

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 78**

In the Matter of  
IDAHO POWER COMPANY,  
2021 Integrated Resource Plan.

THE RENEWABLE ENERGY  
COALITION’S COMMENTS ON  
STAFF’S REPORT AND  
RECOMMENDATIONS

**I. INTRODUCTION**

The Renewable Energy Coalition (the “Coalition”) respectfully submits these Comments on Staff’s Report and recommendations for consideration by the Oregon Public Utility Commission (the “Commission” or “OPUC”) in the matter of Idaho Power Company’s (“Idaho Power’s”) 2021 Integrated Resource Plan (“IRP”). The Coalition continues to support its recommendations in its previous comments regarding qualifying facility (“QF”) planning assumptions and does not repeat those recommendations here. The Coalition appreciates the consideration Idaho Power has put into addressing the Coalition’s concerns, and Idaho Power’s thoroughness and responsiveness in the discovery process.

**II. COMMENTS**

The Coalition supports the recommendations related to QF assumptions in Staff’s October 28, 2022 report. Related to QF planning assumptions, Staff makes the following recommendations:

- Recommendation 22: Direct Idaho Power to revisit the assumed renewal rate of wind QFs.

- Recommendation 23: Direct Idaho Power to apply a reasonable forecast of new QFs beginning in the fifth year of the planning cycle.<sup>1</sup>

The Coalition supports both of Staff's recommendations and recommends the Commission adopt Staff's recommendations. Staff's recommendations are based upon, and do not recommend any revisions to, Idaho Power's continued planning assumption that 100 percent of non-wind QFs will renew after contract expiration. The Coalition also commends Idaho Power for developing an initial wind QF renewal rate. All QFs should be accurately forecasted which includes QF renewals, future QFs, and the timing of online dates for QFs. Accurately forecasting QFs helps to ensure QFs are paid for the capacity they provide. Staff's recommendations will lead to more reasonable and accurate QF forecasting. Thus, the Commission should adopt Staff's recommendations related to QF planning assumptions.

### **III. CONCLUSION**

The Commission should acknowledge Idaho Power's assumptions regarding QF renewals and adopt Staff's recommendations to direct Idaho Power to revisit its planning assumptions for wind QF renewals during the next IRP and apply a reasonable forecast of future QFs in the fifth year of the planning cycle in the next IRP.

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<sup>1</sup> Staff Report at 37 (Oct. 28, 2022).

Dated this 18th day of November 2022.

Respectfully submitted,

Sanger Law, PC

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