

November 22, 2017

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2017 NOV 24 AM 9:08

Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

IDAHO PUBLIC
UTILITIES COMMISSION

Dear PUC commissioners and staff,

Regarding case No. IPC-E-17-11

Idaho Power states on page 89 of their 2017 IRP that the Levelized Cost of Energy for Solar PV- Utility –Scale 1-Axis Tracking (30MW) is \$74 per megawatt hour.

This feels too high to me for the following reasons:

1) In Lazard's Levelized Cost of Energy Analysis- Version 10.0 dated December 2016, the range of Solar PV- crystalline Utility Scale is \$49 to \$61 per MWh and the range of Solar PV- Thin Film Utility Scale is \$46 to \$56 per MWh.

2) For at least the past three years Power Purchase Agreements for utility-scale solar PV have been signed for less than \$50 per MWh. For example:

-Austin Energy signed a PPA with Recurrent Energy for just below \$50 per MWh (reported in Greentech Media, May 16, 2014)

-Nevada Energy signed a solar PV Power Purchase Agreement for \$38.7 per MWh (reported in EcoWatch, July 17, 2015)

-Dubai Electricity and Water Authority signed a PPA for solar PV for \$29.9 per MWh (reported in Cleantechnica, December 5, 2016)

-In Saudi Arabia a bid came in at \$17.9 per MWh (reported in RenewEconomy October 6, 2017)

If Idaho Power's 2017 IRP is to have value it needs to reflect prices in the real world. This IRP does not report accurate solar photovoltaic prices and this undermines the believability of the entire IRP.

Please instruct Idaho Power to be accurate when they report levelized cost of energy (LOCE).

Thank you.



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