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March 25, 2013

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
PURPA SAR and IRP Methodologies – Idaho Power Company's Comments
on Reconsideration

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Comments on Reconsideration.

Very truly yours,

Donovan E. Walker

DEW:csb
Enclosures

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S)
REVIEW OF PURPA QF CONTRACT) CASE NO. GNR-E-11-03
PROVISIONS INCLUDING THE)
SURROGATE AVOIDED RESOURCE) IDAHO POWER COMPANY'S
(SAR) AND INTEGRATED RESOURCE) COMMENTS ON
PLANING (IRP) METHODOLOGIES FOR) RECONSIDERATION
CALCULATING AVOIDED COST RATES.)
_____)

Idaho Power Company ("Idaho Power" or "Company") hereby respectfully submits to the Idaho Public Utilities Commission ("Commission") its Comments on the reconsideration of the Canal Drop Hydro definition and the resource-specific capacity factors of the SAR methodology for Canal Drop Hydro and the Other categories. Avista Corporation ("Avista") has reviewed these Comments, and while the basis contained herein is specific to Idaho Power's system, Avista has authorized Idaho Power to represent that Avista supports Idaho Power's proposed revisions to the definition of Canal Drop Hydro.

I. INTRODUCTION

On February 5, 2013, the Commission issued its Order on Reconsideration in the above-captioned case. Order No. 32737. This Order was a final order as to some

issues, and either granted or denied reconsideration and clarification as to some issues. With regard to the issues raised on reconsideration and clarification regarding Canal Drop Hydro and the resource-specific capacity factors utilized in the SAR methodology, the Commission directed the parties to file comments by March 25, 2013, and reply comments by April 8, 2013. The Commission found:

After reviewing the arguments presented by the parties, we grant reconsideration of the canal drop hydro issues raised. We also grant reconsideration/clarification regarding the capacity factor utilized in the SAR model for "other" projects. Canal drop hydro has a separate, higher, set of rates because irrigation-related projects provide capacity when the utility most needs it — during the peak hours of the peak days of the year (i.e., during the summer season). The issues surrounding the definition of canal drop hydro and resource specific capacity factors were not explored at hearing. The parties focused on other issues. Therefore, we find it appropriate to grant reconsideration to allow for discovery and comments on the narrow issues of: (1) definition of canal drop hydro, and (2) capacity factors as they relate to "canal drop hydro" projects and "other" projects under the SAR methodology.

Order No. 32737 at pp. 3-4.

As more fully explained below, Idaho Power proposes that the Commission adopt changes to the definition of Canal Drop Hydro that bases the definition upon the hydro projects' delivery of energy during peak summer load. Idaho Power also proposes the use of a different resource-specific capacity factor for Canal Drop Hydro that is based upon actual data from projects on Idaho Power's system and a resource-specific capacity factor for Other that is based upon the Northwest Power and Conservation Council's forced outage data. NPCC, 6th Northwest Power Plan, Appendix I.

II. DEFINITION OF CANAL DROP HYDRO

In Final Order No. 32697, the Commission established a system of SAR-based published avoided cost rates that incorporate a resource-specific capacity factor in the differentiation of published rates by resource type. In so doing, the Commission found “that implementation of a resource-specific capacity factor is an appropriate way to value when a QF is able to generate and deliver energy to a utility.” Order No. 32697 p. 15. As part of Order No. 32697, the Commission included, as Attachments A, B, and C, published avoided cost rate schedules for each utility. These published rate schedules were further updated by two subsequent Erratas to Order No. 32697 on January 2 and January 8, 2013, respectively. The published rates were divided into five resource type categorizations: Wind, Solar, Hydro, Canal Drop Hydro, and Other.

A hydroelectric based qualifying facility (“QF”), below 10 average megawatts, is eligible for one of two published avoided cost rate schedules: Hydro or Canal Drop Hydro. Because of a Canal Drop Hydro project’s capacity factor/peak time deliveries—and its corresponding reduced deliveries during non-peak times, the published rate schedule for a Canal Drop Hydro project results in much higher \$/megawatt-hour prices than a “hydro” project. The first Note on the published rate schedule for Canal Drop Hydro defines eligibility for that rate schedule as follows:

A “canal drop hydro project” is defined as a generation facility which produces the majority of its generation during the irrigation season and is located on a man-made waterway that conveys water primarily intended for irrigation or that primarily conveys irrigation return flows.

The underlying concept of having a separate rate for a Canal Drop Hydro project is not necessarily because of its source of water but the fact that it produces power that is dependable, non-intermittent, and is delivered to the utility during the utility’s peak

power consumption summer months. The approved incremental cost IRP pricing methodology does a very good job of valuing these types of seasonal peak hour power deliveries as it values the energy based on the hour in which it is delivered to Idaho Power. However, with the Commission's directive to differentiate within the SAR published avoided cost rates among different generation types based upon their capacity factor, projects that both provide most or all of their power deliveries during a utility's peak power needs, and correspondingly does not provide a lot of power deliveries during the utility's non-peak hours, receive a higher avoided cost rate, corresponding to the higher value of what they provide and, in concept, what they enable the utility to avoid. Consequently, the most important part of the definition of Canal Drop Hydro is not necessarily its source of water but when it generates and delivers energy to Idaho Power. The definition references the source of water because that is typically what determines when it generates power and, correspondingly, makes deliveries to the utility.

A "true" Canal Drop Hydro project is a project that only delivers energy during the irrigation season (during Idaho Power's peak energy needs), which is when water is in the canal system AND correspondingly produces no generation during the non-peak winter months as there is no water in the canal system. The rationale and concept that a Canal Drop Project receives a higher avoided cost rate both because of its peak deliveries and the lack of non-peak deliveries is confirmed by Commission Staff's direct testimony in this matter. "Canal drops can contribute 100 percent of their capacity during the summer peak and 0 percent of their capacity during the winter peak." McHugh Direct, p. 10. "The rates for canal drop projects are considerably higher for Idaho Power and PacifiCorp compared to other resources primarily because canal drop

projects offer capacity during peak summer hours and their capacity is spread out over relatively few total hours.” McHugh Direct, p. 12. “The capacity component is high for canal drop hydro for two reasons. First, the capacity is provided during peak summer hours when it is most valuable to the utility. Second, the capacity value is spread over fewer kilowatt-hours than for other resource types because a canal drop hydro project would be operating during the irrigation season.” Sterling Direct, p. 21.

Idaho Power’s main concern with the current definition of Canal Drop Hydro is the phrase “produces a majority of its generation during the irrigation season” and, more specifically, the use of the words “majority” and “irrigation season” in that phrase. “Irrigation season” is only relevant because it happens to coincide with Idaho Power’s peak power demands on its system, which are June, July, and August. “Majority” is problematic because what is really contemplated is that it would provide “all” of its generation during peak demands, and, correspondingly, not provide deliveries when the power is not needed in off-peak hours and seasons. For example, “majority” could mean that the project provides 51 percent of its deliveries during the irrigation season, but also that it delivers 49 percent during the rest of the year, when the power is not needed, and the utility’s avoided cost is much less, or even negative. In contrast to a “true” Canal Drop Hydro that only provides generation during the peak summer season, the project with a simple “majority” of 51 percent will have a significantly different capacity factor and avoided cost. While recognizing that some projects may fall somewhere in between where they do actually provide most of their generation during the irrigation season, but still have some amount of year round off-peak generation, Idaho Power proposes that only those Canal Drop Hydro projects whose off-season, off-peak generation is *de minimis* when compared to their in-season, on-peak generation

be qualified to receive the higher capacity factor, Canal Drop Hydro published avoided rate.

Idaho Power proposes that the definition of Canal Drop Hydro be modified to specifically quantify the requirement that it deliver during peak load months, and not during non-peak months, rather than simply stating "majority." Idaho Power requests that the Commission adopt revisions to the definition of a Canal Drop Hydro project to replace "the majority" with "55%" and replace "irrigation season" with "months of June, July, and August." Consequently, the definition of Canal Drop Hydro would be:

A "canal drop hydro project" is defined as a generation facility which produces **55% ~~the majority~~** of its generation during the **months of June, July, and August irrigation season** and is located on a man-made waterway that conveys water primarily intended for irrigation or that primarily conveys irrigation return flows.

Alternatively, should the Commission wish to retain the entire irrigation season in the definition, instead of moving to the peak months of June, July, and August, Idaho Power requests that the definition be modified to replace "the majority" with "96%" and define "irrigation season" as the months of "April through October." This request and these percentages are based upon actual data from all of Idaho Power's QF Canal Drop Hydro projects and their actual delivered generation over the course of the last 10 years.

Over the last 10 years, from 2003 through 2012, Idaho Power has had between 24 and 28 Canal Drop Hydro QF generators under contract and making power deliveries to its system. (Because of on-line dates, terminations, and renewals, the number varied between 24 and 28 over the last 10 years). Over the course of that 10 year period, 96 percent of the monthly energy deliveries from the Canal Drop Hydro

projects on Idaho Power's system occurred during the months of April through October, the entire irrigation season. Over that same period of time, 55 percent of the monthly energy deliveries from Canal Drop Hydro projects occurred during the months of June, July, and August, the Company's summer peak load season. See Attachment 1 hereto, incorporated herein by this reference.¹ Because the intent of offering the higher avoided cost published rate for Canal Drop Hydro projects is to account for the higher value of the peak month deliveries, and the lack of off peak deliveries, Idaho Power proposes to modify the current definition of Canal Drop Hydro by replacing "a majority" with "55%" and replacing "irrigation season" with "months of June, July, and August."

Idaho Power proposes that provisions for the implementation and compliance with the definition and qualification for the higher Canal Drop Hydro rate be contained in the Energy Sales Agreement between the utility and the QF. Initial qualification of the QF as a Canal Drop Hydro project would be referenced in the "Warranties" of the contract, where the definition would be set forth, and the QF would certify that it meets said definition and also provides estimated generation to verify its qualification. With regard to ongoing monitoring of compliance, the actual energy deliveries for June, July, and August (or the larger season, if implemented) would be monitored at year-end to verify that the project meets the definition to receive the higher Canal Drop Hydro rate. If the project failed to deliver its energy in the proper time period, its rate would be reduced to the "hydro" published avoided cost, which is what that project would receive if it does not meet the definition of a Canal Drop Hydro. Because the project would

¹ The generation data includes all projects currently categorized as canal projects, which includes data from five projects that provide consistent year-round generation. If those five projects are excluded from the data, the June, July, and August average monthly deliveries goes up to 58 percent, and the April through October goes up to 99 percent.

have already received the higher Canal Drop Hydro payments for the year, the difference would be trued-up in the following year energy payments.

III. CAPACITY FACTORS FOR CANAL DROP HYDRO AND OTHER

Idaho Power recommends that the resource-specific capacity factor used in the SAR avoided cost model for Canal Drop Hydro projects be revised from the current 100 percent to 67.1 percent and the resource-specific capacity factor used for Other projects be revised from the current 100 percent to 92 percent. It is simply not reasonable to include these resources at 100 percent.

Order No. 32697 directs that published rates will be differentiated based upon resource type stating, "We find that implementation of a separate resource-specific capacity factor is an appropriate way to value when a QF is able to generate and deliver energy to a utility." Order No. 32697 at p. 15. Commission Staff utilized resource-specific capacity factors derived from a combination of capacity factors provided in the Northwest Power and Conservation Council's 6th Power Plan and on-peak capacity factors provided in testimony to this case. The capacity factors used by Commission Staff are:

Wind	5%
Solar	35%
Hydro	25%
Canal Drop Hydro	100%
Other	100%

Idaho Power provided the following resource-specific capacity factors in testimony:

Wind	3.9%
Solar	33.2%
Canal Drop Hydro	67.1%
Base load	92%

Stokes Direct, Ex. No. 3, p. 18. Idaho Power's capacity factors, above, for wind, solar, and Canal Drop Hydro were calculated based upon actual data from existing and proposed projects. *Id.* at pp. 24, 30, and 42. The base load capacity factor was calculated assuming a resource that could control operations and fuel supply to enable the project to plan to operate at 100 percent during peak hours. An 8 percent forced outage rate for a base load resource as identified in the Northwest Power and Conservation Council's 6th Power Plan was deducted from the 100 percent capacity factor to establish an expected capacity factor of 92 percent for a base load project. *Id.* at p. 18.

The record indicates that based upon data from projects on Idaho Power's system, the capacity factor for Canal Drop Hydro is 67.1 percent, as opposed to the 100 percent capacity factor utilized in the present calculation. Idaho Power has provided to the parties, in the Company's response to Commission Staff's Production Request No. 23, the data, spreadsheets, and calculation of the 67.1 percent capacity factor for Canal Drop Hydro. In addition, over the last 10 years, the 28 Canal Drop Hydro projects that have delivered energy to Idaho Power have a capacity factor of 68 percent over the months of June, July, and August (aggregate actual generation/nameplate for all projects). This confirms the more detailed hourly peak hour capacity factor calculated for the hours of 3:00 p.m. to 7:00 p.m. during the month of July—which is the 67.1 percent capacity referenced above, and detailed in the Company's response to Commission Staff's Production Request No. 23.

Idaho Power equates the Other category established by the Commission to be the resources that Idaho Power has identified as "base load." These projects are generation resources that tend to deliver the same level of energy on an hourly basis in

all hours, all days, and for the full-term of the contract. For example, wood waste, anaerobic digesters, landfill gas, waste to energy, and geothermal projects. Idaho Power does not disagree that these resource types tend to be continuous, flat running, base load generation resources. However, it is not reasonable to assume that a project will achieve a perfect 100 percent capacity factor and will never have any outages during Idaho Power's peak energy need period during the 20-year contract term as is implied by the suggested use of a 100 percent capacity factor. Even a well operated and maintained facility is likely to have unexpected mechanical and forced outages occur over the typical 20-year contractual term, and it is not reasonable to pay a 20-year price based upon the assumption that a project has a perfect 100 percent capacity factor.

The actual operational data for Canal Drop Hydro projects currently operating on Idaho Power's system suggests a 67 percent capacity factor. Idaho Power asks that the Commission direct the use of a 67.1 percent capacity factor for Canal Drop Hydro projects in the SAR published avoided cost rate model rather than the 100 percent presently being used. Additionally, the Northwest Power and Conservation Council's 8 percent forced outage rate is a fair, reasonable, and independent source to provide the appropriate adjustment. Idaho Power asks that the Commission direct the use of a 92 percent capacity factor for Other, or base load, projects in the SAR published avoided cost rate model rather than the 100 percent presently being used.

IV. CONCLUSION

For the reasons set forth above, Idaho Power requests that the Commission adopt the proposed revisions to the definition of a Canal Drop Hydro project to replace "a majority" with "55%" and replace "irrigation season" with "months of June, July, and

August.” Alternatively, should the Commission wish to retain the entire irrigation season in the definition, instead of moving to the peak months of June, July, and August, Idaho Power requests that the definition be modified to replace “a majority” with “96%” and define “irrigation season” as the months of “April through October.” Further, with regard to the resource-specific capacity factors, Idaho Power asks that the Commission direct the use of a resource-specific capacity factor of 67.1 percent for Canal Drop Hydro projects and a capacity factor of 92 percent for Other projects rather than the 100 percent currently used.

Respectfully submitted this 25th day March 2013.

A handwritten signature in black ink, appearing to read "Don E. Walker", written over a horizontal line.

DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of March 2013 I served a true and correct copy of IDAHO POWER COMPANY'S COMMENTS ON RECONSIDERATION upon the following named parties by the method indicated below, and addressed to the following:

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Christa Beary, Legal Assistant

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. GNR-E-11-03

IDAHO POWER COMPANY

ATTACHMENT 1

Idaho Power Company Canal Projects												Year
Total Monthly Generation (MWh)												
January	February	March	April	May	June	July	August	September	October	November	December	
1,260	1,061	846	8,647	29,870	36,056	45,428	35,284	24,128	10,962	1,931	1,700	2003
1,360	1,476	1,057	17,128	33,382	36,843	36,835	28,625	23,953	9,361	2,027	1,691	2004
1,363	997	906	6,363	25,606	41,203	47,583	43,289	32,456	13,924	1,909	1,911	2005
1,902	3,994	4,402	18,276	43,293	49,614	50,819	45,911	34,389	13,980	2,004	1,701	2006
1,307	825	1,629	19,166	42,424	44,654	44,209	36,994	27,814	11,490	2,080	1,782	2007
1,334	1,193	918	9,988	41,876	45,155	48,473	42,133	32,360	15,126	1,976	1,804	2008
1,266	978	825	13,843	42,908	44,338	49,369	43,212	36,505	13,716	1,858	1,855	2009
1,282	1,025	932	12,261	38,851	42,840	47,165	47,566	36,425	20,247	1,723	1,567	2010
1,562	956	1,552	15,824	44,526	50,965	56,603	51,409	44,922	25,938	4,496	1,571	2011
1,340	1,355	5,419	29,542	49,116	47,604	51,051	44,501	34,300	16,054	4,516	1,586	2012
13,976	13,860	18,485	151,039	391,851	439,272	477,536	418,925	327,253	150,798	24,519	17,168	TOTAL
10 Year June-August Percent Generation												
55%												
10 Year April-October Percent Generation												
96%												