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IDAHO PUBLIC UTILITIES COMMISSION

DONOVAN E. WALKER
Lead Counsel
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October 15, 2013

VIA HAND DELIVERY

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

Re: Case No.

IPC-E-13-18

PURPA SAR and IRP Methodologies – Idaho Power Company's Annual Compliance Filing to Update the Load and Gas Forecasts in the Incremental Cost Integrated Resource Plan Avoided Cost Model

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Annual Compliance Filing to Update the Load and Gas Forecasts in the Incremental Cost Integrated Resource Plan Avoided Cost Model.

Very truly yours,

Donovan E. Walker

DEW:csb
Enclosures

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UTILITIES COMMISSION

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) ANNUAL COMPLIANCE FILING TO
PLANNING (IRP) METHODOLOGIES FOR) UPDATE THE LOAD AND GAS
CALCULATING AVOIDED COST RATES.) FORECASTS IN THE INCREMENTAL
) COST INTEGRATED RESOURCE
) PLAN AVOIDED COST MODEL
)

Idaho Power Company ("Idaho Power") hereby respectfully submits to the Idaho Public Utilities Commission ("Commission") this filing in compliance with Order Nos. 32697 and 32802 to update the load forecast and natural gas forecast components of the incremental cost Integrated Resource Plan ("IRP") avoided cost methodology.

I. INTRODUCTION

In its final Order No. 32697, the Commission determined that the inputs to the incremental cost IRP avoided cost methodology, utilized for all proposed Public Utility Regulatory Policies Act of 1978 ("PURPA") qualifying facility ("QF") projects that exceed the published rate eligibility cap, will be updated every two years upon

acknowledgement of the utility's IRP filing, with the exception of the load forecast and the natural gas forecast—which is to be updated annually by October 15 of each year.

The Commission stated:

We find that, in order to maintain the most accurate and up-to-date reflection of a utility's true avoided cost, utilities must update fuel price forecasts and load forecasts annually – between IRP filings. For the sake of consistency, these annual updates should occur simultaneously with SAR updates – on June 1 of each year. In addition, it is appropriate to consider long-term contract commitments because of the potential effect that such commitments have on a utility's load and resource balance. We find it reasonable to include long-term contract considerations in an IRP Methodology calculation at such time as the QF and utility have entered into a signed contract for the sale and purchase of QF power. We further find it appropriate to consider PURPA contracts that have terminated or expired in each utility's load and resource balance. We find it reasonable that all other variables and assumptions utilized within the IRP Methodology remain fixed between IRP filings (every two years).

Order No. 32697, p. 22. The date for the annual update was later changed from June 1 to October 15 of each year. Order No. 32802.

The load forecast, natural gas forecast, and contract information presented below in compliance with the Commission's Orders has been incorporated into Idaho Power's incremental cost IRP avoided cost methodology. Consistent with the Commission's prior Orders, this methodology will be utilized by Idaho Power as the starting point for the negotiation of its contractual avoided cost rates as of October 15, 2013.

II. LOAD FORECAST

Idaho Power's most recent load forecast is dated October 7, 2013, and is the same load forecast that will be used to prepare the IRP update (each IRP is required to be updated in the off year, between IRP filings, by the Public Utility Commission of

Oregon). The methodology used for the October 7, 2013, load forecast is the same as that used for Idaho Power's IRPs. The current load forecast shows, on average, a slight increase in Idaho Power customer loads when compared to the April 2012 load forecast that was used in the incremental cost IRP avoided cost model presented to the Commission in Case No. GNR-E-11-03.

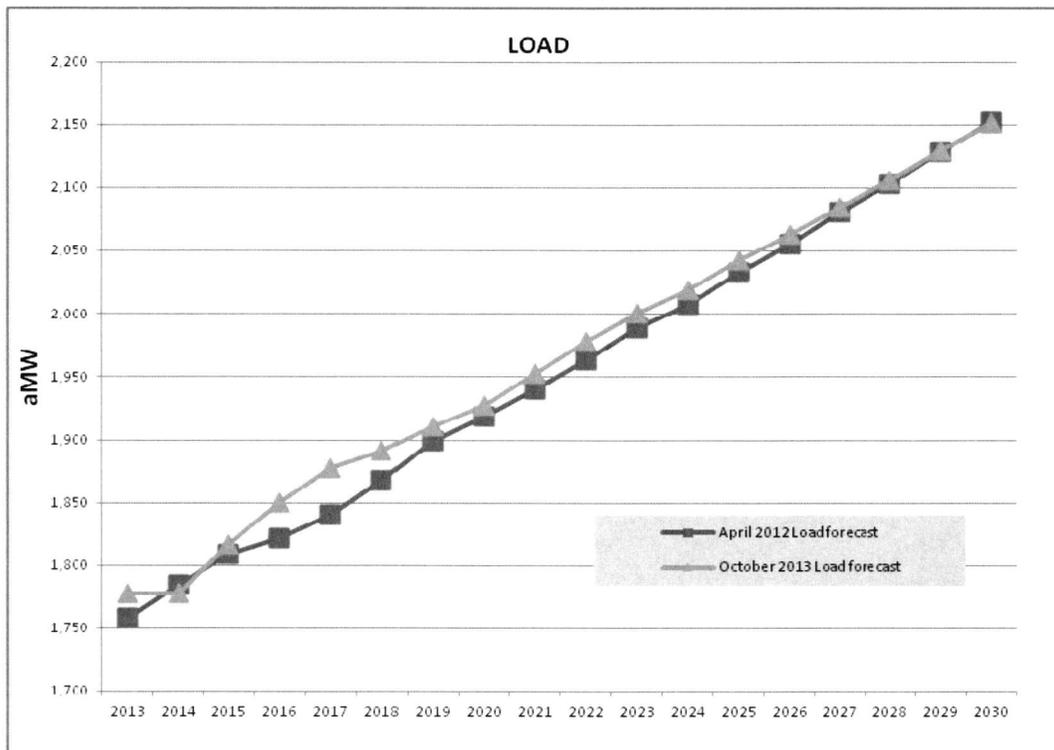
Table 1 and Graph 1 below show the average annual load forecast through 2030 for both the previously utilized April 2012 load forecast and the current October 2013 load forecast.

TABLE 1

Average Annual Load Forecast (MWh)

<u>Year</u>	<u>April 2012 Load Forecast</u>	<u>October 2013 Load Forecast</u>
2013	1,759	1,778
2014	1,785	1,778
2015	1,810	1,817
2016	1,821	1,850
2017	1,840	1,878
2018	1,868	1,892
2019	1,899	1,911
2020	1,919	1,928
2021	1,940	1,953
2022	1,964	1,978
2023	1,989	2,001
2024	2,008	2,020
2025	2,033	2,043
2026	2,055	2,063
2027	2,081	2,085
2028	2,104	2,106
2029	2,129	2,130
2030	2,153	2,151

GRAPH 1



III. NATURAL GAS FORECAST

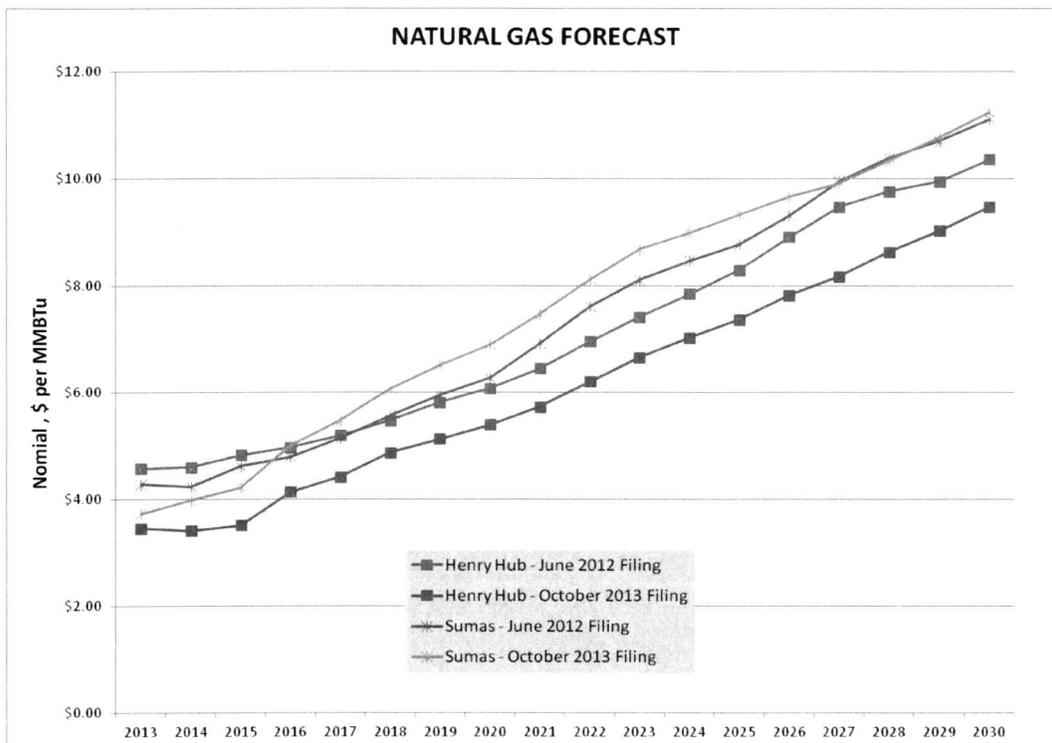
As of October 15, 2013, Idaho Power has updated the natural gas forecast within the incremental cost IRP avoided cost model to reflect the most recent U.S. Energy Information Administration (“EIA”) natural gas forecast. The natural gas forecast is consistent with that utilized for Idaho Power’s IRP and is a combination of the EIA Henry Hub and Sumas natural gas forecasts. The current natural gas forecast indicates, on average, a slight increase in the average annual natural gas forecast prices over the next 20 years in comparison to the EIA 2012 natural gas forecast that was used in the incremental cost IRP avoided cost model presented to the Commission in Case No. GNR-E-11-03.

Table 2 and Graph 2 below show the comparison between the June 2012 and the October 2013 natural gas forecast.

TABLE 2

<u>Year</u>	<u>Henry Hub EIA Natural Gas Forecast</u>		<u>Sumas Natural Gas Forecast</u>	
	<u>June 2012</u>	<u>October 2013</u>	<u>June 2012</u>	<u>October 2013</u>
2013	\$4.57	\$3.45	\$4.27	\$3.73
2014	\$4.59	\$3.41	\$4.23	\$3.97
2015	\$4.82	\$3.51	\$4.61	\$4.22
2016	\$4.97	\$4.13	\$4.79	\$5.01
2017	\$5.19	\$4.41	\$5.14	\$5.47
2018	\$5.47	\$4.87	\$5.56	\$6.06
2019	\$5.81	\$5.13	\$5.94	\$6.52
2020	\$6.07	\$5.39	\$6.28	\$6.90
2021	\$6.45	\$5.72	\$6.92	\$7.47
2022	\$6.96	\$6.20	\$7.61	\$8.11
2023	\$7.42	\$6.66	\$8.11	\$8.68
2024	\$7.85	\$7.03	\$8.47	\$8.99
2025	\$8.29	\$7.37	\$8.77	\$9.32
2026	\$8.91	\$7.82	\$9.31	\$9.65
2027	\$9.47	\$8.17	\$9.95	\$9.92
2028	\$9.75	\$8.63	\$10.38	\$10.32
2029	\$9.94	\$9.02	\$10.70	\$10.77
2030	\$10.35	\$9.46	\$11.11	\$11.23

GRAPH 2



IV. CONTRACT TERMINATIONS, EXPIRATIONS, AND ADDITIONS

Idaho Power currently has 103 QF projects under contract with a nameplate capacity of 778 megawatts ("MW"). Idaho Power also currently has three non-PURPA, long-term power purchase agreements: Elkhorn Valley Wind (101 MW), Raft River Geothermal (18 MW), and Neal Hot Springs Geothermal (30 MW).

Order No. 32697 directs that new contracts be incorporated into the incremental cost IRP avoided cost methodology at the time the QF and utility have entered into a signed contract, and that terminated or expired contracts should likewise be included in the utility's load and resource balance. As such, Idaho Power has included new contracts at the time that they are signed by both parties, and has removed terminated/expired agreements from inclusion in the avoided cost methodology. Because this is the first annual compliance filing to be made following the conclusion of Case No. GNR-E-11-03, and at Commission Staff's request, Idaho Power is including as Table 3 an updated list of all current QF projects currently under contract with Idaho Power. Table 3 identifies changes in the entire portfolio of QF contracts that have occurred since this same information was filed with the Commission as of December 31, 2011, as Exhibit No. 1 to the Direct Testimony of M. Mark Stokes in Case No. GNR-E-11-03.

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TABLE 3

**Idaho Power Company
Cogeneration and Small Power Production
Projects under contract as of October 15, 2013**

	Resource Type	Project Name	State	County	MW	Status
1	Biomass	Tamarack Cspp	ID	Adams	5.00	On-line
2	Cogen	Magic Valley	ID	Minidoka	10.00	On-line
3	Cogen	Tasco - Nampa	ID	Canyon	2.00	On-line
4	Cogen	Tasco - Twin Falls	ID	Twin Falls	3.00	On-line
5	Digester	B6 Anaerobic Digester	ID	Gooding	2.28	On-line
6	Digester	Bettencourt Dry Creek, LLC	ID	Twin Falls	2.25	On-line
7	Digester	Big Sky West Dairy Digester	ID	Gooding	1.50	On-line
8	Digester	Double A Digester	ID	Lincoln	4.50	On-line
9	Digester	Pocatello Waste	ID	Bannock	0.46	On-line
10	Digester	Rock Creek Dairy	ID	Twin Falls	4.00	On-line
11	Hydro	Arena Drop	ID	Canyon	0.45	On-line
12	Hydro	Barber Dam	ID	Ada	3.70	On-line
13	Hydro	Birch Creek	ID	Gooding	0.05	On-line
14	Hydro	Black Canyon #3	ID	Gooding	0.14	On-line
15	Hydro	Blind Canyon	ID	Gooding	1.50	On-line
16	Hydro	Box Canyon	ID	Twin Falls	0.36	On-line
17	Hydro	Briggs Creek	ID	Twin Falls	0.60	On-line
18	Hydro	Bypass	ID	Jerome	9.96	On-line
19	Hydro	Canyon Springs	ID	Twin Falls	0.13	On-line
20	Hydro	Cedar Draw	ID	Twin Falls	1.55	On-line
21	Hydro	Clear Springs Trout	ID	Twin Falls	0.52	On-line
22	Hydro	Crystal Springs	ID	Twin Falls	2.44	On-line
23	Hydro	Curry Cattle Company	ID	Twin Falls	0.22	On-line
24	Hydro	Dietrich Drop	ID	Jerome	4.50	On-line
25	Hydro	Elk Creek	ID	Idaho	2.00	On-line
26	Hydro	Falls River	ID	Fremont	9.10	On-line
27	Hydro	Fargo Drop Hydro	ID	Canyon	1.27	On-line
28	Hydro	Faulkner Ranch	ID	Gooding	0.87	On-line
29	Hydro	Fisheries Dev.	ID	Gooding	0.26	On-line
30	Hydro	Geo-Bon #2	ID	Lincoln	0.93	On-line
31	Hydro	Hailey Cspp	ID	Blaine	0.06	On-line
32	Hydro	Hazelton A	ID	Jerome	8.10	On-line
33	Hydro	Hazelton B	ID	Jerome	7.60	On-line
34	Hydro	Horseshoe Bend Hydro	ID	Boise	9.50	On-line
35	Hydro	Jim Knight	ID	Gooding	0.34	On-line
36	Hydro	Kasel & Witherspoon	ID	Twin Falls	0.90	On-line
37	Hydro	Koyle Small Hydro	ID	Gooding	1.25	On-line
38	Hydro	Lateral # 10	ID	Twin Falls	2.06	On-line
39	Hydro	Lemoyne	ID	Gooding	0.08	On-line

40	Hydro	Little Wood Rvr Res	ID	Blaine	2.85	On-line
41	Hydro	Littlewood / Arkoosh	ID	Lincoln	0.87	On-line
42	Hydro	Low Line Canal	ID	Twin Falls	7.97	On-line
43	Hydro	Low Line Midway Hydro	ID	Twin Falls	2.50	On-line
44	Hydro	Lowline #2	ID	Twin Falls	2.79	On-line
45	Hydro	Magic Reservoir	ID	Blaine	9.07	On-line
46	Hydro	Malad River	ID	Gooding	0.62	On-line
47	Hydro	Marco Ranches	ID	Jerome	1.20	On-line
48	Hydro	Mile 28	ID	Jerome	1.50	On-line
49	Hydro	Mill Creek (City of Cove)	OR	Union	0.80	On-line
50	Hydro	Mitchell Butte	OR	Malheur	2.09	On-line
51	Hydro	Mora Drop	ID	Ada	1.85	On-line
52	Hydro	Mud Creek/S & S	ID	Twin Falls	0.52	On-line
53	Hydro	Mud Creek/White	ID	Twin Falls	0.21	On-line
54	Hydro	Owyhee Dam Cspg	OR	Malheur	5.00	On-line
55	Hydro	Pigeon Cove	ID	Twin Falls	1.89	On-line
56	Hydro	Pristine Springs #1	ID	Jerome	0.13	On-line
57	Hydro	Pristine Springs Hydro #3	ID	Jerome	0.20	On-line
58	Hydro	Reynolds Irrigation	ID	Canyon	0.26	On-line
59	Hydro	Rock Creek #1	ID	Twin Falls	2.05	On-line
60	Hydro	Rock Creek #2	ID	Twin Falls	1.90	On-line
61	Hydro	Sagebrush	ID	Lincoln	0.43	On-line
62	Hydro	Sahko Hydro	ID	Twin Falls	0.50	On-line
63	Hydro	Schaffner	ID	Lemhi	0.53	On-line
64	Hydro	Shingle Creek	ID	Adams	0.22	On-line
65	Hydro	Shoshone #2	ID	Lincoln	0.58	On-line
66	Hydro	Shoshone Cspg	ID	Lincoln	0.37	On-line
67	Hydro	Snake River Pottery	ID	Gooding	0.07	On-line
68	Hydro	Snedigar	ID	Twin Falls	0.54	On-line
69	Hydro	Tiber Dam	MT	Liberty	7.50	On-line
70	Hydro	Trout-Co	ID	Gooding	0.24	On-line
71	Hydro	Tunnel #1	OR	Malheur	7.00	On-line
72	Hydro	White Water Ranch	ID	Gooding	0.16	On-line
73	Hydro	Wilson Lake Hydro	ID	Jerome	8.40	On-line
74	Industrial	Simplot Pocatello	ID	Power	15.90	On-line
75	Landfill gas	Hidden Hollow Landfill Gas	ID	Ada	3.20	On-line
76	Wind	Bennett Creek Wind Farm	ID	Elmore	21.00	On-line
77	Wind	Burley Butte Wind	ID	Cassia	21.30	On-line
78	Wind	Camp Reed Wind Park, LLC	ID	Elmore	22.50	On-line
79	Wind	Cassia Wind Farm LLC	ID	Twin Falls	10.50	On-line
80	Wind	Cold Springs Windfarm	ID	Elmore	23.00	On-line
81	Wind	Desert Meadow Windfarm	ID	Elmore	23.00	On-line
82	Wind	Fossil Gulch Wind	ID	Twin Falls	10.50	On-line
83	Wind	Golden Valley Wind	ID	Cassia	12.00	On-line
84	Wind	Hammett Hill Windfarm	ID	Elmore	23.00	On-line
85	Wind	High Mesa	ID	Elmore	40.00	On-line
86	Wind	Horseshoe Bend Wind	MT	Cascade	9.00	On-line
87	Wind	Hot Springs Wind Farm	ID	Elmore	21.00	On-line
88	Wind	Lime Wind Energy	OR	Baker	3.00	On-line

89	Wind	Mainline Windfarm	ID	Elmore	23.00	On-line
90	Wind	Milner Dam Wind	ID	Cassia	19.92	On-line
91	Wind	Oregon Trail Wind	ID	Twin Falls	13.50	On-line
92	Wind	Payne's Ferry Wind Park, LLC	ID	Twin Falls	21.00	On-line
93	Wind	Pilgrim Stage Station Wind	ID	Twin Falls	10.50	On-line
94	Wind	Rockland Wind Project	ID	Power	80.00	On-line
95	Wind	Ryegrass Windfarm	ID	Elmore	23.00	On-line
96	Wind	Salmon Falls Wind	ID	Twin Falls	22.00	On-line
97	Wind	Sawtooth Wind Project	ID	Elmore	22.00	On-line
98	Wind	Thousand Springs Wind	ID	Twin Falls	12.00	On-line
99	Wind	Tuana Gulch Wind	ID	Twin Falls	10.50	On-line
100	Wind	Tuana Springs Expansion	ID	Twin Falls	35.70	On-line
101	Wind	Two Ponds Windfarm	ID	Elmore	23.00	On-line
102	Wind	Yahoo Creek Wind Park, LLC	ID	Twin Falls	21.00	On-line
103	Hydro	Clark Canyon Dam	MT	Beaverhead	4.70	Not On-line
Subtotal					778.93	

New Contracts

1	Wind	Benson Creek Wind	OR	Baker	10.00	Not On-line
2	Wind	Durbin Creek Wind	OR	Baker	10.00	Not On-line
3	Wind	Jett Creek Wind	OR	Baker	10.00	Not On-line
4	Wind	Prospector Wind	OR	Baker	10.00	Not On-line
					<u>40.00</u>	

Expired

1	Biomass	Cogen Co	OR	Grant	10.00	
2	Hydro	Rim View	ID	Gooding	0.20	
					<u>10.20</u>	

Terminated

1	Biomass	Yellowstone Power	ID	Gem	10.00	
2	Biomass	Dynamis	ID	Ada	22.00	
3	Solar	Grand View Solar I	ID	Elmore	20.00	
4	Solar	Murphy Solar	ID	Owhyee	20.00	
5	Wind	Cottonwood Wind Park	ID	Twin Falls	20.00	
6	Wind	Deep Creek Wind Park	ID	Twin Falls	20.00	
7	Wind	Lava Beds Wind	ID	Bingham	18.00	
8	Wind	Notch Butte Wind	ID	Jerome	18.00	
9	Wind	Rogerson Flats Wind Park	ID	Twin Falls	20.00	
10	Wind	Salmon Creek Wind Farm	ID	Twin Falls	20.00	
11	Cogen	Magic West	ID	Elmore	10.00	
					<u>198.00</u>	

Contracts Terminated and in Litigation

1	Landfill	Hidden Hollow Energy II Landfill Gas Project	ID	Ada	3.20
2	Digester	Double B Dairy	ID	Cassia	2.00
3	Digester	Swager Farms	ID	Twin Falls	2.00
					<u>7.20</u>

No Contract, in Litigation

1	Solar	Grand View Solar II	ID	Elmore	20.00
2	Solar	Grand View Solar III	ID	Elmore	20.00
3	Solar	Grand View Solar IV	ID	Elmore	20.00
4	Landfill	Kootenai County	ID	Kootenai	3.20
					<u>63.20</u>

Not Approved by the Commission and in Litigation

1	Wind	Grouse Creek I	UT	Lynn	21.00
2	Wind	Grouse Creek II	UT	Lynn	21.00
3	Wind	Murphy Flat Energy	ID	Owyhee	20.00
4	Wind	Murphy Flat Mesa	ID	Owyhee	20.00
5	Wind	Murphy Flat Wind	ID	Owyhee	20.00
6	Wind	Rainbow Ranch Wind	ID	Cassia	20.00
7	Wind	Rainbow West Wind	ID	Cassia	20.00
					<u>142.00</u>

V. CONCLUSION

Idaho Power hereby respectfully submits this updated load forecast, natural gas forecast, and contract information in compliance with the Commission's directives in Order Nos. 32697 and 32802 and asks the Commission to accept the same for filing.

Respectfully submitted this 15th day October 2013.



DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of October 2013 I served a true and correct copy of IDAHO POWER COMPANY'S ANNUAL COMPLIANCE FILING TO UPDATE THE LOAD AND GAS FORECASTS IN THE INCREMENTAL COST INTEGRATED RESOURCE PLAN AVOIDED COST MODEL upon the following named parties by the method indicated below, and addressed to the following:

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Twin Falls Canal Company, North Side Canal Company, Big Wood Canal Company, and American Falls Reservoir District No. 2

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