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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF INTERMOUNTAIN GAS COMPANY'S 2019-2023 INTEGRATED RESOURCE PLAN	)))))))	**CASE NO. INT-G-19-07** **COMMENTS OF THE COMMISSION STAFF**

The Staff of the Idaho Public Utilities Commission submits the following comments regarding the above referenced case.

BACKGROUND

On October 18, 2019, Intermountain Gas Company ("Intermountain" or "Company") filed its Integrated Resource Plan ("IRP") for the years 2019-2023. Intermountain files an IRP every two years to describe the Company's plans to meet its customers' future natural gas needs. The IRP must discuss the subjects required by several Commission Orders[1] and Section 303(b)(3) of the Public Utility Regulatory Policies Act ("PURPA"), 15 U.S.C. § 3202. The Idaho Public Utilities Commission ("Commission") reviews the IRP to ensure that it discusses these subjects and represents a diligent effort by the Company to plan for the anticipated supply and demand for natural gas.

[1] *See* Order Nos. 25342, 27024, 27098, 32855, 33314 and 33997.

IRP Requirements

A natural gas IRP describes a company's plans to meet its customers' future natural gas needs. In Order No. 25342, the Commission adopted IRP requirements for local gas distribution companies in response to amended Section 303 of PURPA.

In Order No. 27024, the Commission shortened the IRP's planning horizon from 20 years to 5 years. Order No. 27098 removed any requirement that IRPs formally evaluate potential demand-side management ("DSM") programs, and instead directed the companies to explain whether cost-effective DSM opportunities exist.

In the Company's 2013 IRP case, the Commission 1) directed the Company to continue to work to improve public participation in the IRP process; and 2) allowed the Company to stop filing semi-annual lost and unaccounted for gas ("LAUF Gas") reports. *See* Order No. 32855. The IRP's LAUF Gas section must explain the Company's (a) framework for how it has tested for, identified, and remediated equipment measurement errors or leaks, and (b) business process for alleviating measurement errors through its financial accounting of nominations, scheduling, measurements, flow volume allocation, and billing. *See* Order No. 32855.

In summary, these orders direct the Company to file an IRP every two years that includes:

1. A forecast of future gas demand in firm and interruptible markets for each customer class, which includes the number, type, and efficiency of gas end-users as well as effects from economic forces on gas consumption;
2. An analysis of gas supply options for each customer class, which includes a projection of spot market versus long-term purchases for both firm and interruptible markets, an evaluation of the opportunities for using company-owned or contracted storage or production, an analysis of prospects for Company participation in a gas futures market, and an assessment of opportunities for access to multiple pipeline suppliers or direct purchases from producers;
3. A comparative analysis of gas purchasing options and improvements in the efficient use of gas, and an explanation of whether there are cost-effective DSM opportunities;
4. The integration of the demand forecast and resource evaluations into a long-range (at least a five-year) plan describing the strategies designed to

meet current and future needs at the lowest cost to the Company and its ratepayers;

5. A short-term (e.g., two-year) plan outlining the specific actions to be taken by the Company in implementing the IRP;
6. A progress report that relates the new plan to the previously filed plan; and
7. Public participation.

The 2019-2023 IRP

Intermountain's IRP explains that the Company regularly forecasts the demand of its growing customer base and determines how to best meet the load requirements brought on by this demand. *IRP* at 1-2. The Company's IRP represents a snapshot in time of the Company's ongoing planning process; it describes the anticipated conditions over a five-year planning horizon, the anticipated resource selections, and the process for making resource decisions. *Id*.

Intermountain sells natural gas to two major markets: the residential/commercial market and the large volume market. *Id.* at 1 and 6. In 2018, the Company served 364,512 customers and of that amount, roughly 330,000 are residential customers. *Id.*at 1.

Intermountain states that much of the demand for natural gas is strongly influenced by the agricultural economy and the price of alternative fuels. *Id*. at 2. The Company alleges that in 2018, industrial sales and transportation accounted for 50% of the throughput on Intermountain's system. *Id.*

The Company calculated peak-day delivery under each customer growth scenario against current available natural gas delivery system capacity to project the magnitude and timing of delivery deficits on a regional and a total Company perspective.

STAFF ANALYSIS

Staff examined the Company's IRP to determine whether it meets the Commission requirements and adequately plans for the capability to meet demand from 2019 through 2023. In general, Staff believes that the Company's IRP is reasonable and should be acknowledged. The Company asserts it sees no peak-day delivery deficits over the next five years when it matches its forecasted peak-day delivery against its existing resources.[2] *IRP* at 98. However, during this IRP period, the Company identified deficits on some of its laterals which are described in greater detail in the *Deficits and Regional Summaries* sections below.

In addition, Staff is concerned that the Company's IRP does not include a transparent analysis of the least cost, least risk alternatives for meeting current or projected capacity deficits. In future IRPs, Staff believes that the Company should provide a detailed analysis of how it evaluated and compared alternatives to resolve deficits and make least cost, least risk selections. These concerns are explained in more detail below.

Demand Forecast

The Company forecasted changes in its peak-day loads due to customer growth under its base case, and high and low growth economic scenarios. *Id.* The Company's base case growth scenario forecasted total residential, commercial, and industrial peak-day loads to increase each year for five years by an average of 2.08%. *IRP* at 95. Intermountain says this increase in peak-day loads corresponds to expected growth in the Company's markets for residential and small commercial customers.

The Company's demand forecast is used to determine the timing and capacity of new plant additions. The demand forecast is an important driver of expenditures that will eventually be included in the Company's rate base. Staff believes the Company's methodology for estimating future demand is adequate, but offers the following suggestions for improvement in future IRPs.

The Company's demand forecast is based on three separate components: 1) a prediction of the number of customers in each of the Company's Areas of Interest ("AOI"); 2) predictions of extreme weather events for each AOI; and 3) models relating per-customer consumption to extreme weather events within each AOI. *Id.* at 8. As Staff noted in its 2017 IRP comments, the Company's methods for predicting customer counts and extreme weather events are sound; however, Staff is concerned that the models relating per-customer consumption to extreme weather events may not be sufficiently granular to accurately estimate per-customer consumption

[2] The total Company perspective differs from the laterals in that it reflects the amount of gas that can be delivered to Intermountain via the various resources on the interstate system. Hence, total system deliveries should provide at least the net sum demand – or the total available distribution capacity where applicable – of all the laterals/AOIs on the distribution system. *IRP* at 98.

for a peaking event. Because distribution plant must be sized to meet maximum demand, an inaccurate estimate of per-customer peak consumption could result in incorrectly sized distribution plant equipment.

The Company's per-customer models are created using third party software (Customer Management Module) provided by Intermountain's parent company, DNV GL. *Id.* at 30 - 32. This module produces a least squares model for each customer using local weather information and monthly meter read data. For each customer, the model provides a weather independent base load, as well as a weather sensitive heat load that can be multiplied by a weather variable in order to determine consumption. Staff believes the use of individual models and weather data for each customer to be appropriate; however, Staff is concerned that there is a mismatch between the aggregated monthly data used to create the model and the daily or hourly estimates obtained from the model and used to estimate peak consumption. The Company provided no evidence that the weather sensitive heat load obtained using monthly aggregated data will provide an accurate estimate of consumption over a short duration peaking event. Staff believes that the Company should validate the accuracy of peak estimates obtained from these models during the next IRP cycles. Validation could be performed by comparing the output of individual customer models to actual data obtained from these customers' Advanced Metering Infrastructure ("AMI") meters. Staff believes the Company should validate the peak consumption estimates obtained from DNV GL's Customer Management Module using actual peak information from the Company's AMI meters.

Staff notes that the Company has installed approximately 50% of the AMI meters it intends to install. *Id.* at 71. When deployed, these meters will allow the Company to collect consumption data over much shorter time periods, and thus be able to develop models capable of accurately estimating peak consumption. Until these meters are fully deployed, Staff believes that data obtained from a sample of these meters can, and should be, compared to the models obtained from the DNV GL Customer Management Module.

Staff also notes that the Company's per-customer consumption model is obtained using the consumption of existing customers, and may not properly account for decreased consumption that may be attributable to either updated efficiency standards in new building codes, or to the Company's own energy efficiency programs. As noted by the Company, there is substantial downward pressure on actual per-customer consumption due to changes in building codes and to the Company's energy efficiency programs. *Id.* at 31. In the future, Staff believes that the Company should quantify the effects of new building codes and the Company's energy efficiency programs and incorporate estimates into its per customer usage models.

Deficits and Regional Summaries

Over the IRP planning period, the Company shows that deficits are projected in five key parts of its service territory 1) the Idaho Falls Lateral, 2) Sun Valley Lateral, 3) Canyon County Area, 4) State Street Lateral, and 5) the Central Ada County area during the 2019 – 2023 IRP period. *Id.* at 95 – 97.

In previous IRPs, the Company included future enhancements as existing peak firm day delivery capability. Staff believes this practice obscured the magnitude and timing of potential capacity deficits and did not provide a transparent and robust method to evaluate deficit resolution. In this IRP the Company provided capacity analysis, identified when deficits will occur, and described enhancements to resolve identified deficits.

In some cases, such as the State Street Lateral and Central Ada County Area, the Company provided a discussion of alternatives considered to resolve deficits. However, in areas such as the Sun Valley Lateral and Canyon County Area, it was not clear what alternatives the Company considered and why it selected the enhancement(s) it did to resolve deficits. In the future, Staff would like to see the alternatives considered by the Company to resolve all identified deficits and an analysis that demonstrates selection of least cost, least risk solutions.

Staff recommends that the Company conduct a robust analysis of supply and demand side alternatives to resolve the deficits in a least cost, least risk manner. Without this type of analysis, Staff is unable to evaluate the reasonableness of the Company's planned resources. Requiring this level of analysis from Intermountain would align it with the IRP standards currently in place for Avista's natural gas service territory, as well as all of the Idaho-regulated electric utilities. Additionally, Staff recommends that the Company include documentation that shows all analysis conducted to determine least cost, least risk alternatives.

Idaho Falls Lateral

The Idaho Falls Lateral ("IFL") located in eastern Idaho serves cities between Pocatello on the south to St. Anthony on the north. The IFL utilizes a Liquefied Natural Gas ("LNG") facility located in Rexburg to supplement the lateral's capacity during a peak demand day. The Company trucks LNG to the Rexburg facility from its Nampa, Idaho LNG facility. Comparing peak firm day delivery capability on the IFL to peak day demand, the Company shows a deficit in 2023 under the base case scenario.

The Company plans to install a second LNG tank at the Rexburg facility in 2022. *IRP* at 129. Addition of a second storage tank should provide enough capacity to meet peak demand through 2023. *IRP* at 128. The Rexburg facility was constructed to accommodate three LNG storage tanks, one of which was built and is operational. The Company estimates that installation of an additional storage tank in the summer of 2022 will cost $3M. The Company plans to order the additional tank in 2021.

Sun Valley Lateral

The Sun Valley Lateral ("SVL") located in central Idaho serves residential, commercial, and industrial customers. The SVL is a 68-mile long, 8-inch-high pressure pipeline, with a compressor station located near Jerome, which has most of its demand furthest from its source. *Id.* at 129. Comparing peak firm day delivery capability on the SVL to peak day demand, the Company shows deficits in 2021 -2023 under the base case scenario. *Id.* at 96. The Company plans to add a second compressor station in 2021 to provide enough capacity to meet peak demand through 2023. *Id.* at 129.

Staff was concerned that the proposed compressor station would be inadequate to meet the long term needs of customers along the SVL. As described in the Application, the proposed compressor station would increase capacity from 198,780 Therms/Day to 220,000 Therms/Day, or an increase of 20,122 Therms per day. Using the Company's peak load growth estimate for the SVL (2.26%/year), Staff estimated that the Company would outgrow the new compressor station by the year 2030, and require additional infrastructure investment. *Company responses to Staff's Production Request Nos. 27 and 30.*

In its discussions with the Company, Staff learned that the IRP substantially understates the capacity increases that would be realized by the proposed compressor station and other planned improvements to the SVL. In fact, these improvements would boost capacity to between 260,000 and 300,000 therms per day. Using the Company's 2.26% growth rate to extrapolate beyond the current 5-year IRP planning horizon, Staff believes that this will be sufficient to meet any anticipated growth along the SVL until the year 2040 and beyond.

Although Staff believes that the proposed compressor station and associated improvements will be able to meet forecast load growth along the SVL, Staff has not conducted a prudency review to determine if these improvements represent the least costly way of meeting demand in this AOI ("Area of Impact").

Canyon County AOI

The Canyon County AOI located in southwest Idaho serves residential, commercial, and industrial customers from Star Road west to Highway 95. Comparing peak firm day delivery capability in the Canyon County AOI, the Company shows deficits in years 2022 through 2023 under the base case scenario. *IRP* at 96. With three enhancement projects, the Company expects to achieve enough capacity to meet peak demand through 2023. *IRP* at 127.

One enhancement project known as the Orchard Avenue Extension ("OAE") scheduled for 2020 is a six-inch steel pipeline installation project 4.5 miles in length. The project will deliver high pressure gas to a rapidly growing area on the Company's system at an estimated cost of $2.3M.

An additional project known as the Ustick Caldwell Phase Two enhancement involves replacing two miles of six-inch steel high pressure pipeline with twelve-inch steel high pressure pipeline. The Company determined that installation of a twelve inch pipeline is the more cost-effective alternative on a per therm basis. The Company estimates project costs to be $2.7M to $3.1M and will complete a final design and cost estimate this year with construction completion targeted for 2021.

The final Canyon County project is known as the Happy Valley extension. This enhancement includes an eight-inch steel pipeline installation project that is 2 miles in length. The project is like the OAE in that it will deliver high pressure gas into a growth area. The project is targeted to be completed in 2022 at an estimated cost of $1.8M.

Although the OAE and Happy Valley pipeline installations should meet projected demand, the Company did not conduct a robust analysis of other supply and demand-side options that may have met these needs at lesser cost and risk.

State Street Lateral

The State Street Lateral ("SSL") located in southwest Idaho serves primarily residential and commercial customers in the Star, Eagle, Meridian, and northwest Boise areas. Comparing peak firm day delivery capability in the SSL, the Company shows a deficit in 2023 under the base case scenario. *IRP* at 97. With an enhancement, the Company expects to have enough capacity to meet peak demand through 2023. *IRP* at 125.

An enhancement project known as the Phase II State Street pipeline retest is an enhancement that will increase operating pressure on an additional three miles of twelve-inch pipeline. The project is targeted for completion in 2022 at an estimated cost of $1.5M. As an alternative to the retest, the Company considered installation of new pipeline and determined that it would cost approximately three times more than the chosen course of action.

Central Ada County AOI

The Central Ada County AOI located in southwest Idaho serves primarily the Boise area. Comparing peak firm-day delivery capability in the Central Ada County AOI, the Company shows deficits in 2022 through 2023 under the base case scenario. *IRP* at 97. With an enhancement, the Company expects to have enough capacity to meet peak demand through 2023. *IRP* at 126. An enhancement project known as the "Central Ada County 10" Victory retest is a project that will increase operating pressure on an additional 2.5 miles of ten-inch pipeline. The project is targeted for completion in 2021 at an estimated cost of $2M. As an alternative to the retest, the Company considered installation of new twelve-inch pipeline and determined that it would not be cost- effective being approximately $1.75 to $3M more expensive than the chosen course of action.

Supply Options

The Company's service territory is located between the Western Canadian Sedimentary Basin ("WCSB") located in Alberta and British Columbia and the Rockies region located in Wyoming, Colorado, and Utah. A bi-directional interstate pipeline operated by Northwest Pipeline runs through the Company's territory and enables purchases from both regions. The WCSB supplies approximately 79% of the Company's natural gas. *IRP* at 44.

The Company utilizes storage as a capacity resource. Currently, the Company has storage capacity in four facilities. Two of the facilities are operated by Northwest Pipeline in Jackson Prairie and Plymouth Washington. A third facility is the Dominion Energy storage field located near the Utah and Wyoming border. The fourth storage facility is the Company-owned Nampa LNG facility, which is described in greater detail below.

Nampa LNG Facility

In addition to reviewing planned enhancement projects, Staff also examined the operation of the Company's Nampa LNG facility. In its IRP, the Company states that "… the plant has the added benefit of supplying natural gas directly into the connected Canyon County and Ada County distribution systems without use of interstate pipeline distribution." *Id.* at 56.

Using information provided by the Company, Staff found that liquified natural gas stored at the Nampa LNG facility could be used to augment flow from the Williams Pipeline in order to meet a needle peaking event on the Canyon County Lateral; however, Staff also believes that in the event of a Force Majeure event curtailing flow from the Williams Pipeline, the Nampa LNG facility would probably be unable to maintain adequate system pressure in the Canyon County lateral by itself. Staff notes that there are no connections to other portions of the Company's system that would allow gas produced by the Nampa LNG facility to augment flow to any portion of the Company's distribution system except for the Canyon County Lateral.

In past IRP cycles, the Company has stated that liquefaction is an efficient method for storing peak requirements, that the Nampa LNG facility could be used to meet needle peaking events, and that it could be used as an emergency source of supply during a force majeure situation. *Intermountain Gas 2017 IRP at 56 and 107.* However, the Company declined to provide Staff with the information necessary to evaluate these claims in those cases. *INT-G-17-04 Company Response to Staff's Production Request Nos. 22 and 23 and Staff's Comments at 7 and 8.* In the current IRP cycle, the Company provided all information requested by Staff, and Staff was able to evaluate claims made by the Company in this and previous IRP cycles. Staff notes that in its current IRP, the Company states that LNG is a costly method for meeting peak demand.

During off-peak months, the Nampa LNG facility obtains pressurized natural gas from the Canyon County lateral, liquifies it, and then stores it in a large steel storage tank with a capacity equivalent to 600 million standard cubic feet of gas (about 600,000 Dth). The liquified gas is withdrawn to supply the Company's non-utility customers, and during winter months, liquified natural gas is trucked from the Nampa LNG facility to the Company's gasification facilities along the Idaho Falls Lateral. Staff notes that natural gas liquification is an energy intensive process, and that using liquified natural gas to meet demand during ordinary needle peaking events would be very costly. According to the Company, the compressors used in the liquification process consume one unit of natural gas for every three to four units that are liquefied. *Id.* at 54. According to the Company, except for gas consumed during periodic maintenance and training events, no gas has ever been supplied by the Nampa LNG facility to the Canyon County lateral to meet normal demand, needle peak demand, or emergency needs (Response to Staff's PR Nos. 25 and 31). Staff notes, however, that gas trucked from the Nampa LNG facility to the Company's degasification facilities along the Idaho Falls lateral is essential for meeting that lateral's needle peak demand. Additionally, the Nampa LNG facility had supplied liquefied natural gas to the needs of a small Wyoming gas utility that had lost its supply in January, 2013 *Intermountain Gas 2017 IRP at 107*.

The Company's non-utility LNG sales continue to grow and could possibly reach a point where annual liquefaction levels are maximized. The Company's LNG sales or margins could be at risk if new commercial LNG facilities with lower operating costs are built in the region. The Company mentions that additional LNG storage is not likely needed but liquefaction capabilities may require expansion to increase daily production of LNG if sales increase. *Id.* at 140.

Demand Side Management ("DSM")

Although it is not required by Commission Order, Staff previously recommended that this IRP should include a more robust analysis of DSM resources, including a modeling process by which DSM measures are selected based on cost-effectiveness, an explanation and update of avoided costs, and the impact of DSM on supply and capacity needs. The Company acted on Staff's recommendations to strengthen its DSM analysis and contracted with Dunsky Energy Consulting to perform a Conservation Potential Assessment ("CPA"). *Exhibit 4.* Importantly, this CPA included an analysis of residential and commercial measures, which should lend itself to a more robust DSM portfolio in the future. Additionally, the Company modeled DSM as a supply resource starting in 2020. Staff believes that the Company in cooperation with its Energy

Efficiency ("EE") stakeholder group is addressing concerns Staff detailed in previous IRPs and is actively pursuing compliance with Commission orders.

Improvements from Previous IRPs

Avoided Cost

In Intermountain's 2015 IRP case, the Commission directed the Company to include more detail in future IRPs about how the Company calculates avoided costs and uses those calculations to determine whether natural gas DSM opportunities are or are not cost-effective. *See* Order No. 33314. In Intermountain's 2017 IRP case, the Commission directed the Company to describe how avoided costs change because of the IRP. *See* Order No. 33997.

Upon initial analysis of energy efficiency and avoided cost content in the 2019 IRP, Staff believes that the Company considered DSM/EE in its IRP modeling, specifically in its optimization model. However, Staff has concerns with the Company's avoided cost methodology and believes that base rate embedded distribution costs are inappropriately included in its avoided cost computations. Additionally, Staff believes the Company's forecast of avoided commodity costs is unreasonably high. Staff looks forward to working with the Company's EE stakeholder group in refining the avoided cost calculation as ordered in Commission Order No. 34536.

Public Participation

In Intermountain's 2017 IRP case, the Commission directed the Company to convene an IRP advisory group and work with it to develop future IRPs that comprehensively and transparently consider demand, existing resources, and potential supply and demand-side options for meeting any deficits. *See* Order No. 33997.

The Company established the Intermountain Gas Resource Advisory Committee ("IGRAC"). *Id*. at 3. The intent of IGRAC is to provide a forum through which public participation can occur as the IRP is developed. *Id*. Advisory committee members were solicited from across Intermountain's service territory as representatives of the communities served by the Company. *Id.* Intermountain states it held meetings across its service territory. The Company held three IGRAC meetings in multiple locations to facilitate committee member and public participation. The Company states it provided a comment period after each meeting to ensure feedback was timely and could be incorporated into the IRP. *Id*. Staff members attended each of the meetings. Staff recognizes the Company's efforts to enhance public participation, appreciates the opportunity to participate in the IGRAC, and looks forward increased public involvement in future IRPs.

Lost and Unaccounted for Gas ("LAUF")

In Order No. 32855, the Commission directed the Company to describe how LAUF is managed and explain how those results were achieved. The Commission permits the Company to recover a maximum of 0.85% of its total throughput as LAUF.[3] The Company's IRP reports that its three-year average LAUF rate of 0.1176% is one of the best in the industry and details how those results were achieved. *Id.* at 67. Staff recognizes the Company's improvement in this area and believes the Commission requirements were satisfied in this filing.[4] Staff scrutinizes LAUF in the Company's annual PGA filings.

Conclusion

The Company's IRP analyzed residential, commercial, and industrial customer growth and its impact on the Company's system under multiple scenarios. The IRP results show that there are no peak day delivery deficits when forecasted peak day send-out is matched against existing and planned resources for the 2019 through 2023 IRP period. However, as previously mentioned, deficits exist if the planned resource enhancements are not included.

STAFF RECOMMENDATIONS

Staff believes the Company's IRP has met the Commission requirements and recommends the Commission acknowledge the Company's 2019-2023 IRP. To improve future IRPs, Staff also recommends that the Company:

1) Include an analysis of all options the Company considered to resolve identified deficits and achieve the most cost-effective least risk solutions; and

[3] Order No. 30649

[4] Order No. 32855 ("IT IS FURTHER ORDERED that the Company shall discontinue its semi-annual LAUF gas reports. The Company shall include an exhibit in its PGA summarizing the statistics that have historically been reported in its LAUF semi-annual reports. Further, in future IRPs, the Company shall include a LAUF gas section that contains the information referenced above.")

2) Validate the peak consumption estimates obtained from DNV GL's Customer Management Module using actual peak information from the Company's AMI meters.

Respectfully submitted this 23rd day of April 2020.

John R. Hammond, Jr.
Deputy Attorney General

Technical Staff: Kevin Keyt
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 23rd DAY OF APRIL 2020, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF,** IN CASE NO. INT-G-19-07, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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