Efficiency	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)	(40)
New Energy Efficiency	(41)	(80)	(150)	(180)	(238)	(301)	(346)	(416)	(544)	(598)	(669)	(729)	(770)	(827)	(951)	(986)	(1,025)	(1,090)	(1,057)	(1,144)
East Total obligation	5,615	5,642	5,722	5,718	5,870	5,987	6,022	6,043	5,997	6,007	6,083	6,137	6,206	6,224	6,245	6,348	6,454	6,513	6,655	6,716
Planning Reserve Margin (13%)	730	734	744	743	763	778	783	786	780	781	791	798	807	809	812	825	839	847	865	873
East Obligation + Reserves	6,345	6,376	6,466	6,461	6,633	6,765	6,805	6,828	6,777	6,788	6,874	6,934	7,013	7,033	7,056	7,173	7,294	7,360	7,521	7,589
East Position	809	509	930	863	1,252	416	(443)	(609)	329	69	(694)	(939)	(1,386)	(1,289)	(1,576)	(2,981)	(3,263)	(3,712)	(3,990)	(3,933)
Max Market Purchases Target	723	723	723	723	723	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
West																				
Thermal	745	707	687	672	701	698	655	563	630	606	575	541	490	514	369	325	307	291	271	291
Hydroelectric	749	692	686	642	670	680	637	637	714	684	657	616	556	581	614	541	517	484	451	485
Renewable	95	107	98	88	91	75	68	79	86	77	61	63	56	65	67	53	47	47	47	52
Storage	0	2	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Purchase	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Qualifying Facilities	94	91	86	79	76	75	62	60	67	61	57	54	50	51	51	44	42	40	38	41
Sale	(80)	(58)	(55)	(53)	(56)	(48)	(43)	(45)	(50)	(46)	(41)	(39)	(36)	(40)	(39)	(34)	(30)	(30)	(27)	(29)
West Existing Resources	1,604	1,541	1,505	1,431	1,484	1,482	1,382	1,296	1,449	1,384	1,312	1,237	1,118	1,174	1,064	930	885	835	783	842
Load	3,485	3,738	3,911	3,993	4,148	4,336	4,397	4,415	4,530	4,562	4,607	4,654	4,702	4,772	4,830	4,878	4,943	4,995	5,054	5,132
Private Generation	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)	(1)
Existing - Demand Response	0	0	0	(0)	0	0	0	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)	(0)
Growth/Newly Approved - Demand Response	0	(15)	(19)	(19)	(22)	(24)	(21)	(21)	(24)	(23)	(21)	(20)	(18)	(19)	(20)	(18)	(17)	(16)	(15)	(16)
Existing - Energy Efficiency	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)	(29)
New Energy Efficiency	(35)	(66)	(98)	(168)	(214)	(244)	(310)	(331)	(360)	(399)	(426)	(469)	(506)	(581)	(597)	(634)	(663)	(648)	(719)	(671)
West Total obligation	3,421	3,628	3,764	3,776	3,884	4,039	4,036	4,033	4,117	4,110	4,129	4,135	4,148	4,141	4,182	4,196	4,232	4,301	4,289	4,414
Planning Reserve Margin (13%)	445	472	489	491	505	525	525	524	535	534	537	538	539	538	544	545	550	559	558	574
West Obligation + Reserves	409	406	4,253	4,267	4,388	4,564	4,561	4,557	4,652	4,644	4,666	4,673	4,687	4,680	4,726	4,742	4,782	4,860	4,847	4,987
West Position	1,195	1,136	(2,748)	(2,837)	(2,904)	(3,081)	(3,179)	(3,261)	(3,203)	(3,260)	(3,355)	(3,436)	(3,568)	(3,506)	(3,662)	(3,812)	(3,897)	(4,025)	(4,064)	(4,145)
Max Market Purchases Target	2,603	2,603	2,603	2,603	2,603	700	700	700	700	700	700	700	700	700	700	700	700	700	700	700
System																				
Total Resources	8,758	8,427	8,901	8,755	9,369	8,664	7,745	7,515	8,555	8,241	7,492	7,232	6,745	6,918	6,544	5,122	4,916	4,483	4,314	4,498
Obligation	9,036	9,271	9,486	9,494	9,753	10,026	10,059	10,075	10,114	10,117	10,213	10,272	10,354	10,365	10,427	10,544	10,687	10,814	10,945	11,129
Planning Reserves (13%)	1,175	1,205	1,233	1,234	1,268	1,303	1,308	1,310	1,315	1,315	1,328	1,335	1,346	1,347	1,355	1,371	1,389	1,406	1,423	1,447
Obligation + Reserves	10,210	10,476	10,719	10,728	11,021	11,329	11,366	11,385	11,429	11,432	11,540	11,607	11,700	11,713	11,782	11,914	12,076	12,220	12,367	12,576
System Position	(1,452)	(2,049)	(1,818)	(1,973)	(1,653)	(2,665)	(3,622)	(3,871)	(2,874)	(3,191)	(4,049)	(4,375)	(4,954)	(4,795)	(5,238)	(6,792)	(7,160)	(7,737)	(8,053)	(8,078)
Max Market Purchases Target with Reserves		3,426	3,426	3,426	3,426	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030	1,030
Committed Market Purchases with Reserves		148	26																	
Net Surplus/(Deficit)		1,525	1,633	1,452	1,773	(1,635)	(2,592)	(2,841)	(1,844)	(2,161)	(3,019)	(3,345)	(3,924)	(3,765)	(4,208)	(5,762)	(6,130)	(6,707)	(7,023)	(7,048)