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March 12, 2019

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 2001
Idaho Power Company's Update of Avoided Cost Rates – Schedule 85,
Cogeneration and Small Power Production Standard Contract Rates

Dear Filing Center:

In compliance with Order No. 19-074 of Docket UM 2001, Idaho Power Company (“Idaho Power” or “Company”) hereby submits for filing its revised Schedule 85, Cogeneration and Small Power Production Standard Contract Rates, Sheet Nos. 85-6 through 85-8, in both clean and redlined formats. The Company’s filing includes updates to Idaho Power’s standard avoided cost schedule (Schedule 85) and its standard avoided costs.

Twelfth Revised Sheet No. 85-6	Schedule 85	Cogeneration and Small Power Production Standard Contract Rates
Ninth Revised Sheet No. 85-7	Schedule 85	Cogeneration and Small Power Production Standard Contract Rates
Eighth Revised Sheet No. 85-8	Schedule 85	Cogeneration and Small Power Production Standard Contract Rates

This filing is in accordance with Order No. 19-074 of Docket UM 2001, issued March 4, 2019, which requires utilities to file an update of avoided cost prices consistent with the Public Utility Commission of Oregon (“Commission”) Staff’s (“Staff”) Report dated February 20, 2019 (“Report”). Staff’s Report proposed implementing an interim measure, during the Commission’s longer-term investigation into PURPA implementation (UM

2000), to better align avoided cost prices paid to Qualifying Facilities with market trends.¹ The goal of Staff's interim measure is to ensure that standard avoided cost prices meet the customer indifference standards.² Staff's Report refers to Path C, which requires the utilities to file an "enhanced" avoided cost update to allow the price change to be effective on April 23, 2019.³ Path C, which was initially proposed by Staff in its February 4, 2019, Report, directs utilities to make updates to a limited set of inputs to the existing standard avoided cost model, and no changes to the methodology. The February 4, 2019, Staff Report also directs utilities to use preliminary resource cost data from the 2019 Integrated Resource Plans ("IRP") in progress.⁴

This filing updates standard avoided cost rates utilizing updated forward electricity and natural gas prices, updated capital costs and fixed operations and maintenance costs of the avoided resource, and an updated discount rate,⁵ which is consistent with Staff's proposed Path C. For updated natural gas prices, Idaho Power utilized the Long-term Henry Hub and Sumas Basis Annuals from S&P Global Platt's Long-term Forecast, adjusted for transport for Idaho City Gate delivery, which is the same forecast used in Idaho Power's 2019 IRP. Idaho Power also updated on- and off-peak electric market prices, utilizing forward monthly market quoted prices at mid-Columbia from Inter-Continental Exchange as of February 27, 2019. Lastly, the Company updated capital costs and fixed operations and maintenance costs of the avoided resource consistent with the 2019 IRP, as well as the discount rate.

The workpapers used to prepare this filing have been filed with the Commission at the following electronic address: puc.workpapers@state.or.us.

If you have any questions, please do not hesitate to contact Michael Youngblood at (208) 388-2882, Nicole Blackwell at (208) 388-5764 or Donovan E. Walker at (208) 388-5317.

Sincerely,

/s/Adam Lowney

Adam Lowney

Attorney for Idaho Power Company

ACL:csb
Attachments

¹ *Investigation into Interim PUPRA Action*, Docket No. UM 2001, Public Utility Commission of Oregon Staff Report at 2 (Feb. 20, 2019)

² *Id.* at 3.

³ *Id.* at 4.

⁴ *Investigation into PUPRA Action*, Docket No. UM 2001, Public Utility Commission of Oregon Staff Report at 6 (Feb. 4, 2019).

⁵ *Id.* at 5.

SCHEDULE 85
COGENERATION AND SMALL POWER
PRODUCTION STANDARD
CONTRACT RATES
 (Continued)

AVOIDED COST PRICE
Standard Avoided Cost Prices for Baseload QF

Year	On-Peak	Off-Peak
	\$/MWh	\$/MWh
	(a)	(b)
2019	\$42.87	\$31.49
2020	\$34.55	\$23.55
2021	\$39.54	\$27.23
2022	\$39.74	\$28.00
2023	\$40.35	\$29.06
2024	\$41.08	\$30.18
2025	\$41.99	\$31.31
2026	\$50.32	\$30.13
2027	\$52.08	\$31.46
2028	\$53.47	\$32.42
2029	\$54.63	\$33.14
2030	\$54.74	\$32.80
2031	\$55.71	\$33.31
2032	\$57.38	\$34.51
2033	\$57.40	\$34.04
2034	\$58.35	\$34.50
2035	\$59.69	\$35.34
2036	\$62.19	\$37.33
2037	\$63.95	\$38.57
2038	\$65.25	\$39.34
2039	\$65.80	\$39.34
2040	\$66.43	\$39.42
2041	\$67.13	\$39.55
2042	\$67.85	\$39.69
2043	\$68.58	\$39.83

(C)

 (C)

Notes:

- (a) Value of on-peak capacity allocated to on-peak hours of a Baseload resource. 2019-2025 On-peak Market Prices.
- (b) Fuel and Capitalized Energy Cost of the Proxy CCCT. 2019-2025 Off-Peak Market Prices.

(C)
 (C)

CANCELS

~~TENTH~~ ELEVENTH REVISED SHEET NO. 85-6

<u>2025</u>	<u>\$41.99</u>	<u>\$31.31</u>
<u>2026</u>	<u>\$50.32</u>	<u>\$30.13</u>
<u>2027</u>	<u>\$52.08</u>	<u>\$31.46</u>
<u>2028</u>	<u>\$53.47</u>	<u>\$32.42</u>
<u>2029</u>	<u>\$54.63</u>	<u>\$33.14</u>
<u>2030</u>	<u>\$54.74</u>	<u>\$32.80</u>
<u>2031</u>	<u>\$55.71</u>	<u>\$33.31</u>
<u>2032</u>	<u>\$57.38</u>	<u>\$34.51</u>
<u>2033</u>	<u>\$57.40</u>	<u>\$34.04</u>
<u>2034</u>	<u>\$58.35</u>	<u>\$34.50</u>
<u>2035</u>	<u>\$59.69</u>	<u>\$35.34</u>
<u>2036</u>	<u>\$62.19</u>	<u>\$37.33</u>
<u>2037</u>	<u>\$63.95</u>	<u>\$38.57</u>
<u>2038</u>	<u>\$65.25</u>	<u>\$39.34</u>
<u>2039</u>	<u>\$65.80</u>	<u>\$39.34</u>
<u>2040</u>	<u>\$66.43</u>	<u>\$39.42</u>
<u>2041</u>	<u>\$67.13</u>	<u>\$39.55</u>
<u>2042</u>	<u>\$67.85</u>	<u>\$39.69</u>
<u>2043</u>	<u>\$68.58</u>	<u>\$39.83</u>

Notes:

- (a) Value of on-peak capacity allocated to on-peak hours of a Baseload resource. 201~~89~~-2025 On-peak Market Prices.
Fuel and Capitalized Energy Cost of the Proxy CCCT. 201~~89~~-
- (b) 2025 Off-Peak Market Prices.

SCHEDULE 85
 COGENERATION AND SMALL POWER
 PRODUCTION STANDARD
 CONTRACT RATES
 (Continued)

Standard Avoided Cost Prices with Integration Charges for a Wind QF

- - Year	- On-Peak - -(\$/MWh)	- Off-Peak - \$/MWh	Wind Integration Charge \$/MWh	On-Peak with Integration Charge \$/MWh	Off-Peak with Integration Charge \$/MWh
-	(a)	(b)	(c)	(d) (a)-(c)	(e) (b)-(c)
-	-	-	-	-	-
2018	\$21.65	\$14.62	\$17.51	\$4.14	(\$2.89)
2019	\$23.12	\$16.90	\$18.03	\$5.09	(\$1.13)
2020	\$25.50	\$19.12	\$18.57	\$6.93	\$0.55
2021	\$28.93	\$22.45	\$19.13	\$9.80	\$3.32
2022	\$30.93	\$24.22	\$19.70	\$11.23	\$4.52
2023	\$32.49	\$25.67	\$20.29	\$12.20	\$5.38
2024	\$33.83	\$26.79	\$20.90	\$12.93	\$5.89
2025	\$34.95	\$27.88	\$21.53	\$13.42	\$6.35
2026	\$36.63	\$33.12	\$22.18	\$14.45	\$10.94
2027	\$38.16	\$34.58	\$22.84	\$15.32	\$11.74
2028	\$39.41	\$35.75	\$23.53	\$15.88	\$12.22
2029	\$40.36	\$36.63	\$24.23	\$16.13	\$12.40
2030	\$41.07	\$37.26	\$24.96	\$16.11	\$12.30
2031	\$41.93	\$38.04	\$25.71	\$16.22	\$12.33
2032	\$42.65	\$38.68	\$26.48	\$16.17	\$12.20
2033	\$43.16	\$39.10	\$27.27	\$15.89	\$11.83
2034	\$43.74	\$39.60	\$28.09	\$15.65	\$11.51
2035	\$44.55	\$40.32	\$28.93	\$15.62	\$11.39
2036	\$45.63	\$41.31	\$29.80	\$15.83	\$11.51
2037	\$46.43	\$42.02	\$30.70	\$15.73	\$11.32
2038	\$47.69	\$43.19	\$31.62	\$16.07	\$11.57
2039	\$49.21	\$44.61	\$32.57	\$16.64	\$12.04
2040	\$50.38	\$45.69	\$33.25	\$17.13	\$12.44
2041	\$51.44	\$46.65	\$33.95	\$17.49	\$12.70
2042	\$52.56	\$47.67	\$34.66	\$17.90	\$13.01

Notes:

- (a) Value of on-peak capacity allocated to on-peak hours of a Wind resource
- (b) Fuel and Capitalized Energy Cost of the Proxy CGCT
- (c) Wind Integration Charges based on current penetration level of 701-800 MW. The Integration Charge will be updated when the next penetration level is reached.
- (d) 2018 – 2025 On-Peak Market Prices
- (e) 2018 – 2025 Off-Peak Market Prices

Standard Avoided Cost Prices with Integration Charges for a Wind QF

- - Year	- On-Peak - -(\$/MWh)	- Off-Peak - \$/MWh	Wind Integration Charge \$/MWh	On-Peak with Integration Charge \$/MWh	Off-Peak with Integration Charge \$/MWh
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<u>Year</u>	<u>-</u>	<u>-</u>	<u>Charge</u>	<u>Integration Charge</u>	<u>Integration Charge</u>
	<u>(\$/MWh)</u>	<u>\$/MWh</u>	<u>\$/MWh</u>	<u>\$/MWh</u>	<u>\$/MWh</u>
	<u>(a)</u>	<u>(b)</u>	<u>(c)</u>	<u>(d)</u>	<u>(e)</u>
				<u>(a)-(c)</u>	<u>(b)-(c)</u>
<u>2019</u>	<u>\$42.87</u>	<u>\$31.49</u>	<u>\$18.03</u>	<u>\$24.84</u>	<u>\$13.46</u>
<u>2020</u>	<u>\$34.55</u>	<u>\$23.55</u>	<u>\$18.57</u>	<u>\$15.98</u>	<u>\$4.98</u>
<u>2021</u>	<u>\$39.54</u>	<u>\$27.23</u>	<u>\$19.13</u>	<u>\$20.41</u>	<u>\$8.10</u>
<u>2022</u>	<u>\$39.74</u>	<u>\$28.00</u>	<u>\$19.70</u>	<u>\$20.04</u>	<u>\$8.30</u>
<u>2023</u>	<u>\$40.35</u>	<u>\$29.06</u>	<u>\$20.29</u>	<u>\$20.06</u>	<u>\$8.77</u>
<u>2024</u>	<u>\$41.08</u>	<u>\$30.18</u>	<u>\$20.90</u>	<u>\$20.18</u>	<u>\$9.28</u>
<u>2025</u>	<u>\$41.99</u>	<u>\$31.31</u>	<u>\$21.53</u>	<u>\$20.46</u>	<u>\$9.78</u>
<u>2026</u>	<u>\$33.84</u>	<u>\$30.13</u>	<u>\$22.18</u>	<u>\$11.66</u>	<u>\$7.95</u>
<u>2027</u>	<u>\$35.25</u>	<u>\$31.46</u>	<u>\$22.84</u>	<u>\$12.41</u>	<u>\$8.62</u>
<u>2028</u>	<u>\$36.29</u>	<u>\$32.42</u>	<u>\$23.53</u>	<u>\$12.76</u>	<u>\$8.89</u>
<u>2029</u>	<u>\$37.09</u>	<u>\$33.14</u>	<u>\$24.23</u>	<u>\$12.86</u>	<u>\$8.91</u>
<u>2030</u>	<u>\$36.84</u>	<u>\$32.80</u>	<u>\$24.96</u>	<u>\$11.88</u>	<u>\$7.84</u>
<u>2031</u>	<u>\$37.43</u>	<u>\$33.31</u>	<u>\$25.71</u>	<u>\$11.72</u>	<u>\$7.60</u>
<u>2032</u>	<u>\$38.72</u>	<u>\$34.51</u>	<u>\$26.48</u>	<u>\$12.24</u>	<u>\$8.03</u>
<u>2033</u>	<u>\$38.34</u>	<u>\$34.04</u>	<u>\$27.27</u>	<u>\$11.07</u>	<u>\$6.77</u>
<u>2034</u>	<u>\$38.89</u>	<u>\$34.50</u>	<u>\$28.09</u>	<u>\$10.80</u>	<u>\$6.41</u>
<u>2035</u>	<u>\$39.82</u>	<u>\$35.34</u>	<u>\$28.93</u>	<u>\$10.89</u>	<u>\$6.41</u>
<u>2036</u>	<u>\$41.90</u>	<u>\$37.33</u>	<u>\$29.80</u>	<u>\$12.10</u>	<u>\$7.53</u>
<u>2037</u>	<u>\$43.24</u>	<u>\$38.57</u>	<u>\$30.70</u>	<u>\$12.54</u>	<u>\$7.87</u>
<u>2038</u>	<u>\$44.11</u>	<u>\$39.34</u>	<u>\$31.62</u>	<u>\$12.49</u>	<u>\$7.72</u>
<u>2039</u>	<u>\$44.21</u>	<u>\$39.34</u>	<u>\$32.57</u>	<u>\$11.64</u>	<u>\$6.77</u>
<u>2040</u>	<u>\$44.39</u>	<u>\$39.42</u>	<u>\$33.25</u>	<u>\$11.14</u>	<u>\$6.17</u>
<u>2041</u>	<u>\$44.62</u>	<u>\$39.55</u>	<u>\$33.95</u>	<u>\$10.67</u>	<u>\$5.60</u>
<u>2042</u>	<u>\$44.87</u>	<u>\$39.69</u>	<u>\$34.66</u>	<u>\$10.21</u>	<u>\$5.03</u>
<u>2043</u>	<u>\$45.12</u>	<u>\$39.83</u>	<u>\$35.39</u>	<u>\$9.73</u>	<u>\$4.44</u>

Notes

- (a) Value of on-peak capacity allocated to on-peak hours of a Wind resource
- (b) Fuel and Capitalized Energy Cost of the Proxy CCCT
- (c) Wind Integration Charges based on current penetration level of 701 - 800 MW
The integration charge will be updated when the next penetration level is reached.
- (d) 2019-2025 On-Peak Market Prices
- (e) 2019-2025 Off-Peak Market Prices

SCHEDULE 85
 COGENERATION AND SMALL POWER
 PRODUCTION STANDARD
 CONTRACT RATES
 (Continued)

Standard Avoided Cost Prices with Integration Charges for a PV Solar QF

- Year	- On-Peak - (\$/MWh) (a)	- Off-Peak - \$/MWh (b)	PV Solar Integration Charge \$/MWh (c)	On-Peak with Integration Charge \$/MWh (d) (a)-(c)	Off-Peak with Integration Charge \$/MWh (e) (b)-(c)
-	-	-	-	-	-
2018	\$21.65	\$14.62	\$0.56	\$21.09	\$14.06
2019	\$23.12	\$16.90	\$0.57	\$22.55	\$16.33
2020	\$25.50	\$19.12	\$0.59	\$24.91	\$18.53
2021	\$28.93	\$22.45	\$0.60	\$28.33	\$21.85
2022	\$30.93	\$24.22	\$0.61	\$30.32	\$23.61
2023	\$32.49	\$25.67	\$0.63	\$31.86	\$25.04
2024	\$33.83	\$26.79	\$0.64	\$33.19	\$26.15
2025	\$34.95	\$27.88	\$0.66	\$34.29	\$27.22
2026	\$56.76	\$33.12	\$0.67	\$56.09	\$32.45
2027	\$58.72	\$34.58	\$0.68	\$58.04	\$33.90
2028	\$60.39	\$35.75	\$0.70	\$59.69	\$35.05
2029	\$61.79	\$36.63	\$0.71	\$61.08	\$35.92
2030	\$62.95	\$37.26	\$0.73	\$62.22	\$36.53
2031	\$64.27	\$38.04	\$0.75	\$63.52	\$37.29
2032	\$65.46	\$38.68	\$0.76	\$64.70	\$37.92
2033	\$66.45	\$39.10	\$0.78	\$65.67	\$38.32
2034	\$67.52	\$39.60	\$0.80	\$66.72	\$38.80
2035	\$68.83	\$40.32	\$0.81	\$68.02	\$39.51
2036	\$70.42	\$41.34	\$0.83	\$69.59	\$40.48
2037	\$71.74	\$42.02	\$0.85	\$70.89	\$41.17
2038	\$73.53	\$43.19	\$0.87	\$72.66	\$42.32
2039	\$75.59	\$44.64	\$0.89	\$74.70	\$43.72
2040	\$77.32	\$45.69	\$0.91	\$76.41	\$44.78
2041	\$78.94	\$46.65	\$0.93	\$78.01	\$45.72
2042	\$80.63	\$47.67	\$0.95	\$79.68	\$46.72

(C)

Standard Avoided Cost Prices with Integration Charges for a PV Solar QF

(C)

- Year	- On-Peak - (\$/MWh) (a)	- Off-Peak - \$/MWh (b)	PV Solar Integration Charge \$/MWh (c)	On-Peak with Integration Charge \$/MWh (d) (a)-(c)	Off-Peak with Integration Charge \$/MWh (e) (b)-(c)
-	-	-	-	-	-

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CANCELS

~~SIXTH~~SEVENTH REVISED SHEET NO. 85-8

<u>2019</u>	<u>\$42.87</u>	<u>\$31.49</u>	<u>\$0.57</u>	<u>\$42.30</u>	<u>\$30.92</u>
<u>2020</u>	<u>\$34.55</u>	<u>\$23.55</u>	<u>\$0.59</u>	<u>\$33.96</u>	<u>\$22.96</u>
<u>2021</u>	<u>\$39.54</u>	<u>\$27.23</u>	<u>\$0.60</u>	<u>\$38.94</u>	<u>\$26.63</u>
<u>2022</u>	<u>\$39.74</u>	<u>\$28.00</u>	<u>\$0.61</u>	<u>\$39.13</u>	<u>\$27.39</u>
<u>2023</u>	<u>\$40.35</u>	<u>\$29.06</u>	<u>\$0.63</u>	<u>\$39.72</u>	<u>\$28.43</u>
<u>2024</u>	<u>\$41.08</u>	<u>\$30.18</u>	<u>\$0.64</u>	<u>\$40.44</u>	<u>\$29.54</u>
<u>2025</u>	<u>\$41.99</u>	<u>\$31.31</u>	<u>\$0.66</u>	<u>\$41.33</u>	<u>\$30.65</u>
<u>2026</u>	<u>\$55.16</u>	<u>\$30.13</u>	<u>\$0.67</u>	<u>\$54.49</u>	<u>\$29.46</u>
<u>2027</u>	<u>\$57.02</u>	<u>\$31.46</u>	<u>\$0.68</u>	<u>\$56.34</u>	<u>\$30.78</u>
<u>2028</u>	<u>\$58.51</u>	<u>\$32.42</u>	<u>\$0.70</u>	<u>\$57.81</u>	<u>\$31.72</u>
<u>2029</u>	<u>\$59.78</u>	<u>\$33.14</u>	<u>\$0.71</u>	<u>\$59.07</u>	<u>\$32.43</u>
<u>2030</u>	<u>\$60.00</u>	<u>\$32.80</u>	<u>\$0.73</u>	<u>\$59.27</u>	<u>\$32.07</u>
<u>2031</u>	<u>\$61.09</u>	<u>\$33.31</u>	<u>\$0.75</u>	<u>\$60.34</u>	<u>\$32.56</u>
<u>2032</u>	<u>\$62.87</u>	<u>\$34.51</u>	<u>\$0.76</u>	<u>\$62.11</u>	<u>\$33.75</u>
<u>2033</u>	<u>\$62.99</u>	<u>\$34.04</u>	<u>\$0.78</u>	<u>\$62.21</u>	<u>\$33.26</u>
<u>2034</u>	<u>\$64.06</u>	<u>\$34.50</u>	<u>\$0.80</u>	<u>\$63.26</u>	<u>\$33.70</u>
<u>2035</u>	<u>\$65.53</u>	<u>\$35.34</u>	<u>\$0.81</u>	<u>\$64.72</u>	<u>\$34.53</u>
<u>2036</u>	<u>\$68.15</u>	<u>\$37.33</u>	<u>\$0.83</u>	<u>\$67.32</u>	<u>\$36.50</u>
<u>2037</u>	<u>\$70.03</u>	<u>\$38.57</u>	<u>\$0.85</u>	<u>\$69.18</u>	<u>\$37.72</u>
<u>2038</u>	<u>\$71.46</u>	<u>\$39.34</u>	<u>\$0.87</u>	<u>\$70.59</u>	<u>\$38.47</u>
<u>2039</u>	<u>\$72.14</u>	<u>\$39.34</u>	<u>\$0.89</u>	<u>\$71.25</u>	<u>\$38.45</u>
<u>2040</u>	<u>\$72.91</u>	<u>\$39.42</u>	<u>\$0.91</u>	<u>\$72.00</u>	<u>\$38.51</u>
<u>2041</u>	<u>\$73.74</u>	<u>\$39.55</u>	<u>\$0.93</u>	<u>\$72.81</u>	<u>\$38.62</u>
<u>2042</u>	<u>\$74.60</u>	<u>\$39.69</u>	<u>\$0.95</u>	<u>\$73.65</u>	<u>\$38.74</u>
<u>2043</u>	<u>\$75.47</u>	<u>\$39.83</u>	<u>\$0.97</u>	<u>\$74.50</u>	<u>\$38.86</u>

Notes:

- (a) Value of on-peak capacity allocated to on-peak hours of a Fixed PV Utility Solar resource
- (b) Fuel and Capitalized Energy Cost of the Proxy CCCT
- (c) Solar Integration Charges based on current penetration level of 301-400 MW. The Integration Charge will be updated when the next penetration level is reached.
- (d) 201~~89~~ - 2025 On-Peak Market Prices
- (e) 201~~89~~ - 2025 Off-Peak Market Prices