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UTILITIES COMMISSION

**DONOVAN E. WALKER**  
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January 31, 2012

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. GNR-E-11-03  
*IN THE MATTER OF THE COMMISSION'S REVIEW OF PURPA QF  
CONTRACT PROVISIONS INCLUDING THE SURROGATE AVOIDED  
RESOURCE (SAR) AND INTEGRATED RESOURCE PLANNING (IRP)  
METHODOLOGIES FOR CALCULATING PUBLISHED AVOIDED COST  
RATES*

Dear Ms. Jewell:

Enclosed for filing are nine (9) copies of the testimonies and exhibits of Lisa A. Grow, M. Mark Stokes, Tessia Park, William H. Hieronymus, and Karl Bokenkamp. One copy of each of the aforementioned testimonies has been designated as the "Reporter's Copy." A disk containing Word versions of the testimonies is enclosed for the Reporter.

In addition, nine (9) copies of the confidential portions of Exhibit No. 7 have been included in a separate envelope. Please handle the confidential information in accordance with the Protective Agreement in this matter.

Very truly yours,

Donovan E. Walker

DEW:csb  
Enclosures

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IDAHO PUBLIC  
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S )  
REVIEW OF PURPA OF CONTRACT )  
PROVISIONS INCLUDING THE SURROGATE ) CASE NO. GNR-E-11-03  
AVOIDED RESOURCE (SAR) AND )  
INTEGRATED RESOURCE PLANNING (IRP) )  
METHODOLOGIES FOR CALCULATING )  
PUBLISHED AVOIDED COST RATES. )  
\_\_\_\_\_ )

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

LISA A. GROW

1 Q. Please state your name and business address.

2 A. My name is Lisa A. Grow and my business  
3 address is 1221 West Idaho Street, Boise, Idaho 83702.

4 Q. By whom are you employed and in what capacity?

5 A. I am employed by Idaho Power Company ("Idaho  
6 Power" or "Company") as the Senior Vice President of Power  
7 Supply.

8 Q. Please describe your educational background  
9 and work experience with Idaho Power.

10 A. I graduated from the University of Idaho in  
11 1987 with a Bachelor of Science degree in electrical  
12 engineering. I received an Executive Masters of Business  
13 Administration from Boise State University in 2008. I  
14 began my career at Idaho Power after graduating from the  
15 University of Idaho in 1987, and have held several  
16 engineering positions before moving into management in  
17 2005. In 2005, I was named Vice President of Delivery  
18 Engineering and Operations. In 2009, I was appointed to my  
19 current position as Senior Vice President of Power Supply.  
20 My current responsibilities include overseeing the  
21 operation and maintenance of Idaho Power's generation  
22 fleet, power plant engineering and construction,  
23 environmental affairs, water management, power supply  
24 planning, and wholesale electricity and gas operations.

25

1 Q. What is the purpose of your testimony in this  
2 matter?

3 A. The purpose of my testimony is to present the  
4 Company's requests to modify the Idaho Public Utilities  
5 Commission's ("Commission") implementation of the Public  
6 Utility Regulatory Policies Act of 1978 ("PURPA") as it is  
7 applied in the state of Idaho and more particularly to  
8 Idaho Power. I will provide an overview of the Company's  
9 case and summarize the major points contained in the  
10 testimony of the Company's witnesses.

11 **I. INTRODUCTION**

12 Q. What has the Commission stated with regard to  
13 the purpose and/or scope of the present proceeding?

14 A. In its order maintaining the 100 kilowatt  
15 ("kW") published rate eligibility cap for wind and solar  
16 Qualified Facilities ("QF"), Case No. GNR-E-11-01, the  
17 Commission stated that it was initiating "additional  
18 proceedings to allow the parties to investigate and analyze  
19 both the SAR Methodology and the IRP Methodology" and that  
20 "we [the Commission] encourage a full examination of the  
21 application of the IRP Methodology and are open to  
22 considering alternatives to the current methodologies."  
23 Order No. 32262, pp. 8-9.

24 Additionally, in its Notice of Review for this  
25 matter, Case No. GNR-E-11-03, the Commission further

1 directed that this proceeding investigate and review the  
2 methodologies for calculating avoided cost rates for QFs  
3 pursuant to PURPA. Order No. 32352. With regard to the  
4 investigation and scope of this particular proceeding, the  
5 Commission further stated that it, "seeks information  
6 regarding the appropriateness of both the SAR and IRP-based  
7 avoided cost methodologies. Specifically, the calculation  
8 of avoided cost rates, for both published and negotiated  
9 contracts, is being re-examined." *Id.*, p. 4.  
10 Additionally, "the Commission anticipates that the scope of  
11 this inquiry will also include (but is not limited to)  
12 considerations regarding the dispatchability of varying  
13 resources, curtailment options, integration costs,  
14 renewable energy credits, delay security and liquidated  
15 damages, timing and schedule of negotiations, and contract  
16 milestones." *Id.*

17 Q. Is this matter also referred to as "Phase III"  
18 of the PURPA avoided cost rate proceedings that were  
19 initiated in November 2010?

20 A. Yes. This is considered Phase III of those  
21 proceedings.

22 Q. Could you summarize Phase I and Phase II of  
23 these proceedings?

24 A. Yes. Phase I began when Idaho Power, Avista,  
25 and Rocky Mountain Power filed a Joint Petition on November

1 5, 2010, in Case No. GNR-E-10-04, requesting the Commission  
2 initiate an investigation to address various avoided cost  
3 issues related to the implementation of PURPA in Idaho.  
4 The utilities were experiencing numerous requests for PURPA  
5 contracts from large, utility-scale projects that were  
6 being disaggregated in order to take advantage of the  
7 published rates only available to smaller projects. The  
8 utilities requested that the Commission immediately lower  
9 the eligibility cap from 10 average megawatts to 100 kW  
10 during the investigation.

11 On December 3, 2010, the Commission declined to  
12 lower the eligibility cap immediately and set a schedule to  
13 process the Joint Petition through Modified Procedure and  
14 oral arguments. Order No. 32131. The Commission also  
15 directed that if a decision to lower the cap was made, it  
16 would be effective as of December 14, 2010.

17 In Order No. 32176, issued on February 7, 2011, the  
18 Commission granted part of the request by lowering the  
19 eligibility cap for wind and solar projects to 100 kW, but  
20 the cap for other resource types remained unchanged. The  
21 order also directed the parties to meet within 10 days to  
22 establish a schedule for Phase II which would address the  
23 disaggregation issue.

24 Commission Order No. 32195 established a schedule  
25 for Phase II, in Case No. GNR-E-11-01, which culminated

1 with a Technical Hearing the week of May 9, 2011. The  
2 Commission also directed the parties to provide information  
3 regarding how small wind and solar QFs could continue to  
4 have access to published avoided cost rates without  
5 allowing large QFs to obtain a rate that does not  
6 accurately reflect a utility's avoided cost. In Order No.  
7 32262, issued on June 8, 2011, the Commission determined  
8 that the published rate eligibility cap for wind and solar  
9 QFs would remain at 100 kW, and the Commission would  
10 undertake a more detailed examination of the methodologies  
11 used to set avoided cost rates. Order No. 32262 also  
12 directed the parties to meet to establish an issues list  
13 and a schedule for Phase III, which is this present case,  
14 GNR-E-11-03.

15 **II. CASE STRUCTURE AND WITNESS SUMMARY**

16 Q. Could you please provide an overview of Idaho  
17 Power's case and summarize the testimony of the Company's  
18 witnesses?

19 A. Yes. The next witness for the Company is M.  
20 Mark Stokes, Manager of Power Supply Planning. Mr. Stokes  
21 describes the current status of PURPA QF projects on Idaho  
22 Power's system, as well as the current implementation of  
23 both the Surrogate Avoided Resource- ("SAR") and Integrated  
24 Resource Plan- ("IRP") based avoided cost methodologies in  
25 Idaho. He also addresses issues related to risk and harm

1 to Idaho Power customers, contract term, contracting  
2 process, and presents the Company's proposal to utilize the  
3 IRP-based methodology for establishing the avoided cost for  
4 all PURPA QF projects, and for both published and  
5 negotiated rates.

6 Q. Does the Company present any testimony  
7 regarding utility operations?

8 A. Yes. Tessia Park, Load Serving Operations  
9 Director, presents testimony regarding utility operations  
10 with regard to PURPA QFs and the Company's requirements to  
11 reliably serve load. Ms. Park provides testimony regarding  
12 the economic dispatch of Idaho Power's resources, and how  
13 economic dispatch decisions come in to play when  
14 incorporating PURPA QF generation into Idaho Power's  
15 system. Ms. Park discusses the requirements of federal  
16 regulations, particularly 18 C.F.R. § 292.304, and how they  
17 interact with certain light load operational situations on  
18 the Company's system. Ms. Park explains and presents the  
19 Company's proposed new Tariff Schedule 74 which sets forth  
20 an authorized curtailment policy and procedure for PURPA QF  
21 generation pursuant to 18 C.F.R. § 292.304(f).

22 Q. Does the Company have any other witnesses?

23 A. Yes. The Company engaged an outside  
24 consulting firm, Charles Rivers & Associates, to evaluate  
25 Idaho Power's system, the current implementation of PURPA

1 QF requirements in the state of Idaho, the current avoided  
2 cost methodologies employed by the Commission, and other  
3 PURPA related issues relevant to this proceeding. Mr.  
4 William Hieronymus from Charles Rivers & Associates  
5 discusses the history and origins of PURPA requirements and  
6 the implementation of those requirements in various  
7 jurisdictions. Mr. Hieronymus also presents various  
8 methods that have been utilized across the country to  
9 calculate and establish avoided cost rates and prices  
10 pursuant to PURPA. He also discusses issues related to the  
11 allocation of risk in PURPA QF transactions such as pricing  
12 and contract term. Finally, Mr. Hieronymus discusses the  
13 avoided cost methodology employed in the state of Idaho and  
14 discusses Idaho Power's proposed revisions to the  
15 methodology presented in this case.

16 Q. Does Idaho Power propose any changes to the  
17 avoided cost methodologies?

18 A. The Company's final witness to provide direct  
19 testimony is Karl Bokenkamp, Power Supply's Director of  
20 Operations Strategy. He provides testimony setting forth  
21 the Company's proposed changes, or modifications, that  
22 Idaho Power requests for the implementation of the IRP  
23 methodology.

24

25

1 **III. CASE SUMMARY**

2 Q. What are Idaho Power's major concerns in this  
3 case?

4 A. Idaho Power is deeply concerned about the  
5 negative economic impact caused by the implementation of  
6 PURPA and its requirements, as well as the detrimental  
7 effect that the accumulated and continuing addition of  
8 PURPA QF generation is having on Idaho Power's system and  
9 operations. The economic ramifications are extremely  
10 harmful to customers. Idaho Power is very concerned that  
11 the avoided cost methodologies approved by the Commission  
12 have become disconnected from federal requirements and the  
13 definition of avoided cost. This has resulted in an  
14 environment that has fostered rapid and uncontrolled  
15 development of QF generation projects that are causing  
16 substantial harm to Idaho Power customers by greatly  
17 inflating power supply costs while at the same time  
18 degrading the reliability of the system.

19 Idaho Power's main concern is that the Company is  
20 obligated to take a very large amount of generation that it  
21 does not need and is not valuable to its operations, while  
22 at the same time paying more for it than other generation  
23 or market purchases that are available to serve load. The  
24 Company is also very concerned about the very large and  
25 dramatic increase in power supply costs that must be borne

1 by customers because of the mandatory QF purchases that  
2 cost more than the Company's own generation or alternative  
3 purchases. Idaho Power desires that the requirements of  
4 PURPA continue to be met, but also wants to ensure that  
5 Idaho Power's requirements of providing safe, reliable, and  
6 low cost power to its customers is not undermined in doing  
7 so.

8 Q. What does Idaho Power see as problems with the  
9 current implementation of PURPA?

10 A. Several things: (1) The continuing and  
11 unchecked requirement for the Company to acquire QF  
12 generation, pursuant to avoided cost rates, with no regard  
13 for the Company's need for additional generation on its  
14 system, nor the availability of other lower cost resources,  
15 and in a manner inconsistent with the federal definition of  
16 avoided cost; (2) Circumvention of the Company's required  
17 IRP planning process and a continuing requirement to  
18 acquire generation outside of that established process that  
19 inflates customers' power supply costs; (3) System  
20 reliability and other operational issues caused by a rapid  
21 and large scale increase in intermittent and unreliable  
22 generation sources; and (4) Most importantly, a dramatic  
23 increase in the price that Idaho Power's customers must pay  
24 for their energy needs as a direct result of the large  
25 quantities of additional QF generation at prices in excess

1 of the Company's avoided cost, and beyond that which would  
2 otherwise be considered prudent.

3           These items are discussed in more detail in the  
4 direct testimony of Mr. Stokes.

5           Q.       How does the large increase in PURPA  
6 generation affect Idaho Power's customers?

7           A.       Customers pay 100 percent of PURPA power  
8 supply costs in the annual Power Cost Adjustment ("PCA").  
9 These costs, while never insignificant, were relatively  
10 small and stable from 1982, when the first QF projects were  
11 connected to the Company's system, until about 2003. Since  
12 2004, PURPA expense has grown dramatically, and customers  
13 will see very significant annual rate increases out to 2026  
14 based upon the current QF projects that are currently  
15 generating, and those that have approved power sales  
16 agreements to date. As shown in more detail in the  
17 testimony of Mr. Stokes, annual PURPA power supply expenses  
18 in 2004 were approximately \$40 million. It took more than  
19 20 years of accumulation of annual PURPA expense to amount  
20 to the 2004 one-year magnitude of cost. Just five years  
21 later, by 2009, that amount grew by 50 percent to  
22 approximately \$60 million. Just another three years after  
23 that, in 2012, that \$60 million will double to \$120 million  
24 of annual PURPA power supply costs. That number increases  
25 to \$167 million by 2014, and by 2026, will be \$186 million

1 annually, an approximate 465 percent increase in costs from  
2 2004. This will result in dramatic annual rate increases  
3 for all of Idaho Power's customers.

4 Q. Please summarize the Company's requested  
5 relief in this case.

6 A. The Company has conducted a comprehensive  
7 examination of the process by which the Commission  
8 implements the requirements of PURPA and PURPA's  
9 corresponding Federal Energy Regulatory Commission  
10 regulations. Idaho Power's testimony summarizes the  
11 current procedures and methodologies that are in place, and  
12 requests changes in several areas. The Company  
13 demonstrates through testimony how its proposed changes  
14 both comply with the federal requirements of PURPA, and  
15 address severe problems with the current implementation of  
16 PURPA. If left unaddressed, the current problems  
17 associated with the implementation of PURPA will continue  
18 to unnecessarily inflate the power supply costs of its  
19 customers and to degrade the reliability of Idaho Power's  
20 system.

21 To address the current and potential economic harm  
22 to Idaho Power customers as a result of continuing to add  
23 large amounts of unneeded generation to its system at a  
24 high cost, Idaho Power requests first, that all PURPA QF  
25 avoided costs be calculated using an IRP-based avoided cost

1 methodology. This is a large step in the right direction  
2 to more closely estimate Idaho Power's avoided cost - the  
3 incremental cost that the utility would incur, either by  
4 generating the power itself or purchasing it from another  
5 source, but for the purchase from the QF. This is also a  
6 step in the right direction to better ensure that Idaho  
7 Power customers remain neutral as to whether the power was  
8 purchased from a QF or otherwise acquired by the utility,  
9 as is required by federal law. It also starts to bring  
10 some aspects of utility need into the determination of  
11 avoided cost prices.

12           Second, the Company requests approval and  
13 implementation of a standard contracting and negotiation  
14 process by which PURPA QFs can obtain a Power Purchase  
15 Agreement ("PPA") with Idaho Power in a completely  
16 transparent process that provides certainty to both  
17 parties, better defines the parties' obligations, and  
18 addresses issues frequently brought before the Commission  
19 in the form of "grandfathering" requests.

20           Third, to mitigate and reduce the risk born entirely  
21 by Idaho Power customers associated with long-term power  
22 purchase commitments at a fixed price or rate, Idaho Power  
23 requests a reduction in the maximum authorized PPA contract  
24 term from its present term of 20 years to a maximum of five  
25 years.

1           To ensure that customers are not harmed by the  
2 purchase of power from the QF, and that the Company's lower  
3 cost base load resources are being optimized and used to  
4 cost-effectively serve customers when available, the  
5 Company requests approval of a new Tariff Schedule 74.  
6 This Tariff Schedule sets forth the authorized curtailment  
7 policy and procedure for PURPA QF generation pursuant to 18  
8 C.F.R. § 292.304(f).

9           Lastly, the Company seeks certain modifications to  
10 the currently approved IRP-based avoided cost pricing  
11 methodology in order to better estimate Idaho Power's  
12 avoided cost, and to align the methodology with the  
13 definition of avoided cost from federal law. This request  
14 is essentially a modification to the present implementation  
15 of the IRP-based methodology that better aligns the  
16 methodology with the definition of avoided cost from  
17 federal regulations.

18           Q.     You stated earlier that the Commission  
19 mentioned renewable energy credits ("RECs") in a list of  
20 possible issues in Order No. 32352. Does the Company have  
21 a proposal as part of this case regarding RECs?

22           A.     Issues related to PURPA QFs and RECs are  
23 currently being litigated by the Company before the  
24 Commission in Case No. IPC-E-11-15. The Commission has had  
25 proceedings in the past regarding issues related to the

1 ownership of RECs between PURPA QFs and the purchasing  
2 utility, but the issue of ownership of RECs in the state of  
3 Idaho remains an unsettled issue. Idaho Power understands  
4 that the Idaho Legislature, which is currently in session,  
5 may be considering proposed legislation that would address  
6 the ownership of RECs from PURPA QF projects, and thus the  
7 Company has no specific request of the Commission in this  
8 regard at this time.

9 Q. Please detail the specific approval the  
10 Company is requesting from the Commission.

11 A. The Company requests specific Commission  
12 approval of the following:

13 1. The use of an IRP-based methodology for  
14 establishing avoided cost rates for all PURPA QF projects;

15 2. Establishment of a Commission-  
16 authorized negotiation process and procedure by which a  
17 PURPA QF can obtain a PPA with Idaho Power;

18 3. A reduction in the maximum term for  
19 PURPA QF PPAs from 20 years to five years;

20 4. The Company's proposed Tariff Schedule  
21 74 setting forth the Company's authorized curtailment  
22 policy and procedure for PURPA QF generation pursuant to 18  
23 C.F.R. § 292.304(f); and

24 5. The Company's proposed modifications to  
25 the previously approved IRP-based avoided cost methodology.

1           The Company believes that these determinations can  
2 reasonably be made based upon the full and detailed  
3 testimony provided by the Company in this case.

4           Q.       Is it your opinion that the granting of the  
5 requested relief proposed by the Company is in the public  
6 interest?

7           A.       Yes.   The great advantages that Idaho Power  
8 customers, its service territory, and its region enjoy from  
9 consistently having among the very lowest electricity  
10 prices in the nation are being eroded by a flood of QF  
11 generation that we all are paying too much for.  Idaho  
12 Power is forced to purchase this power with no regard to  
13 whether it is needed on its system, with no regard to  
14 whether it is called for in the Company's IRP process, and  
15 with no regard to whether there are other lower cost  
16 alternatives for its customers.  Additionally, the Company  
17 is forced to deal with the difficult tasks and problems  
18 associated with integrating large amounts of intermittent  
19 and variable renewable generation into its system, once  
20 again with customers paying the resulting price.  In most  
21 instances, customers do not even get the "benefits" derived  
22 from the renewable attributes of that generation in the  
23 form of RECs, nor is the Company even able to "claim" or  
24 get credit for the existence of that renewable energy on  
25 its system.

1           In this proceeding we have the unique opportunity to  
2 re-examine the appropriateness of the methodologies used to  
3 set avoided cost, and to re-examine the way that the state  
4 of Idaho implements the federal requirements of PURPA.  
5 Idaho Power is deeply affected by these determinations, as  
6 are its customers, and has proposed reasoned and rational  
7 solutions to both ensure that the requirements of PURPA  
8 continue to be met, but also that Idaho Power's  
9 requirements of providing safe, reliable, and low cost  
10 power to its customers is not undermined in doing so. The  
11 Company's proposals are in the public interest, comply with  
12 federal requirements, and the Company respectfully asks the  
13 Commission to implement the same.

14           Q.     Does that conclude your testimony?

15           A.     Yes, it does.

16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31<sup>st</sup> day of January 2012 I served a true and correct copy of the DIRECT TESTIMONY OF LISA A. GROW upon the following named parties by the method indicated below:

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