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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE ANNUAL)	
UPDATE TO "SURROGATE AVOIDED)	CASE NO. GNR-E-20-01
RESOURCE" AVOIDED COST RATES)	
)	COMMENTS OF IDAHO POWER
)	COMPANY
)	
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)	
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Idaho Power Company ("Idaho Power" or "Company"), in accordance with RP 201, *et seq.*, and the applicable provisions of the Public Utility Regulatory Policies Act of 1978 ("PURPA"), as well as the Idaho Public Utilities Commission's ("IPUC" or "Commission") Notice of Modified Procedure in this matter, Order No. 34628, hereby respectfully submits the following Comments.

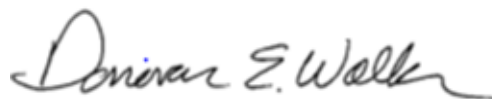
On April 14, 2020, Commission Staff presented a Decision Memo at the Commission's regular Decision Meeting recommending the Commission utilize a more formal process to update natural gas price forecasts for the Surrogate Avoided Resource ("SAR") avoided cost methodology. The Commission utilizes the SAR methodology as

the source of published avoided cost prices available to PURPA qualifying facilities under the Commission's jurisdiction and subject to the State of Idaho's implementation of PURPA.

The Commission approved Staff's recommendation to formalize the annual update to the SAR avoided cost methodology going forward, and clarified that, "...this update is still intended to be a simple arithmetic calculation to an established methodology". See Order No. 34628.

The Company has reviewed the information and the SAR model provided by Staff in the case file including Staff's updates to the methodology in accordance with Commission Order No. 32697 and 32802, specifically the update to include the Energy Information Administration's ("EIA") natural gas forecast published on January 29, 2020. Idaho Power believes the natural gas forecast utilized by Staff has been correctly updated in the model and agrees that the calculations for the Company are consistent with the SAR methodology approved by the Commission.

Respectfully submitted this 7th day of May, 2020.



DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of May, 2020, I served a true and correct copy of the within and foregoing COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

Commission Secretary
Idaho Public Utilities Commission
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Christy Davenport, Legal Assistant