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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR APPROVAL OF ITS CAPACITY DEFICIENCY PERIOD TO BE UTILIZED IN THE COMPANY'S SAR METHODOLOGY.	**CASE NO. IPC-E-13-21** **COMMENTS OF THE COMMISSION STAFF**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Modified Procedure and Notice of Scheduling issued in Order No. 32969 on January 24, 2014, in Case No. IPC-E-13-21, submits the following comments.

BACKGROUND

In Order No. 32697, the Commission directed that a case be initiated outside of each utility's Integrated Resource Plan (IRP) filing to establish a capacity deficiency period to be utilized in the utility's Surrogate Avoided Resource (SAR) methodology for computing avoided cost rates to be included in PURPA power purchase agreements. On November 4, 2013, Idaho Power filed an Application requesting that the Commission approve its updated capacity deficiency periods to be utilized in the SAR avoided cost methodology.

STAFF ANALYSIS

Idaho Power filed its 2013 IRP with the Commission on June 28, 2013. The Commission accepted and acknowledged the Company's 2013 IRP on February 24, 2014. (*See* Order No. 32980). In its 2013 IRP, Idaho Power identifies that the first peak-hour deficit occurrs in July 2016. As described in the 2013 IRP, peak-hour load deficits are determined using the 90th percentile water and 95th percentile peak-hour load conditions.

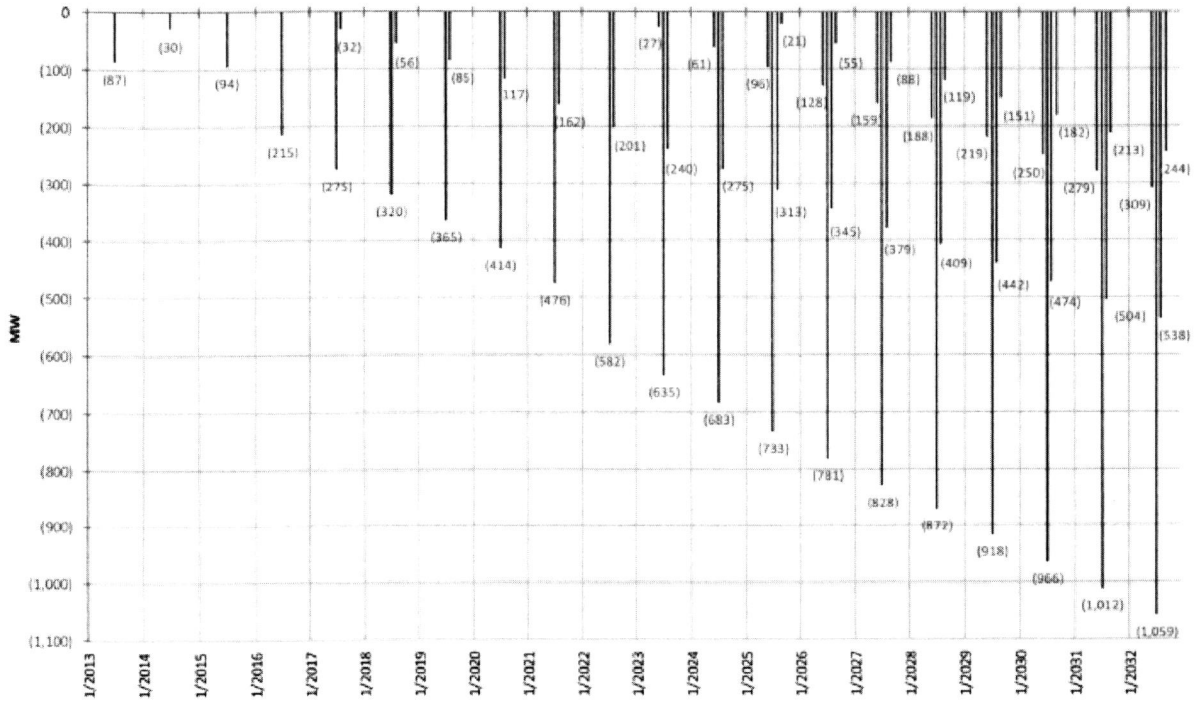
On October 15, 2013, pursuant to the Commission's directives in Order No. 32697 and Order No. 32802, Idaho Power filed updated components of the incremental cost IRP avoided cost methodology consisting of an updated load forecast, updated natural gas forecast, and updated list of new and terminated PURPA contracts and long-term power purchase agreements. Updating the 2013 IRP peak-hour deficits with the updated load and contract information from Case No. IPC-E-13-18[1] results in the deficits shown in the figure below, reproduced from Idaho Power's Application. As shown in the figure, the first deficit occurs in July 2013.

[1] The Commission accepted the updated information for purposes of setting avoided costs in Order No. 32941.

Peak-Hour Surplus/Deficit Charts

(90th Percentile Water and 95th Percentile Load)

Peak-Hour Monthly Deficits with Existing and Committed Resources and Existing Energy Efficiency (2013 IRP with October 2013 Load and September 2013 CSPP Forecasts)



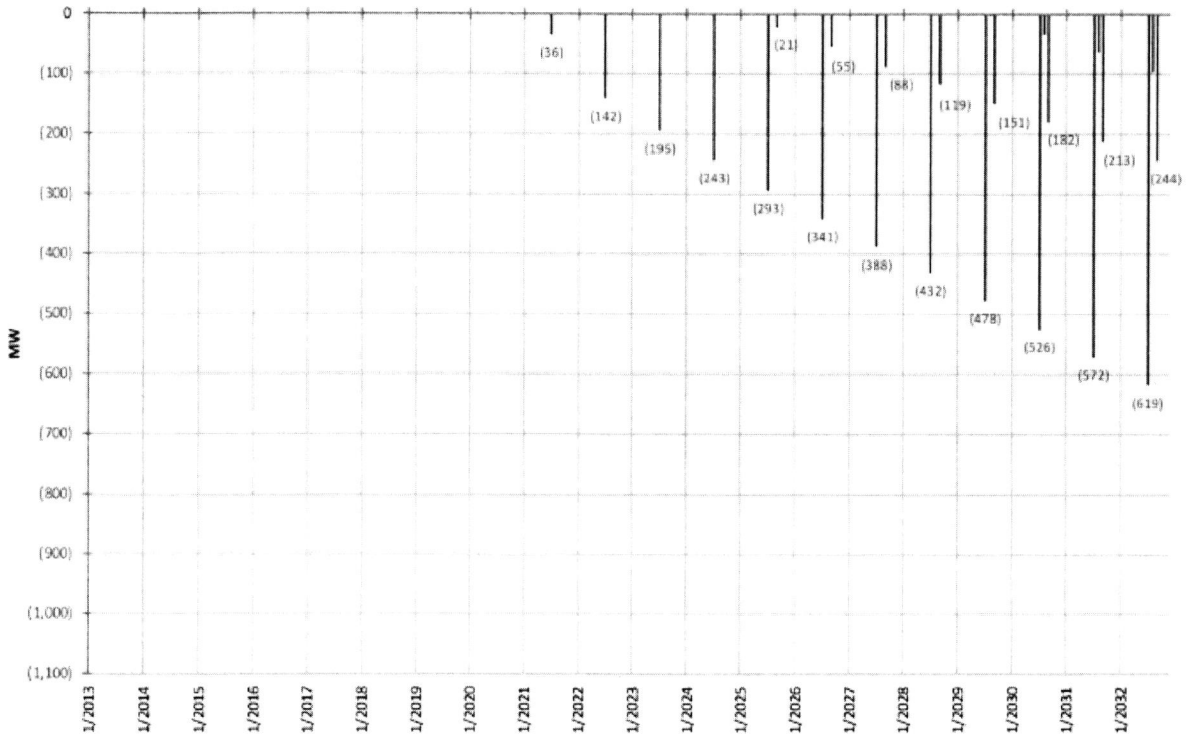
Impact of Demand Response Programs on Idaho Power's First Deficit Year

On October 2, 2013, Idaho Power filed a settlement agreement regarding the continuation of its demand response programs. Case No. IPC-E-13-14. The settlement agreement was approved by the Commission on November 12, 2013. *See* Order No. 32923. Idaho Power's IRP states that "demand response programs will be used throughout the planning period to meet resource needs." 2013 IRP, p. 8. Updating the figure above with 440 MW of Idaho Power demand response programs results in the peak-hour deficits shown in the figure below, reproduced from the Company's Application. Based on this information, the first capacity deficit occurs in July of 2021.

Peak-Hour Surplus/Deficit Charts

(90th Percentile Water and 95th Percentile Load)

Peak-Hour Monthly Deficits with Existing and Committed Resources and Existing Energy Efficiency (2013 IRP with October 2013 Load and September 2013 CSPP Forecasts and Demand Response up to 440 MW)



Inclusion of Demand Response in Idaho Power's Load-Resource Balance

Idaho Power's inclusion of demand response in its load resource balance assumes it can reliably and immediately provide 440 MW continually throughout the entire 20-year planning period. Staff believes this contradicts the basis of the Commission- approved settlement agreement, the likely effect of the program modifications included in the settlement, and is not justified by the Company's responses to discovery in this case. Staff maintains that the most reasonable estimate of the capacity provided by Idaho Power's demand response portfolio is 170 MW.

Basis of the Settlement

The demand response settlement established the value of Idaho Power's demand response portfolio based on the size of the supply-side resource that it would defer. Before the October and September 2013 updates, Idaho Power's 2013 IRP forecasted an 89 MW deficit in 2016, a

139 MW deficit in 2017, and assumed a 2018 on-line date for the Boardman to Hemingway transmission line.[2] Without demand response, the Company would likely build a 170 MW simple cycle combustion turbine (SCCT) to meet those short-term deficits and remain in the Company's resource portfolio through the life of the plant to meet future capacity deficits. Based on those deficits, the value of Idaho Power's demand response was determined to be equal to the value of the deferred capacity of one 170 MW SCCT decremented by the effective load carrying capacity (ELCC), and including the value of ancillary energy savings over a 20-year planning horizon. The terms of the settlement, including the annual monetized value of demand response and subsequent incentive payments, were established on the basis of preserving a 170 MW demand response resource rather than a 440 MW demand response resource.

The Settlement's Effect on Demand Response Participation

Before the 2013 demand response suspension, Idaho Power reported having 437 MW of peak demand reduction potential.[3] The effect of the October 2013 settlement terms on participation in the reinstated programs is not known. However, Staff believes that the combination of reduced incentive payments, three mandatory annual dispatches, and reduced notification times will shrink the "approximately 400 megawatts ("MW") of potential demand response capacity" that existed prior to the agreement.[4]

In particular, irrigators—which since 2011 have provided at least 320 MW of Idaho Power's total demand response potential— repeatedly voiced concern during the workshops that the magnitude of the incentive reduction and dramatic reduction in dispatch notification times would likely lead to decreased participation from their members. Before the suspension and settlement, irrigation participants received a much higher incentive payment and were not interrupted at all in some years, so Staff agrees that the settlement terms will likely induce some program attrition. Staff supported reducing payments to irrigators in the belief that it is more important to lower costs for all ratepayers than pay higher incentives in an attempt to maintain demand response in excess of the supply-side resource it defers. In response to discovery, Idaho Power confirmed that although the settlement requires the Company to offer participation to all existing participants, Idaho Power also expects reduced participation.

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[2] Boardman to Hemingway's expected on-line date has been revised to "2020 or beyond" according to Idaho Power Company's response to Request for Production number five from the J.R. Simplot Company.
[3] Idaho Power 2012 Demand Response Annual Report, page 145.
[4] Demand Response Program Settlement Agreement, page 3. IPC-E-13-14.

Because the reduced incentives are based on deferring a 170 MW SCCT and several parties anticipate program attrition, Staff believes that the demand response portfolio is more likely to align with the 170 MW avoided resource specified in the settlement than the 440 MW listed in Idaho Power's Application.[5]

Idaho Power's Response to Discovery

Because the Company's Application did not provide any evidence to support its claim regarding 440 MW of existing and ongoing demand response, Staff asked several discovery questions in an effort to determine the basis for the Company's estimate. In multiple responses, Idaho Power emphasized that the "Company believes that is a reasonable assumption that it can satisfy the deficit of 30 Megawatts ("MW") in 2014…with its existing demand response programs if necessary."[6]

Staff agrees that Idaho Power's demand response can satisfy a 30 MW deficit in 2014, but does not believe that satisfying a deficit of 30 MW in the first year of a 20-year planning period is sufficient evidence to justify including 440 MW of demand response in each year of the planning period.

However, Staff also believes that 30 MW underestimates the Company's demand response portfolio. Even with increased attrition from the 2013 program lapse, the current participation rates indicate that Idaho Power has approximately 30 MW of demand response remaining in its A/C Cool Credit Program. Because the settlement requires Idaho Power to offer a commercial demand response program, Staff believes it is reasonable to include approximately 30 MW of commercial demand response.[7] Lastly, Idaho Power is currently in its annual process of contracting with previous participants for irrigation demand response. Because this process has been in place for several years with existing participants, Staff believes it is reasonable to assume that irrigation participation will not fall more than two-thirds, or below approximately 110 MW, in the first year of the modified program.

Staff acknowledges that the exact size of Idaho Power's demand response resource is not known. However, the settlement agreement requires Idaho Power to "reevaluate the value

[5] Demand Response Programs Settlement Agreement, page 3. IPC-E-13-14.
[6] Idaho Power Company's response to the first production request from Commission Staff to Idaho Power, page 2.
[7] Idaho Power has not developed a company-administered program or issued a request for proposals (RFP) soliciting bids from third-party aggregators, so Staff anticipates that Idaho Power will renew or extend its contract with Enernoc to provide approximately 30 MW of commercial demand response.

calculation [of demand response] as the IRP changes."[8] This means that Idaho Power will have a year of modified program experience before publishing its next IRP in 2015, which will allow the Company and stakeholders to determine how the reduced incentives, increased interruptions, and shortened notification times affect program capacity and reliability. Until more precise information is available, Staff believes it is appropriate to include 170 MW of demand response for the purpose of calculating the Company's first capacity deficit year in this case.

Updating the peak-hour deficits listed in Table 2 of the Company's Application with 170 MW of demand response results in the first capacity deficit occurring in July 2016.

Energy Deficit Position

Idaho Power did not present or discuss its current annual energy position in its Application. As a result, Staff's review relied on the Company's annual energy positions as presented in its 2013 IRP. In the 2013 IRP, average energy surpluses and deficits are determined using 70th percentile water and 70th percentile average load conditions, coupled with Idaho Power's ability to import energy from firm market purchases using reserved network capacity. On a monthly basis, including the impacts of the Company's demand-side management programs, Idaho Power does not expect to be deficit throughout the entire 20-year planning period. Idaho Power's energy position does not affect computation of avoided cost rates because the Company's capacity position is most critical in all years throughout the 20-year planning period.

Results of Avoided Cost Computations

Based on Staff's inclusion of 170 MW of demand response and Idaho Power's updates to load and purchase contracts, Staff computed the SAR methodology avoided cost rates. The rates are shown on Attachment A for wind, solar, non-seasonal hydro, seasonal hydro, and other project types.

[8] Demand Response Programs Settlement Agreement, page 2.

STAFF RECOMMENDATIONS

Staff recommends approval of a 2016 first deficit year assumption for capacity as discussed above. This deficit year assumption is based on the inclusion of 170 MW of summer demand response throughout the 20-year planning period. Staff further recommends approval of the SAR methodology avoided cost rates as contained in Attachment A to Staff's comments. Finally, Staff recommends that the rates be effective as of the date of Commission approval.

Respectfully submitted this 28TH day of February 2014.

Kristine A. Sasser
Deputy Attorney General

Technical Staff: Rick Sterling
Stacey Donohue

i:umisc:comments/ipce13.21ksrpssd comments

IDAHO POWER COMPANY
AVOIDED COST RATES FOR WIND PROJECTS
March XX, 2014
$/MWh
New Contracts and Replacement Contracts without Full Capacity Payments

Eligibility for these rates is limited to projects 100 kW or smaller.

LEVELIZED							NON-LEVELIZED	
CONTRACT LENGTH (YEARS)	ON-LINE YEAR						CONTRACT YEAR	NON-LEVELIZED RATES
	2014	2015	2016	2017	2018	2019		
1	29.08	30.37	35.27	37.86	41.25	43.64	2014	29.08
2	29.70	32.72	36.52	39.49	42.40	44.56	2015	30.37
3	31.41	34.30	37.97	40.77	43.37	46.76	2016	35.27
4	32.84	35.84	39.23	41.83	45.22	48.64	2017	37.86
5	34.27	37.17	40.30	43.51	46.92	50.27	2018	41.25
6	35.54	38.30	41.85	45.10	48.45	51.53	2019	43.64
7	36.66	39.80	43.35	46.56	49.69	52.58	2020	45.55
8	38.06	41.24	44.73	47.78	50.75	53.50	2021	51.73
9	39.43	42.59	45.91	48.83	51.67	54.28	2022	55.25
10	40.71	43.75	46.94	49.75	52.47	55.02	2023	58.20
11	41.84	44.78	47.86	50.56	53.22	55.74	2024	59.56
12	42.83	45.70	48.67	51.32	53.95	56.44	2025	60.99
13	43.73	46.51	49.43	52.05	54.64	57.13	2026	62.37
14	44.53	47.27	50.15	52.74	55.33	57.84	2027	63.36
15	45.28	47.99	50.83	53.43	56.03	58.55	2028	65.12
16	45.99	48.67	51.51	54.11	56.72	59.30	2029	67.09
17	46.66	49.34	52.18	54.79	57.44	60.09	2030	69.09
18	47.32	50.00	52.84	55.49	58.21	60.92	2031	71.58
19	47.96	50.65	53.52	56.22	59.00	61.78	2032	74.45
20	48.59	51.31	54.22	56.98	59.82	62.67	2033	77.47
							2034	81.47
							2035	86.49
							2036	91.75
							2037	97.20
							2038	103.41
							2039	107.10

Note: These rates will be further adjusted with the applicable integration charge.

Note: The rates shown in this table have been computed using the U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013 released May 2, 2013. See "Annual Energy Outlook 2013, All Tables, Energy Prices by Sector and Source, Mountain, Reference case" at http://www.eia.gov/oiaf/aeo/tablebrowser/.

IDAHO POWER COMPANY
AVOIDED COST RATES FOR SOLAR PROJECTS
March XX, 2014
$/MWh
New Contracts and Replacement Contracts without Full Capacity Payments

Eligibility for these rates is limited to projects 100 kW or smaller.

LEVELIZED							NON-LEVELIZED	
CONTRACT LENGTH (YEARS)	ON-LINE YEAR						CONTRACT YEAR	NON-LEVELIZED RATES
	2014	2015	2016	2017	2018	2019		
1	29.08	30.37	65.41	68.44	72.28	75.12	2014	29.08
2	29.70	47.20	66.87	70.28	73.64	76.26	2015	30.37
3	40.68	53.73	68.53	71.77	74.83	77.71	2016	65.41
4	46.82	57.84	69.99	73.04	76.18	79.30	2017	68.44
5	51.15	60.77	71.26	74.38	77.67	80.83	2018	72.28
6	54.40	63.04	72.58	75.81	79.11	82.09	2019	75.12
7	56.97	65.04	73.95	77.20	80.33	83.19	2020	77.49
8	59.21	66.90	75.29	78.41	81.42	84.18	2021	80.96
9	61.26	68.60	76.47	79.49	82.41	85.06	2022	84.92
10	63.11	70.07	77.53	80.47	83.29	85.91	2023	88.30
11	64.71	71.37	78.50	81.35	84.13	86.75	2024	90.09
12	66.13	72.54	79.37	82.19	84.95	87.56	2025	91.97
13	67.41	73.59	80.21	83.00	85.76	88.38	2026	93.81
14	68.54	74.56	81.01	83.79	86.56	89.21	2027	95.25
15	69.59	75.48	81.79	84.58	87.36	90.05	2028	97.48
16	70.58	76.36	82.55	85.36	88.17	90.92	2029	99.93
17	71.51	77.20	83.32	86.15	89.01	91.83	2030	102.41
18	72.40	78.03	84.08	86.95	89.88	92.78	2031	105.38
19	73.26	78.84	84.85	87.79	90.78	93.76	2032	108.75
20	74.09	79.65	85.65	88.65	91.71	94.77	2033	112.27
							2034	116.78
							2035	122.32
							2036	128.11
							2037	134.09
							2038	140.84
							2039	145.09

Note: These rates will be further adjusted with the applicable integration charge.

Note: The rates shown in this table have been computed using the U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013 released May 2, 2013. See "Annual Energy Outlook 2013, All Tables, Energy Prices by Sector and Source, Mountain, Reference case" at http://www.eia.gov/oiaf/aeo/tablebrowser/.

IDAHO POWER COMPANY
AVOIDED COST RATES FOR NON-SEASONAL HYDRO PROJECTS
March XX, 2014
$/MWh
New Contracts and Replacement Contracts without Full Capacity Payments

Eligibility for these rates is limited to projects smaller than 10 aMW.

LEVELIZED							NON-LEVELIZED	
CONTRACT LENGTH (YEARS)	ON-LINE YEAR 2014	2015	2016	2017	2018	2019	CONTRACT YEAR	NON-LEVELIZED RATES
1	29.08	30.37	62.77	65.76	69.56	72.37	2014	29.08
2	29.70	45.93	64.21	67.59	70.91	73.48	2015	30.37
3	39.87	52.03	65.85	69.06	72.07	74.91	2016	62.77
4	45.60	55.91	67.29	70.30	73.41	76.49	2017	65.76
5	49.67	58.71	68.55	71.63	74.88	78.00	2018	69.56
6	52.75	60.88	69.85	73.04	76.30	79.24	2019	72.37
7	55.19	62.80	71.21	74.42	77.51	80.32	2020	74.69
8	57.34	64.59	72.53	75.61	78.58	81.30	2021	78.12
9	59.30	66.25	73.69	76.67	79.55	82.16	2022	82.04
10	61.08	67.68	74.74	77.63	80.41	82.99	2023	85.38
11	62.63	68.94	75.69	78.50	81.24	83.81	2024	87.13
12	64.01	70.08	76.55	79.32	82.05	84.61	2025	88.96
13	65.24	71.09	77.37	80.12	82.83	85.42	2026	90.76
14	66.33	72.04	78.16	80.90	83.62	86.23	2027	92.16
15	67.35	72.94	78.92	81.67	84.41	87.05	2028	94.34
16	68.31	73.79	79.67	82.44	85.21	87.91	2029	96.74
17	69.21	74.62	80.42	83.21	86.03	88.81	2030	99.18
18	70.07	75.43	81.17	84.00	86.89	89.75	2031	102.10
19	70.91	76.22	81.93	84.83	87.78	90.71	2032	105.42
20	71.72	77.01	82.72	85.68	88.70	91.71	2033	108.89
							2034	113.35
							2035	118.84
							2036	124.58
							2037	130.51
							2038	137.21
							2039	141.40

Note: The rates shown in this table have been computed using the U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013 released May 2, 2013. See "Annual Energy Outlook 2013, All Tables, Energy Prices by Sector and Source, Mountain, Reference case" at http://www.eia.gov/oiaf/aeo/tablebrowser/.

IDAHO POWER COMPANY
AVOIDED COST RATES FOR SEASONAL HYDRO PROJECTS
March XX, 2014
$/MWh
New Contracts and Replacement Contracts without Full Capacity Payments

Eligibility for these rates is limited to projects smaller than 10 aMW.

LEVELIZED							NON-LEVELIZED	
CONTRACT LENGTH (YEARS)	ON-LINE YEAR						CONTRACT YEAR	NON-LEVELIZED RATES
	2014	2015	2016	2017	2018	2019		
1	29.08	30.37	81.27	84.53	88.60	91.69	2014	29.08
2	29.70	54.82	82.84	86.49	90.08	92.94	2015	30.37
3	45.56	63.96	84.61	88.09	91.38	94.50	2016	81.27
4	54.18	69.41	86.18	89.46	92.85	96.21	2017	84.53
5	60.03	73.20	87.56	90.91	94.44	97.85	2018	88.60
6	64.33	76.06	88.98	92.45	95.99	99.21	2019	91.69
7	67.67	78.51	90.45	93.94	97.32	100.42	2020	94.30
8	70.50	80.72	91.89	95.25	98.51	101.52	2021	98.01
9	73.02	82.72	93.16	96.42	99.59	102.50	2022	102.22
10	75.27	84.44	94.32	97.50	100.57	103.45	2023	105.85
11	77.21	85.97	95.38	98.47	101.51	104.38	2024	107.90
12	78.92	87.33	96.34	99.41	102.42	105.29	2025	110.04
13	80.45	88.55	97.26	100.31	103.32	106.20	2026	112.15
14	81.81	89.68	98.15	101.19	104.20	107.12	2027	113.86
15	83.07	90.75	99.01	102.06	105.10	108.04	2028	116.36
16	84.24	91.76	99.86	102.92	105.99	108.99	2029	119.08
17	85.33	92.73	100.70	103.79	106.90	109.99	2030	121.85
18	86.38	93.68	101.54	104.67	107.86	111.02	2031	125.10
19	87.38	94.60	102.39	105.58	108.84	112.08	2032	128.76
20	88.35	95.52	103.26	106.52	109.84	113.16	2033	132.57
							2034	137.38
							2035	143.22
							2036	149.32
							2037	155.61
							2038	162.68
							2039	167.24

Note: A "seasonal hydro project" is defined as a generation facility which produces at least 55% of its annual generation during the months of June, July, and August. Order 32802.

Note: The rates shown in this table have been computed using the U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013 released May 2, 2013. See "Annual Energy Outlook 2013, All Tables, Energy Prices by Sector and Source, Mountain, Reference case" at http://www.eia.gov/oiaf/aeo/tablebrowser/.

IDAHO POWER COMPANY
AVOIDED COST RATES FOR OTHER PROJECTS
March XX, 2014
$/MWh
New Contracts and Replacement Contracts without Full Capacity Payments

Eligibility for these rates is limited to projects smaller than 10 aMW.

LEVELIZED							NON-LEVELIZED	
CONTRACT LENGTH (YEARS)	ON-LINE YEAR 2014	2015	2016	2017	2018	2019	CONTRACT YEAR	NON-LEVELIZED RATES
1	29.08	30.37	55.61	58.50	62.18	64.88	2014	29.08
2	29.70	42.49	56.99	60.27	63.48	65.95	2015	30.37
3	37.66	47.41	58.59	61.69	64.59	67.32	2016	55.61
4	42.28	50.68	59.98	62.89	65.88	68.85	2017	58.50
5	45.66	53.09	61.19	64.17	67.30	70.31	2018	62.18
6	48.27	55.00	62.44	65.53	68.68	71.50	2019	64.88
7	50.37	56.71	63.76	66.86	69.84	72.54	2020	67.10
8	52.24	58.35	65.04	68.00	70.86	73.47	2021	70.42
9	53.99	59.87	66.15	69.02	71.78	74.28	2022	74.22
10	55.59	61.18	67.16	69.94	72.60	75.07	2023	77.45
11	56.99	62.35	68.07	70.76	73.39	75.85	2024	79.08
12	58.23	63.40	68.88	71.55	74.16	76.61	2025	80.80
13	59.35	64.34	69.66	72.31	74.90	77.37	2026	82.48
14	60.34	65.21	70.41	73.04	75.65	78.14	2027	83.75
15	61.27	66.04	71.14	73.78	76.40	78.93	2028	85.82
16	62.14	66.83	71.86	74.51	77.16	79.74	2029	88.09
17	62.96	67.60	72.57	75.24	77.94	80.61	2030	90.40
18	63.75	68.36	73.28	76.00	78.77	81.51	2031	93.19
19	64.53	69.10	74.01	76.79	79.63	82.44	2032	96.39
20	65.28	69.85	74.77	77.61	80.51	83.40	2033	99.72
							2034	104.05
							2035	109.40
							2036	115.00
							2037	120.79
							2038	127.35
							2039	131.39

Note: "Other projects" refers to projects other than wind, solar, non-seasonal hydro, and seasonal hydro projects. These "Other projects" may include (but are not limited to): cogeneration, biomass, biogas, landfill gas, or geothermal projects.

Note: The rates shown in this table have been computed using the U.S. Energy Information Administration (EIA)'s Annual Energy Outlook 2013 released May 2, 2013. See "Annual Energy Outlook 2013, All Tables, Energy Prices by Sector and Source, Mountain, Reference case" at http://www.eia.gov/oiaf/aeo/tablebrowser/.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 28TH DAY OF FEBRUARY 2014, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-13-21, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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