

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 631

In the Matter of Rulemaking to Address
Procedures, Terms, and Conditions
Associated with Qualifying Facilities (QF)
Standard Contracts

JOINT REPLY COMMENTS OF THE
COMMUNITY RENEWABLE ENERGY
ASSOCIATION, NORTHWEST &
INTERMOUNTAIN POWER
PRODUCERS COALITION, AND
RENEWABLE ENERGY COALITION
ON STAFF’S PROPOSED RULES
GROUP 1

I. INTRODUCTION

The Community Renewable Energy Association (“CREA”), the Northwest & Intermountain Power Producers Coalition (“NIPPC”), and the Renewable Energy Coalition (the “Coalition”) (collectively the “QF Trade Associations”) respectfully submit these Reply Comments on Group 1 Issues in response to Portland General Electric Company (“PGE”), PacifiCorp dba Pacific Power (“PacifiCorp”), and Idaho Power Company’s (“Idaho Power”) (collectively the “Joint Utilities”) Initial Comments.¹ These Comments address Staff’s latest draft of proposed administrative rules related to contracting process and power purchase agreement (“PPA”) terms circulated October 14, 2021 (“Staff’s Draft Rules”)² for implementation of the Public Utility Regulatory Policies Act of 1978 (“PURPA”) by the Public Utility Commission of Oregon (“OPUC” or the “Commission”).

The QF Trade Associations and Joint Utilities participated in the informal rulemaking process, and both groups have largely made the same or similar arguments in previous written

¹ See generally Joint Utilities’ Initial Comments (Mar. 11, 2022).

² See Order No. 21-353, Appendix A at 14-41 (Oct. 26, 2021).

and oral arguments. Given this familiarity with the Joint Utilities’ arguments, the QF Trade Associations’ March 11, 2022 Comments largely anticipated and responded to the Joint Utilities’ March 11, 2022 Comments. In lieu of repeating previous comments, the QF Trade Associations identify the Joint Utilities’ recommendations below and direct the Commission to review the relevant portion of the QF Trade Associations’ March 11, 2022 Comments, which respond to those arguments. In limited areas in which new arguments were raised, or the QF Trade Associations’ March 11, 2022 Comments did not fully respond to the Joint Utilities, these comments respond to discrete and specific arguments.

II. REPLY COMMENTS

A. Comparison of the Joint Utilities’ Recommendations to the QF Trade Associations’ Recommendations

Joint Utilities’ Recommendations	The QF Trade Associations’ Recommendations
For New Rule #2, the Joint Utilities are generally supportive, but it should include a subsection that identifies the Commission as the entity responsible for reviewing project eligibility disputes and other related questions that arise during the PPA contracting process, such as whether the QF at issue qualifies as family-owned or community-based for purposes of the same site rule. ³	Recommend several changes to New Rule #2 such as allowing the QF to retain ownership of the renewable energy certificates and using the five-mile rule stipulation language from UM 1129. ⁴
For New Rule #3, the Joint Utilities are generally supportive, but recommend: 1) a requirement to have an interconnection study supporting an on-line date occurring	Recommend several changes to New Rule #3 such as: 1) do not require a QF to demonstrate the ability to obtain QF status in order to obtain a draft PPA from a

³ Joint Utilities’ Initial Comments at 13.

⁴ Joint Comments of CREA, NIPPC, and the Coalition at 3-6 (Mar. 11, 2022).

<p>between the third and fourth year after effective date if a developer can select a Schedule Commercial Operation Date (“COD”) between three and four years from execution date of the PPA; 2) revise New Rule #3 to retain the 15-business-day turnaround period for a utility to provide a revised draft standard PPA to a QF in all circumstances, but if the Commission ultimately decides to adopt a 10-business-day turnaround in general, the Joint Utilities request that, at a minimum, a longer response period be allowed under circumstances where additional care is required to ensure the completeness and accuracy of the PPA.; 3) revise New Rule #3(7) and (8) to allow the 15-business-day turnaround period for providing a final executable PPA or counter-signing a PPA; 4) inclusion of the requirement that a QF provide “a 12 x 24 power delivery schedule;” 5) inclusion of the catch-all, New Rule #3(2)(c)(N), which would allow utilities flexibility in requesting information according to their unique resource planning needs when determining eligibility for a draft PPA; 6) inclusion of New Rule #3(2)(c)(B), which ensures that utilities have the information necessary to determine whether the QF meets eligibility requirements; and 7) inclusion of the requirement in New Rule #3(2)(b) that a QF provide evidence of site control and the clear criteria in subsections (A)-(C) regarding the required evidence.⁵</p>	<p>utility; 2) further clarification on what is needed for evidence of site control as long as the requirements are not too onerous; 3) allow a QF to identify multiple points of interconnection with the request of a draft PPA; 4) deleting the catch-all provision added in Staff’s Proposed New Rule #3(2)(c)(N) regarding information required to obtain a draft standard PPA; 5) impose a shorter timeline for non-substantive changes, such as correction of typos, during the PPA contracting timeline; and 6) explicitly recognize a good faith requirement in the contracting process.⁶</p>
<p>The Joint Utilities generally support OAR 860-029-0120 Draft Rules, but recommend: 1) not delaying the start of the development period—and therefore the Scheduled COD—for the Network</p>	<p>The QF Trade Associations recommend several changes such as: 1) revising the contract term indicated in Staff’s Proposed Rules at OAR 860-029-0120(2) and existing OAR 860-029-0130(2) to</p>

⁵ Joint Utilities’ Initial Comments at 13-17.

⁶ Joint Comments of CREA, NIPPC, and the Coalition at 6-20.

<p>Upgrade cost-allocation process; 2) the Commission to cap the interval between PPA execution and Scheduled COD at three years, without exception, but if the Commission decides to permit the election of a development period in excess of three years, it should permit such an election only under the circumstances set forth under subsection 6(b)(a) and delete subsection 6(b)(B) entirely; 3) deleting the provisions allowing a QF to terminate its PPA within six months after it obtains more information about its ability to interconnect; 4) the QF should not be permitted to extend its Scheduled COD or extend any cure period related to meeting the Scheduled COD more than 180 days due to a Force Majeure event; 5) shorter cure period; and 6) revisions to OAR 860-029-0120(20) to expand Commission jurisdiction.⁷</p>	<p>incorporate the 20-year fixed price term required by Oregon law, rather than the 15-year fixed-price term proposed in Staff’s Proposed Rules; 2) a longer lead time than three years where it is needed for the interconnecting utility to complete the interconnection and do not allow utility to unreasonably withhold consent; 3) the PPA should simply excuse a QF’s delayed commercial operation for all “utility-caused delays” without trying to exclude types of utility caused delays; 4) the 15-year fixed-price and 20-year purchase period run from the commercial operation date, not the scheduled commercial operation date; 5) removing OAR 860-029-0120(20) of Staff’s Proposed Rules, which requires contracts to include language referencing “the jurisdiction of those governmental agencies and courts having control over either party or [the contract.]”⁸</p>
<p>Regarding insurance and security, the Joint Utilities recommend: 1) removing the provision exempting QFs under 200 kW from insurance requirements altogether and require QFs under 200 kW to maintain \$2 million in insurance; 2) continuing to require QFs to post project development security within 30 days after executing the PPA and post Security in the form of Cash Escrow or a Letter of Credit; and 3) the rules specify the amount of Project Development and Default Security that a QF PPA can require, rather than leaving this issue to be addressed in the compliance phase.⁹</p>	<p>Regarding security, the QF Trade Associations recommend adhering to current policy for small QFs and revising Staff’s Proposed Rules to the extent they conflict with this longstanding Commission policy. Specifically, the Commission should maintain its policies of exempting creditworthy QFs from any security requirements and allowing QFs unable to demonstrate creditworthiness to post security through step-in rights or senior liens.¹⁰</p> <p>Regarding insurance, the QF Trade Associations did not make recommendation in the March 11, 2022</p>

⁷ Joint Utilities’ Initial Comments at 17-26.

⁸ Joint Comments of CREA, NIPPC, and the Coalition at 20-28.

⁹ Joint Utilities’ Initial Comments at 25-26.

¹⁰ Joint Comments of CREA, NIPPC, and the Coalition at 34-51.

	Comments. The QF Trade Associations support the exemption from insurance requirements for QFs under 200 kW. Also, the QF Trade Associations believe reasonable insurance requirements for projects above 200 kW would be \$1 million per occurrence and \$2 million in aggregate insurance.
Joint Utilities state no recommendation on a general reasonableness argument, but oppose specific reasonableness language because it would lead to litigation and disputes.	Add a requirement that, in implementing these administrative rules related to contracting process and power purchase agreement terms, the utilities must act reasonably at all times. ¹¹
Joint Utilities state no recommendation on this.	Revise rules to clarify applicability. ¹²

B. Contracting Timeline and Response Deadlines

The Joint Utilities recommend retaining a fifteen-business day turn around to provide a revised draft standard PPA and a final executable PPA and countersign a PPA that the QF signed.¹³ The Joint Utilities reason “there is no evidence on the record of this or any other proceeding suggesting that a 15-business-day interval is either unreasonable or causes any harm to the QFs.”¹⁴ This is incorrect as there is ample evidence that utilities have used the long time period to respond to information requests and various PPA drafts to delay the contracting process and cause harm to a QF.¹⁵

¹¹ Joint Comments of CREA, NIPPC, and the Coalition at 29-31.

¹² Joint Comments of CREA, NIPPC, and the Coalition at 31-34.

¹³ Joint Utilities’ Initial Comments at 14-16.

¹⁴ Joint Utilities’ Initial Comments at 14.

¹⁵ See, e.g., *International Paper Co. v. PacifiCorp*, Docket No. UM 1449, Complaint at ¶¶ 5-16, 23-25, 28-31 (Sept. 4, 2009); *Bottlenose Solar LLC v. PGE*, Docket No. UM 1877, Complaint at ¶¶ 14-27, 31-33, 36-59 (Aug. 7, 2017); *Falls Creek Hydro LP v. PGE*,

Generally, QFs select a time to begin the negotiation process that will allow them enough time to complete the process and sign a PPA before avoided cost prices change. Utility delays in this process can harm a QF because the QF can become exposed to changes in avoided cost prices even if the QF planned enough time for contract negotiations absent utility delays.

There are various ways a utility can delay the contracting process such as sending a request for information late, providing unclear requests that a QF must clarify, providing a draft PPA late, delays in responding to emails, and more. Because the terms of these contracts are standardized, there are fewer terms that a utility can require a QF to negotiate, and it is not necessary to have extended response time periods such as fifteen business days because the utility is generally just filling in blanks of the standard PPA with QF specific information or answering typical questions. Thus, an overall fifteen business day response period is unreasonable because it is unnecessary in all circumstances, and it can be used as a delay tactic by the utilities to harm a QF.¹⁶

Docket No. UM 1859, Complaint at ¶¶ 12-40, 47-50, 54-57 (Aug. 7, 2017); *Red Prairie Solar LLC v. PGE*, Docket No. UM 1860, Complaint at ¶¶ 19-29, 33-50, 56-59 (Aug. 7, 2017); *Volcano Solar LLC v. PGE*, Docket No. UM 1861, Complaint at ¶¶ 19-29, 33-50, 56-59 (Aug. 7, 2017); *Tickle Creek Solar LLC v. PGE*, Docket No. UM 1862, Complaint at ¶¶ 15-27, 31-46, 52-54 (Aug. 7, 2017). *See also generally*, *SSD Clackamas 1 LLC v. PGE*, Docket No. UM 1869; *SSD Clackamas 2 LLC v. PGE*, Docket No. UM 1870; *SSD Clackamas 3 LLC v. PGE*, Docket No. UM 1883; *SSD Clackamas 4 LLC v. PGE*, Docket No. UM 1864; *SSD Clackamas 6 LLC v. PGE*, Docket No. UM 1868; *SSD Clackamas 7 LLC v. PGE*, Docket No. UM 1866; *SSD Marion 1 LLC v. PGE*, Docket No. UM 1865; *SSD Marion 2 LLC v. PGE*, Docket No. UM 1867; *SSD Marion 3 LLC v. PGE*, Docket No. UM 1871; *SSD Marion 4 LLC v. PGE*, Docket No. UM 1863; *SSD Marion 5 LLC v. PGE*, Docket No. UM 1872; *SSD Marion 6 LLC v. PGE*, Docket No. UM 1873; *SSD Yamhill 1 LLC v. PGE*, Docket No. UM 1874.

¹⁶ See Joint Comments of CREA, NIPPC, and the Coalition at 17-20.

The Joint Utilities also recommend that the fifteen-business day period at least apply when there is a material change to a draft PPA such as “[a]ny change to avoided cost pricing or any other circumstances outside the utility’s control that require a substantive modification be made to the PPA.”¹⁷ The QF Trade Associations believe this is exactly the type of situation where a shorter response period is necessary to avoid surprise utility filings that could result in lower avoided cost prices and harm a QF.¹⁸ Thus, the QF Trade Associations recommend shorter time periods for the utility to respond as outline in earlier comments,¹⁹ but especially when a utility may file a surprise regulatory filing such as a filing changing avoided cost prices.

C. Security

The Joint Utilities recommend the rules allow standard PPAs to require Development Security up to \$150 per kilowatt-hour (“kWh”) and Default Security up to \$50 per kWh.²⁰ The QF Trade Associations believe this is a typo and the Joint Utilities meant to state require Development Security up to \$150 *per kW* and Default Security up to \$50 *per kW*. If this was not a typo, then the amount of security due would be unrealistically high and the QF Trade Associations strongly oppose this per kWh security requirement.

Even if the Commission were to agree to require some amount of liquid security from small QFs, the Joint Utilities’ proposed security amounts are far in excess of what has been required elsewhere. Indeed, the Joint Utilities’ recommendation – \$150 per kW for Project Development Security and \$50 per kW for Default Security – is over three times as punitive as

¹⁷ Joint Utilities’ Initial Comments at 15.

¹⁸ See, e.g., *Bottlenose Solar LLC v. PGE*, Docket No. UM 1877, Complainant’s Cross-Motion for Summary Judgment (Apr. 6, 2018).

¹⁹ Joint Comments of CREA, NIPPC, and the Coalition at 17-20.

²⁰ Joint Utilities’ Initial Comments at 25.

the policy adopted in Idaho. For small QFs, the Idaho Public Utilities Commission (“IPUC”) has imposed only a liquid security requirement of \$45 per kW of nameplate capacity prior to commercial operation – equivalent to the “Project Development Security” under consideration here.²¹ Under that Idaho policy, there is no ongoing retention of the liquid security (or any other liquid security) after the commercial operation date.²² Additionally, the IPUC policy exempts existing QFs renewing their contracts from the requirement to post security.²³ Thus, the Joint Utilities propose that Oregon should adopt a policy that is more than three times as punitive and detrimental to small-scale renewable energy developers than that implemented by Idaho.

In Washington, Puget Sound Energy and Avista do not have development or default security amounts in their standard small PURPA PPAs.²⁴ In Washington, PacifiCorp’s development security is \$25 per kW for new QFs, and default security is \$50 per kW for new and existing/renewing QFs.²⁵ The Joint Utilities are proposing security amounts that are much higher than Idaho and Washington. The QF Trade Associations do not believe security amounts

²¹ *In re IPUC’s Review of PURPA QF Contract Provisions Including the Surrogate Avoided Resource (SAR) and Integrated Resource Planning (IRP) Methodologies for Calculating Avoided Cost Rates*, IPUC Case No. GNR-E-11-03, Order No. 32697 at 32-33 (Dec. 18, 2012).

²² IPUC Case No. GNR-E-11-03, Order No. 32697 at 33 (“in the event the QF comes on-line as scheduled, then the utility will promptly refund the Security Deposit to the QF’ developer” (quoting approved stipulation)). Even if the QF commits a delay default, the \$45-per-kW security amount may only be retained by the utility to cover actual, proven damages, and it is not automatically forfeited to the utility. IPUC Case No. GNR-E-11-03, Order No. 32697 at 32-33.

²³ IPUC Case No. GNR-E-11-03, Order No. 32697 at 29, 32-33.

²⁴ *In re Puget Sound Energy Tariff Revision*, Washington Utilities and Transportation Commission (“WUTC”) Docket No. UE-190665, Puget Sound Energy Schedule 91, Attachments A, B, and C (Nov. 22, 2019); *in re Avista Tariff Revision*, WUTC Docket No. UE-190663, Avista Standard PPA (Oct. 29, 2020).

²⁵ *In re PacifiCorp Tariff Revision*, WUTC Docket No. UE-190666, Standard PPA, Attachments A and B (Mar. 1, 2021).

need to be required, especially for existing QFs that renew their contracts; however, the numbers proposed by the Joint Utilities are excessive and would unduly burden small QF development in Oregon.

D. 12 x 24 Power Delivery Schedule

The Joint Utilities support inclusion of a requirement that a QF must provide a 12 x 24 power delivery schedule.²⁶ The QF Trade Associations note that seasonal and irrigation hydro QFs will likely not have this information, or if those QFs do provide it, then it will not be useful. Thus, at a minimum, there should not be a requirement for a 12 x 24 power delivery schedule for all QFs. The Joint Utilities briefly discuss proposed rule OAR 860-029-0120(15) regarding incremental upgrades.²⁷ This issue is set to be discussed in Group 2, so the QF Trade Associations reserve the right to respond on this issue in Group 2.

E. Network Upgrade Cost-Allocation Process and Delay of Scheduled COD

The Joint Utilities state the Network Upgrade cost-allocation process “addresses potential costs caused by the QF’s siting decision” and it “certainly should not be used to delay the Scheduled COD beyond three years[.]”²⁸ This is misleading. The Network Upgrade cost-allocation process is not the reason to delay the start of the development period and Scheduled COD. A delay in the development period or Scheduled COD is primarily related to the long periods of time that the utilities take to complete the interconnection study process. The interconnection study process will be particularly long for PacifiCorp now that there is only one yearly interconnection study instead of a serial study process.

²⁶ Joint Utilities’ Initial Comments at 16.

²⁷ Joint Utilities’ Initial Comments at 16.

²⁸ Joint Utilities’ Initial Comments at 17-18.

F. Industry Standard for Development and Construction Period

The Joint Utilities recommend the Commission cap the interval between PPA execution and Scheduled COD at three years without exception and reason a maximum three-year development period is standard industry practice for both QF and non-QF PPAs in Idaho, Washington, Wyoming, and Utah.²⁹ The Joint Utilities cite a standard form PPA approved by the Washington Utilities and Transportation Commission with a three year Scheduled COD requirement, but the Joint Utilities do not cite any requirement for Idaho, Wyoming, and Utah. There are no standard contracts in those states, so it may not be correct that a three-year development period is industry standard in those states. Even if the three-year development period is industry standard in those states, this may be the result of unilateral utility practice rather than the relevant state regulatory commission policy. Thus, it is misleading to look to the practice in Idaho, Wyoming, and Utah as the respective public utility commissions do not approve it.

G. QF's Ability to Terminate a PPA and Pay Damages

The Joint Utilities oppose including in the draft rules the ability of a QF to terminate a standard PPA within six months of execution if the QF received an interconnection study with an uneconomic cost estimate or time estimating to interconnect beyond what the standard PPA allows because the provision is unnecessary.³⁰ The QF Trade Associations support this portion of the Staff draft rule and disagree with the Joint Utilities' substantive position on the ability to terminate a PPA without penalty in this limited circumstance.

²⁹ Joint Utilities' Initial Comments at 19.

³⁰ Joint Utilities' Initial Comments at 23.

The Joint Utilities also state “a QF always has the ability to terminate the PPA and pay damages.”³¹ The QF Trade Associations agree that a QF should have the ability to terminate a contract at any time, subject to appropriate damages or termination provisions (if any). Regardless of the Commission’s decision about the six-month termination provision, the QF Trade Associations request the Commission provide clarification on the ability for a QF to unilaterally terminate its PPA. From the QF Trade Associations’ understanding, at least PGE in the past has taken the position that a QF cannot unilaterally terminate a PPA, but that the utility must agree to the termination. Thus, the Joint Utilities’ position is inconsistent with PGE’s prior positions, and it is warranted for the Commission to affirmatively state that a QF can unilaterally terminate its PPA at any time.

H. Standard QF PPAs Should Not Mirror Non-QF, Market PPAs

The Joint Utilities argue that standard QF PPAs should mirror non-QF, market PPAs by incorporating “market terms and conditions.”³² The QF Trade Associations disagree. As a reminder, these standard PPA contracts apply to projects less than 10 MW and the issue of non-standard PPA contracts is outside of this rulemaking. The question about whether contract provisions for QFs above 10 MWs should, as a general matter, reflect “market terms and conditions” is not before the Commission. The Commission has long recognized the distinction between QFs smaller than 10 MW and projects (QFs and non-QFs) larger than 10 MW. PURPA was enacted, in part, to address the market access challenges faced by small renewable power producers in particular. The QF Trade Associations note that these power producers (with

³¹ Joint Utilities’ Initial Comments at 23.

³² See Joint Utilities’ Initial Comments at 3-13.

projects under 10 MW) continue to include the same types of entities—such as irrigation districts, water districts, and waste management districts—who have developed small QFs since PURPA was enacted.

The Joint Utilities argue that the standard contract PPA terms must be the same as non-QF PPAs in order to achieve customer indifference standard.³³ This is a radical departure from precedent and a novel argument. The Joint Utilities do not cite any support besides the indifference standard in general for this argument or statements such as “[g]iven this customer indifference mandate, states lack authority to implement PURPA in a manner that exposes customers to additional cost, risk, or harm as a consequence of the purchase of QF power when compared to the utility’s alternatives.”³⁴ If the customer indifference standard required or even suggested that a suite of “market terms and conditions” should be used, then one would expect that the utilities could find at least one citation to this principle in 40 years of PURPA implementation.

In addition, the QF Trade Associations note that the Joint Utilities only argue for the small QFs to use certain isolated “market” terms and conditions used in RFPs for larger projects, and actively argue against use by QFs of other fundamental provisions of PPAs that emerge from RFPs for larger projects. For example, the utilities have not argued for the most favorable “market” terms utilized for larger projects in RFPs, such as a 20-to-30-year fixed-price term lengths used for PPAs that emerge from RFPs. Notably, the utilities typically obligate their own customers to even longer fixed cost recovery for utility-owned projects that regularly prevail in

³³ Joint Utilities’ Initial Comments at 3-6.

³⁴ Joint Utilities’ Initial Comments at 4, n.6.

RFPs. In contrast, the utilities have consistently argued in this proceeding against fixed-price terms in excess of 15 years for QFs (even though Oregon statute mandates a 20-year term), and the utilities have even on a number of recent occasions argued for substantially short fixed-price term lengths for QFs.³⁵ The Commission should not accept the Joint Utilities' contradictory and misplaced arguments.

In the proceeding to adopt the utilities' standard contracts, the Commission noted a basic purpose of PURPA "is to provide a market for the electricity produced by small power producers and cogenerators" and "to encourage the economically efficient development of these qualifying facilities (QFs)[.]"³⁶ The Commission Staff argued that "that transaction costs and *other* market barriers, such as the lack of transparency for negotiated QF contract rates, terms and conditions, prevent successful negotiation of a power purchase contract for QFs that are at or under 10 MW."³⁷ The Commission agreed and explained that it was important to "remove transaction

³⁵ See, e.g., *in re Idaho Power Standard Contract Eligibility*, Docket No. UM 1725, Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term at 1 (Apr. 24, 2015) ("Specifically, Idaho Power requests that the Commission: ... and (2) *Reduce the contract term from 20 years to two years for all QF projects above 100 kW*") (emphasis added); *in re PacifiCorp QF Contract Term and Eligibility Cap*, Docket No. UM 1734, PacifiCorp's Application at 1 (May 21, 2015) ("In this petition, the Company specifically asks the Public Utility Commission of Oregon (the Commission) to: 1. Reduce the fixed-price term of QF power purchase agreements (PPAs) *from 15 years to three years*") (emphasis added); *in re Staff's Investigation Relating to Electric Utility Purchases from Qualifying Facilities*, Docket UM 1129, Order No. 05-584 at 17-20 (May 13, 2005) ("PacifiCorp, PGE, Idaho Power and Staff each propose that the maximum standard contract term be fifteen years ... ODOE recommends a maximum term of 20 years ... Two parties argue that the maximum term for standard contract term should be, in many cases, much longer than twenty years.").

³⁶ Docket No. UM 1129, Order No. 05-584 at 1.

³⁷ Docket No. UM 1129, Order No. 05-584 at 14 (emphasis in original).

costs associated with QF contract negotiation, when such costs act as a market barrier to QF development.”³⁸ Further the Commission explained:

The evidence in this proceeding shows that market barriers other than transaction costs pose obstacles to a QF’s negotiation of a power purchase contract. In addition to transaction costs, which in economics and related disciplines are traditionally considered to encompass only those costs that are incurred to make an economic exchange, parties identified other market barriers such as asymmetric information and an unlevel playing field that obstruct the negotiation of non-standard QF contracts. Just like transaction costs, these market barriers can render certain QF projects uneconomic to get off the ground if an individual contract must be negotiated.³⁹

Those same purposes and principles apply in this proceeding, and warrant rejection of the Joint Utilities’ arguments.

The Joint Utilities state “there is nothing in Oregon’s PURPA statute that conflicts with the customer indifference standard or that suggests that it would be appropriate to provide protections for QF developers above and beyond those afforded other market participants.”⁴⁰

The QF Trade Associations disagree as Oregon’s PURPA goals encourage the development of QFs.⁴¹ Thus, the Commission should be making changes that will encourage the development of

³⁸ Docket No. UM 1129, Order No. 05-584 at 16.

³⁹ Docket No. UM 1129, Order No. 05-584 at 16.

⁴⁰ Joint Utilities’ Initial Comments at 5.

⁴¹ See ORS 758.515 (“(2) It is the goal of Oregon to: (a) *Promote the development of a diverse array of permanently sustainable energy resources using the public and private sectors to the highest degree possible*; and (b) Insure that rates for purchases by an electric utility from, and rates for sales to, a qualifying facility shall over the term of a contract be just and reasonable to the electric consumers of the electric utility, the qualifying facility and in the public interest. (3) It is, therefore, the policy of the State of Oregon to: (a) *Increase the marketability of electric energy produced by qualifying facilities located throughout the state for the benefit of Oregon’s citizens; ...*” (emphasis added)).

QFs under PURPA, not hinder development, which the Joint Utilities’ recommendation that the QF contract provisions mirror non-QF contract provisions would do.

The Joint Utilities also argue that the “the predominance of large, sophisticated QF developers demonstrates that it is reasonable to require market terms in QF PPAs.”⁴² However, most QFs under 10 MW, as the Commission has long recognized, are categorically different than large projects that bid into various utility RFPs in the region. Developers of smaller scale renewable energy facilities still require targeted protections because, while the facilities they seek to develop would play an important role in Oregon’s energy future, they do not have the same financial strength as developers of larger QF and non-QF projects and many of them produce power as a secondary outcome of their core business (e.g., operating irrigation infrastructure or a university campus). Their access to market opportunities is ensured by the Commission’s standard contract and the very limited opportunity (at least for small solar developers) to participate in the Community Solar Program. While the Joint Utilities focus solely on recent solar developer interest in selling to PGE under the standard contract, PacifiCorp and Idaho Power have entered into many PPAs with QFs under 10 MW for a variety of other resource types and business models that demonstrate that many small QFs utilizing the standard contract are not large, sophisticated renewable energy developers.⁴³ Thus, the Commission

⁴² Joint Utilities’ Initial Comments at 10.

⁴³ See Attachment A (PacifiCorp Data Response to Renewable Energy Coalition Data Request 5 in OPUC Docket No. LC 77 (PacifiCorp 2021 IRP)); see Attachment B (Idaho Power Data Response to Renewable Energy Coalition Data Request No. 1.1 in OPUC Docket No. LC 74 (Idaho Power 2019 IRP); see also *in re Idaho Power 2019 IRP*, Docket No. LC 74, Renewable Energy Coalition’s Final Comments, Attachment A at 1-6 (Jan. 8, 2021).

should reject the Joint Utilities' recommendation that QF standard contracts mirror non-QF, market contracts.

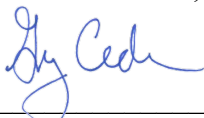
II. CONCLUSION

The QF Trade Associations appreciate the opportunity for further comments and look forward to continued participation in this rulemaking.

Dated this 25th day of March 2022.

Respectfully submitted,

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Attachment A

**PacifiCorp Data Response to Renewable Energy Coalition Data Request 5 in
OPUC Docket No. LC 77 (PacifiCorp 2021 IRP)**

LC 77 / PacifiCorp
February 3, 2022
REC Data Request Set 2 (5)

REC Data Request 5

Please refer to REC Data Request 1.1 and PacifiCorp's Response to REC Data Request 1.1 including Attachment REC 1.1. For each qualifying facility, please indicate the state where the facility is located. Please provide this information in an updated version of Attachment REC 1.1.

Response to REC Data Request 5

The Company continues to object to REC Data Request 1 and now REC Data Request 5 on grounds that it seeks information that is not relevant and the request is not reasonably calculated to lead to information relevant to the discovery of admissible evidence. The 2021 Integrated Resource Plan (IRP) is forward looking, covering the period 2021 through 2040. Qualifying facilities (QF) included in the IRP are existing / executed QF power purchase agreements (PPA). The IRP does not make any assumptions for QF PPAs based on historical information. Subject to and without waiving the foregoing objection and based on the foregoing clarification, the Company responds as follows:

Please refer to the Company's 1st Supplemental response to REC Data Request 1.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

REC Data Request 1										Additional Column
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	
Plant Name	PPA Execution Date	Resource Type	Nameplate Capacity (MW)	Commercial Operation Date (COD)	Original COD	Type of PPA (Standard / Non-standard)	Current PPA Expiration Date	Vintage of PPA	Facility / PPA Status	State
Adams Solar Center, LLC	August 7, 2014	Solar	10.0	July 27, 2018	November 27, 2017	Standard	October 30, 2036	Original	Operating	Oregon
Bear Creek Solar Center, LLC	August 7, 2015	Solar	10.0	September 28, 2018	December 8, 2017	Standard	October 30, 2036	Original	Operating	Oregon
Bell Mountain Hydro LLC (Ted Sorenson)	February 4, 2010	Hydro	0.28	February 4, 2010	December 1, 2009	Standard	August 31, 2029	Original	Operating	Idaho
Bell Mountain Power (Jake Amy)	January 3, 1985	Hydro	0.45	December 1, 1986	January 3, 1985	Standard	December 31, 2021	Original	Operating	Idaho
Bell Mountain Power (Jake Amy)	November 18, 2020	Hydro	0.60	December 1, 1986	January 3, 1985	Standard	December 31, 2022	Amended	Amendment executed	Idaho
Beryl Solar	June 4, 2013	Solar	3.0	August 24, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Big Top LLC (QF)	December 19, 2008	Wind	1.65	August 1, 2009	March 24, 2009	Standard	January 29, 2029	Original	Operating	Oregon
Birch Creek Hydro	August 21, 1984	Hydro	2.65	August 21, 1994	August 21, 1994	Standard	December 31, 2040	Original	Operating	Idaho
Bly Solar Center, LLC	July 24, 2014	Solar	8.5	December 21, 2018	January 24, 2018	Standard	October 30, 2036	Original	Operating	Oregon
Bogus Creek	March 11, 1983	Hydro	0.16	March 11, 1983	March 11, 1983	Unknown	December 31, 1997	Original	PPA Expired	California
Bogus Creek	Amended	Hydro	0.16	Existing	Existing	Unknown	December 31, 2040	Amended	Operating	California
Buckhorn	June 4, 2013	Solar	3.0	December 23, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Bureau of Land Management - Rawlins Office	August 13, 2012	Wind	0.10	March 12, 2013	August 13, 2012	Standard	August 31, 2022	Original	Operating	Wyoming
Butter Creek Power LLC	December 19, 2008	Wind	4.95	August 1, 2009	March 12, 2009	Standard	January 29, 2029	Original	Operating	Oregon
BYU Idaho	January 23, 2015	Natural Gas	5.60	September 30, 2015	August 1, 2015	Standard	July 31, 2017	Original	PPA Expired	Idaho
BYU Idaho	Renewal	Natural Gas	5.60	Existing	Existing	Standard	September 28, 2037	Renewal	Operating	Idaho
C Drop	October 18, 2011	Hydro	1.10	May 3, 2012	March 15, 2012	Standard	May 02, 2032	Original	Operating	Oregon
Captain Jack Solar	June 8, 2020	Solar	2.70	Not COD yet	December 31, 2021	Standard	December 30, 2041	Original	Construction	Oregon
Cargill, Q3 (Kettle Butte Dairy)	February 8, 2011	Biogas	1.70	June 14, 2011	February 26, 2011	Standard	February 28, 2021	Original	PPA Expired	Idaho
CDM Hydro	December 4, 1984	Hydro	6.00	March 1, 1986	December 4, 1984	Standard	March 31, 2021	Original	PPA Expired	Idaho
CDM Hydro	March 29, 2020	Hydro	7.45	Existing	Existing	Standard	March 31, 2041	Renewal	Operating	Idaho
Cedar Valley	June 4, 2013	Solar	3.0	December 7, 2015	September 12, 2015	Standard	July 30, 2035	Original	Operating	Utah
Central Oregon Irrigation District	April 12, 1983	Hydro	6.00	September 1, 1989	September 1, 1989	Standard	December 30, 2020	Original	PPA Expired	Oregon
Central Oregon Irrigation District	Renewal	Hydro	6.00	Existing	Existing	Standard	December 31, 2024	Renewal	Operating	Oregon
Central Oregon Irrigation District - Juniper Ridge	August 17, 2009	Hydro	5.00	October 4, 2010	October 4, 2010	Standard	August 01, 2030	Original	Operating	Oregon
Chiloquin Solar	October 12, 2015	Solar	9.90	January 26, 2018	October 30, 2017	Standard	December 15, 2036	Original	Operating	Oregon
City of Albany, Dept of Public Works	April 4, 2008	Hydro	0.50	January 20, 2009	April 7, 2008	Standard	October 09, 2023	Original	Operating	Oregon
City of Astoria	January 5, 2015	Hydro	0.03	April 8, 2015	February 10, 2015	Standard	December 18, 2029	Original	Operating	Oregon
City of Buffalo	October 26, 1995	Hydro	0.20	August 1, 1997	August 1, 1997	Standard	December 31, 2015	Original	PPA Expired	Wyoming
City of Buffalo	Renewal	Hydro	0.20	Existing	Existing	Standard	December 31, 2021	Renewal	Operating	Wyoming
City of Portland, Portland Hydro Bureau	April 4, 2008	Hydro	0.03	November 1, 2012	December 1, 2011	Standard	February 28, 2027	Original	Operating	Oregon
Commercial Energy Management	November 21, 1991	Hydro	0.90	May 1, 1993	January 1, 1992	Unknown	May 31, 2020	Original	PPA Expired	Idaho
Commercial Energy Management	March 20, 2020	Hydro	0.90	May 1, 1993	January 1, 1992	Unknown	February 28, 2021	Amended	PPA Expired	Idaho
Commercial Energy Management	February 26, 2021	Hydro	0.90	May 1, 1993	January 1, 1992	Unknown	November 30, 2036	Renewal	Operating	Idaho
Consolidated Irrigation Company	September 11, 2015	Hydro	0.48	September 16, 2015	September 16, 2015	Standard	October 26, 2035	Original	Operating	Idaho
Cottonwood Hydro (FKA Alta Energy)	October 23, 2003	Hydro	1.10	January 1, 2005	January 1, 2005	Standard	December 31, 2008	Original	PPA Expired	Utah
Cottonwood Hydro (FKA Alta Energy)	Renewal	Hydro	1.10	Existing	Existing	Standard	December 31, 2009	Renewal	PPA Expired	Utah
Cottonwood Hydro (FKA Alta Energy)	Renewal	Hydro	1.10	Existing	Existing	Standard	December 31, 2011	Renewal	PPA Expired	Utah
Cottonwood Hydro (FKA Alta Energy)	Renewal	Hydro	1.10	Existing	Existing	Standard	December 31, 2025	Renewal	Operating	Utah
Deschutes Valley Hydro District	June 29, 1982	Hydro	4.30	January 1, 1985	November 15, 1982	Unknown	December 31, 2020	Original	PPA Expired	Oregon
Deschutes Valley Hydro District	Renewal	Hydro	4.30	Existing	Existing	Standard	December 31, 2035	Renewal	Operating	Oregon
Dorena Hydro	April 28, 2011	Hydro	6.10	December 11, 2014	December 1, 2012	Standard	November 30, 2032	Original	Operating	Oregon
Draper Irrigation Company	October 14, 2004	Hydro	0.51	October 14, 2004	September 1, 2004	Standard	October 13, 2006	Original	PPA Expired	Utah
Draper Irrigation Company	Renewal	Hydro	0.51	Existing	Existing	Standard	October 13, 2009	Renewal	PPA Expired	Utah
Draper Irrigation Company	Renewal	Hydro	0.51	Existing	Existing	Standard	October 13, 2012	Renewal	PPA Expired	Utah
Draper Irrigation Company	Renewal	Hydro	0.51	Existing	Existing	Standard	February 29, 2032	Renewal	Operating	Utah
Dry Creek	May 2, 1986	Hydro	4.00	April 1, 1987	May 2, 1986	Unknown	April 30, 2022	Original	Operating	Idaho
Dry Creek	April 20, 2021	Hydro	4.00	April 1, 1987	May 2, 1986	Standard	April 30, 2042	Renewal	Renewal executed	Idaho
Eagle Point Irrigation District (Nichols Gap)	September 28, 1983	Hydro	0.72	March 1, 1987	September 28, 1983	Unknown	December 31, 2021	Original	Operating	Oregon
EBD Hydro (Apple)	April 6, 2012	Hydro	2.99	June 11, 2015	April 15, 2013	Standard	April 14, 2028	Original	Operating	Oregon
Elbe Solar Center, LLC	August 7, 2014	Solar	10.0	August 10, 2018	December 5, 2017	Standard	October 30, 2036	Original	Operating	Oregon
Enterprise Solar LLC	June 12, 2014	Solar	80.0	July 29, 2016	October 31, 2016	Non standard	July 21, 2036	Original	Operating	Utah
Escalante Solar I LLC	June 12, 2014	Solar	80.0	August 31, 2016	October 31, 2016	Non standard	August 30, 2036	Original	Operating	Utah
Escalante Solar II LLC	June 12, 2014	Solar	80.0	August 31, 2016	October 31, 2016	Non standard	August 30, 2036	Original	Operating	Utah
Escalante Solar III LLC	June 12, 2014	Solar	80.0	August 31, 2016	October 31, 2016	Non standard	August 30, 2036	Original	Operating	Utah
Farm Power Misty Meadow	March 29, 2012	Biogas	0.75	May 6, 2013	March 29, 2012	Standard	September 30, 2027	Original	Operating	Oregon
Farmers Irrigation	June 29, 1983	Hydro	4.15	June 29, 1987	June 29, 1983	Unknown	December 31, 2010	Original	PPA Expired	Oregon
Farmers Irrigation	Renewal	Hydro	4.15	Existing	Existing	Standard	December 31, 2025	Renewal	Operating	Oregon

Plant Name	PPA Execution Date	Resource Type	Nameplate Capacity (MW)	Commercial Operation Date (COD)	Original COD	Type of PPA (Standard / Non-standard)	Current PPA Expiration Date	Vintage of PPA	Facility / PPA Status	State
Fiddler's Canyon 1	May 29, 2013	Solar	3.0	September 22, 2015	May 30, 2015	Standard	May 29, 2035	Original	Operating	Utah
Fiddler's Canyon 2	May 29, 2013	Solar	3.0	September 22, 2015	May 30, 2015	Standard	May 29, 2035	Original	Operating	Utah
Fiddler's Canyon 3	October 29, 2013	Solar	3.0	December 21, 2015	October 15, 2015	Standard	October 14, 2035	Original	Operating	Utah
Finley Bioenergy	October 24, 2007	Biogas	4.80	December 25, 2007	October 24, 2007	Standard	November 15, 2022	Original	Operating	Oregon
Four Corners Windfarm LLC	June 16, 2009	Wind	10.00	September 11, 2009	September 11, 2009	Standard	June 30, 2029	Original	Operating	Oregon
Four Mile Canyon Windfarm LLC	June 16, 2009	Wind	10.00	September 11, 2009	September 11, 2009	Standard	June 30, 2029	Original	Operating	Oregon
Galesville Dam (Douglas County)	September 1, 1982	Hydro	1.80	February 1, 1987	September 1, 1982	Unknown	December 31, 2021	Original	Operating	Oregon
Georgetown Irrigation	July 2, 1984	Hydro	0.33	December 1, 1985	December 15, 1984	Unknown	March 31, 2021	Original	PPA Expired	Idaho
Georgetown Irrigation	March 30, 2021	Hydro	0.33	December 1, 1985	December 15, 1984	Unknown	March 31, 2022	Amended	Operating	Idaho
Granite Mountain East	April 6, 2015	Solar	80.0	September 21, 2016	October 31, 2016	Non standard	August 11, 2036	Original	Operating	Utah
Granite Mountain West	April 6, 2015	Solar	50.4	September 30, 2016	October 31, 2016	Non standard	September 07, 2036	Original	Operating	Utah
Granite Peak	October 18, 2013	Solar	3.0	August 21, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Greenville	June 4, 2013	Solar	2.2	October 29, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Hill Air Force Base	January 10, 2005	Biogas	2.46	January 10, 2005	January 10, 2005	Standard	January 09, 2025	Original	Operating	Utah
Iron Springs Solar	April 6, 2015	Solar	80.0	August 15, 2016	October 31, 2016	Non standard	August 14, 2036	Original	Operating	Utah
J Bar 9 Ranch	August 15, 2011	Wind	0.10	November 17, 2011	October 31, 2011	Standard	October 31, 2016	Original	PPA Expired	Wyoming
J Bar 9 Ranch	Renewal	Wind	0.10	Existing	Existing	Standard	October 31, 2018	Renewal	PPA Expired	Wyoming
J Bar 9 Ranch	Renewal	Wind	0.10	Existing	Existing	Standard	December 31, 2020	Renewal	PPA Expired	Wyoming
J Bar 9 Ranch	October 12, 2020	Wind	0.10	Existing	Existing	Standard	October 31, 2025	Amended	Operating	Wyoming
Klamath Falls Solar 1 (FKA Ewauna Solar LLC)	August 8, 2014	Solar	0.8	July 12, 2016	September 30, 2015	Standard	September 29, 2035	Original	Operating	Oregon
Klamath Falls Solar 2 (FKA Ewauna Solar 2 LLC)	June 5, 2015	Solar	2.9	December 16, 2017	November 30, 2017	Standard	November 29, 2037	Original	Operating	Oregon
Lacomb Irrigation (CHI)	October 28, 1982	Hydro	0.96	January 1, 1984	January 1, 1984	Unknown	Original	Original	PPA Expired	Oregon
Lacomb Irrigation (Lacomb PPA Renegotiated)	June 19, 1998	Hydro	0.96	July 1, 1987	Existing	Unknown	December 31, 2022	Amended	Operating	Oregon
Laho #1	October 18, 2013	Solar	3.0	July 14, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Lake Siskiyou (Box Canyon)	March 14, 1983	Hydro	5.00	August 1, 1986	March 14, 1983	Unknown	December 31, 2020	Original	Operating	California
Latigo Wind	July 3, 2013	Wind	60.0	March 11, 2016	May 1, 2015	Non standard	April 30, 2035	Original	Operating	Utah
Loyd Fery	June 28, 1985	Hydro	0.04	June 28, 1985	June 28, 1985	Unknown	June 30, 2003	Original	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2004	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2005	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2006	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2007	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2008	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2009	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2010	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2011	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2012	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2013	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2014	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2015	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2016	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2017	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2018	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2019	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2020	Renewal	PPA Expired	Oregon
Loyd Fery	Renewal	Hydro	0.04	Existing	Existing	Standard	June 30, 2024	Renewal	Operating	Oregon
Luckey, Paul	April 27, 1983	Hydro	0.05	January 1, 1987	April 27, 1983	Unknown	December 31, 2018	Original	Shutdown	California
Luckey, Paul	Renewal	Hydro	0.05	Existing	Existing	Non standard	December 31, 2020	Renewal	Shutdown	California
Luckey, Paul	Renewal	Hydro	0.05	Existing	Existing	Non standard	December 31, 2035	Renewal	Operating	California
Mariah Wind	April 1, 2014	Wind	10.0	Terminated	December 1, 2018	Standard	August 31, 2030	Original	Not built/terminated	Oregon
Marsh Valley Hydro & Electric Company	November 21, 1986	Hydro	1.70	November 21, 1986	November 21, 1986	Standard	March 28, 2028	Original	Operating	Idaho
Meadow Creek Project Company - Five Pine	January 4, 2012	Wind	40.00	December 22, 2012	December 22, 2012	Standard	December 30, 2032	Original	Operating	Idaho
Meadow Creek Project Company - North Point	January 4, 2012	Wind	80.00	December 11, 2012	December 11, 2012	Standard	December 30, 2032	Original	Operating	Idaho
Middlefork Irrigation District	June 29, 1983	Hydro	3.70	September 29, 1983	September 29, 1983	Unknown	December 31, 2005	Original	PPA Expired	Oregon
Middlefork Irrigation District	Renewal	Hydro	3.70	Existing	Existing	Standard	December 31, 2006	Renewal	PPA Expired	Oregon
Middlefork Irrigation District	Renewal	Hydro	3.70	Existing	Existing	Standard	December 31, 2021	Renewal	Operating	Oregon
Middlefork Irrigation District	Renewal	Hydro	0.98	Existing	Existing	Standard	December 31, 2021	Renewal	In effect January 1, 2022	Oregon
Milford 2	April 4, 2014	Solar	3.0	December 21, 2015	October 15, 2015	Standard	October 14, 2035	Original	Operating	Utah
Milford Flat	October 18, 2013	Solar	3.0	July 23, 2015	July 31, 2015	Standard	July 30, 2035	Original	Operating	Utah
Mink Creek Hydro	May 21, 1985	Hydro	2.70	December 1, 1986	May 21, 1985	Unknown	March 31, 2022	Original	Operating	Idaho
Mink Creek Hydro	May 25, 2021	Hydro	2.95	December 1, 1986	May 21, 1985	Standard	March 31, 2042	Renewal	Renewal Executed	Idaho
Monroe Hydro (Apple)	April 9, 2012	Hydro	0.3	June 9, 2016	April 1, 2015	Standard	August 31, 2028	Original	Operating	Oregon

Plant Name	PPA Execution Date	Resource Type	Nameplate Capacity (MW)	Commercial Operation Date (COD)	Original COD	Type of PPA (Standard / Non-standard)	Current PPA Expiration Date	Vintage of PPA	Facility / PPA Status	State
Mountain Energy	June 17, 1985	Hydro	0.05	January 1, 1986	June 17, 1985	Unknown	December 31, 2004	Original	PPA Expired	Oregon
Mountain Energy	Renewal	Hydro	0.05	Existing	Existing	Standard	December 31, 2005	Renewal	PPA Expired	Oregon
Mountain Energy	Renewal	Hydro	0.05	Existing	Existing	Standard	December 31, 2006	Renewal	PPA Expired	Oregon
Mountain Energy	Renewal	Hydro	0.05	Existing	Existing	Standard	December 31, 2007	Renewal	PPA Expired	Oregon
Mountain Energy	Renewal	Hydro	0.05	Existing	Existing	Standard	December 31, 2022	Renewal	Operating	Oregon
Mountain Wind 1	July 14, 2006	Wind	60.90	July 2, 2008	July 2, 2008	Non standard	July 01, 2033	Original	Operating	Wyoming
Mountain Wind 2	July 23, 2006	Wind	79.80	September 29, 2008	September 29, 2008	Non standard	September 29, 2033	Original	Operating	Wyoming
Nicholson Sunnybar Ranch	June 27, 1985	Hydro	0.35	April 1, 1986	June 27, 1985	Unknown	April 30, 2021	Original	PPA Expired	Idaho
Sunny Bar Ranch (formerly Nicholson Sunnybar Ranch)	March 29, 2021	Hydro	0.45	Existing	Existing	Standard	April 30, 2041	Renewal	Operating	Idaho
Norwest Energy 2 LLC (Neff)	May 29, 2015	Solar	9.9	December 31, 2016	December 31, 2016	Standard	November 17, 2031	Original	Operating	Oregon
Norwest Energy 4 LLC (Bonanza)	May 29, 2015	Solar	6.0	February 27, 2019	July 31, 2018	Standard	November 17, 2031	Original	Operating	Oregon
Norwest Energy 7 LLC (Eagle Point)	May 29, 2015	Solar	9.9	12/30/2017	September 9, 2017	Standard	November 17, 2031	Original	Operating	Oregon
Norwest Energy 9 LLC (Pendleton)	June 29, 2015	Solar	6.6	11/30/2018	July 31, 2018	Standard	November 17, 2031	Original	Operating	Oregon
O.J. Power Company	March 4, 1986	Hydro	0.26	January 1, 1987	March 4, 1986	Unknown	January 31, 2022	Original	Operating	Idaho
Obsidian Renewables LLC - Black Cap Solar II	July 30, 2014	Solar	8.0	November 30, 2016	December 31, 2016	Standard	November 30, 2036	Original	Operating	Oregon
Obsidian Renewables LLC - Ivory Pine Solar	July 30, 2014	Solar	10.0	Terminated	December 31, 2016	Standard		Original	Not built/terminated	Oregon
Obsidian Renewables LLC - Sprague River Solar	July 30, 2015	Solar	7.0	Terminated	December 31, 2016	Standard		Original	Not built/terminated	Oregon
OR Solar 1 (Sprague River Solar)	June 11, 2015	Solar	10.0	Terminated	November 1, 2016	Standard		Original	Not built/terminated	Oregon
OR Solar 2 (Agate Bay Solar)	June 11, 2015	Solar	10.0	October 22, 2020	October 31, 2017	Standard	October 31, 2036	Original	Operating	Oregon
OR Solar 3 (Turkey Hill Solar)	June 11, 2015	Solar	10.0	December 30, 2017	December 15, 2017	Standard	October 31, 2036	Original	Operating	Oregon
OR Solar 5 (Merrill)	June 17, 2015	Solar	8.0	January 12, 2018	December 15, 2017	Standard	October 31, 2036	Original	Operating	Oregon
OR Solar 6 (Lakeview)	June 17, 2015	Solar	10.0	December 18, 2017	December 15, 2017	Standard	October 31, 2036	Original	Operating	Oregon
OR Solar 8 (Dairy)	June 11, 2015	Solar	10.0	March 14, 2018	December 15, 2017	Standard	October 31, 2036	Original	Operating	Oregon
Orchard Wind Farm 1, LLC	June 30, 2016	Wind	10.0	December 28, 2020	October 1, 2020	Standard	September 30, 2040	Original	Operating	Oregon
Orchard Wind Farm 2, LLC	June 30, 2016	Wind	10.0	December 28, 2020	October 1, 2020	Standard	September 30, 2040	Original	Operating	Oregon
Orchard Wind Farm 3, LLC	June 30, 2016	Wind	10.0	December 28, 2020	October 1, 2020	Standard	September 30, 2040	Original	Operating	Oregon
Orchard Wind Farm 4, LLC	June 30, 2016	Wind	10.0	December 28, 2020	October 1, 2020	Standard	September 30, 2040	Original	Operating	Oregon
Oregon Environmental Industries	August 16, 2006	Biogas	3.20	January 17, 2007	September 7, 2007	Standard	July 31, 2022	Original	Operating	Oregon
Oregon Institute of Technology	April 9, 2010	Geothermal	0.28	April 9, 2010	April 15, 2010	Standard	March 17, 2030	Original	Operating	Oregon
Oregon State University	November 23, 2010	Natural Gas	6.50	November 12, 2010	January 15, 2011	Standard	June 30, 2020	Original	PPA Expired	Oregon
Oregon State University	Renewal	Natural Gas	6.50	Existing	Existing	Standard	March 31, 2022	Original	Operating	Oregon
Oregon Trail Windfarm LLC	December 19, 2008	Wind	9.90	August 1, 2009	March 31, 2009	Standard	January 15, 2029	Original	Operating	Oregon
OSLH - Collier Solar	June 29, 2015	Solar	9.9	February 1, 2017	November 18, 2016	Standard	November 17, 2031	Original	Operating	Oregon
Pacific Canyon Windfarm LLC	December 19, 2008	Wind	8.25	August 1, 2009	March 31, 2009	Standard	January 22, 2029	Original	Operating	Oregon
Pavant Solar	April 11, 2014	Solar	50.0	December 30, 2015	December 31, 2015	Non standard	December 30, 2035	Original	Operating	Utah
Pavant Solar II LLC	March 25, 2015	Solar	50.0	November 22, 2016	December 1, 2016	Non standard	November 30, 2036	Original	Operating	Utah
Pioneer Wind Park I LLC	April 11, 2014	Wind	80.00	October 27, 2016	June 30, 2016	Non standard	October 26, 2036	Original	Operating	Wyoming
Power County Wind Park North	August 18, 2010	Wind	22.50	December 23, 2011	December 23, 2011	Standard	December 22, 2031	Original	Operating	Idaho
Power County Wind Park South	August 18, 2010	Wind	22.50	December 23, 2011	December 23, 2011	Standard	December 22, 2031	Original	Operating	Idaho
Preston City Hydro	February 24, 1982	Hydro	0.40	December 1, 1982	February 24, 1982	Unknown	December 31, 2017	Original	PPA Expired	Idaho
Preston City Hydro	Renewal	Hydro	0.40	Existing	Existing	Standard	December 31, 2032	Original	Operating	Idaho
Quichapa 1	October 29, 2013	Solar	3.0	December 13, 2016	May 30, 2016	Standard	May 29, 2036	Original	Operating	Utah
Quichapa 2	October 29, 2013	Solar	3.0	December 23, 2016	June 30, 2016	Standard	June 29, 2036	Original	Operating	Utah
Quichapa 3	October 29, 2013	Solar	3.0	December 23, 2016	July 29, 2016	Standard	July 28, 2036	Original	Operating	Utah
RES Ag- Oak Lea	November 29, 2009	Biogas	0.17	December 5, 2011	December 5, 2011	Standard	November 30, 2026	Original	Operating	Oregon
Roseburg Forest Products - Weed	November 15, 2010	Biomass	10.00	November 18, 2010	November 18, 2010	Standard	June 30, 2011	Original	PPA Expired	California
Roseburg Forest Products - Weed	Renewal	Biomass	10.00	Existing	Existing	Standard	June 30, 2012	Renewal	PPA Expired	California
Roseburg Forest Products - Weed	Renewal	Biomass	10.00	Existing	Existing	Standard	June 30, 2018	Renewal	PPA Expired	California
Roseburg Forest Products - Weed	Renewal	Biomass	10.00	Existing	Existing	Standard	June 30, 2028	Renewal	Operating	California
Roseburg LFG	February 18, 2011	Biogas	1.60	December 20, 2011	June 20, 2011	Standard	April 30, 2032	Original	Operating	Oregon
Sage Solar I	July 3, 2017	Solar	20.00	September 30, 2019	October 1, 2019	Non standard	September 30, 1939	Original	Operating	Utah/Wyoming
Sage Solar II	July 3, 2017	Solar	20.00	September 13, 2019	October 1, 2019	Non standard	September 30, 1939	Original	Operating	Utah/Wyoming
Sage Solar III	July 3, 2017	Solar	20.00	September 13, 2019	October 1, 2019	Non standard	September 30, 1939	Original	Operating	Utah/Wyoming
Sand Ranch Windfarm LLC	January 19, 2008	Wind	9.90	August 1, 2009	March 31, 2009	Standard	January 15, 2029	Original	Operating	Oregon
Shiloh Ingram Warm Springs Ranch	March 5, 1986	Hydro	0.95	March 14, 1986	March 14, 1986	Unknown	March 31, 2021	Original	PPA Expired	Idaho
Slate Creek	January 1, 1982	Hydro	4.20	January 1, 1985	January 21, 1982	Unknown	December 31, 2018	Original	PPA Expired	California
Slate Creek	January 1, 1982	Hydro	4.20	January 1, 1985	January 21, 1982	Non standard	December 31, 2033	Renewal	Operating	California
South Milford	May 29, 2013	Solar	3.0	April 1, 2015	May 30, 2015	Standard	January 14, 2035	Original	Operating	Utah
Spanish Fork Wind Park 2	June 30, 2006	Wind	18.90	July 31, 2008	July 31, 2008	Non standard	July 31, 2028	Original	Operating	Utah
Sprague Hydro (North Fork Sprague)	September 26, 1980	Hydro	0.75	September 1, 1989	September 28, 1983	Unknown	December 31, 2021	Original	Alternate buyer 1/1/2022	Oregon
St. Anthony	December 20, 2012	Hydro	0.50	October 11, 2014	November 30, 2013	Standard	November 29, 2033	Original	Operating	Idaho

Plant Name	PPA Execution Date	Resource Type	Nameplate Capacity (MW)	Commercial Operation Date (COD)	Original COD	Type of PPA (Standard / Non-standard)	Current PPA Expiration Date	Vintage of PPA	Facility / PPA Status	State
Stahlbush Island Farms	March 19, 2009	Biogas	1.60	June 24, 2009	April 17, 2009	Standard	5/31/2011	Original	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	May 31, 2014	Renewal	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	September 30, 2014	Renewal	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	May 31, 2017	Renewal	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	May 31, 2019	Renewal	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	May 31, 2021	Renewal	PPA Expired	Oregon
Stahlbush Island Farms	Renewal	Biogas	1.60	Existing	Existing	Standard	May 31, 2022	Renewal	Operating	Oregon
Swalley Irrigation District	September 4, 2009	Hydro	0.75	April 23, 2010	November 10, 2009	Standard	January 03, 2030	Original	Operating	Oregon
Sweetwater Solar, LLC	February 23, 2016	Solar	80.00	December 28, 2018	November 1, 2018	Non standard	December 27, 2038	Original	Operating	Wyoming
Tata Chemical (FKA General Chemical)	September 15, 1989	CHP	16.00	September 15, 1989	September 15, 1989	Unknown	December 31, 2013	Original	PPA Expired	Wyoming
Tata Chemical (FKA General Chemical)	Renewal	CHP	32.00	Existing	Existing	Non standard	December 31, 2018	Renewal	PPA Expired	Wyoming
Tata Chemical (FKA General Chemical)	Renewal	CHP	32.00	Existing	Existing	Non standard	December 31, 2038	Renewal	Operating	Wyoming
Thayn Ranch Hydro	April 1, 1992	Hydro	0.48	April 1, 1992	April 1, 1992	Unknown	December 31, 2035	Original	Operating	Utah
Three Peaks Power	August 15, 2015	Solar	80.0	December 9, 2016	October 31, 2016	Non standard	December 14, 2036	Original	Operating	Utah
Three Sisters Irrigation District (Watson Hydro) (200 kW)	May 8, 2018	Hydro	0.20	November 5, 2018	September 1, 2018	Standard	August 31, 2038	Original	Operating	Oregon
Three Sisters Irrigation District (Watson Hydro) (700 kW)	February 18, 2014	Hydro	0.70	August 22, 2014	May 1, 2014	Standard	August 31, 2038	Original	Operating	Oregon
TMF Biofuels	February 16, 2012	Biogas	4.80	December 31, 2012	February 21, 2012	Standard	April 30, 2023	Original	Operating	Oregon
Tooele Army Depot (Wind 1)	May 10, 2016	Wind	1.70	11/7/2016	November 7, 2016	Standard	May 9, 2026	Original	Operating	Utah
Tooele Army Depot (Wind 2)	May 10, 2016	Wind	1.90	11/7/2016	November 7, 2016	Standard	May 9, 2026	Original	Operating	Utah
Tumbleweed Solar, LLC (Saturn Power Corporation)	October 12, 2015	Solar	9.90	12/28/2017	November 6, 2017	Standard	December 15, 2036	Original	Operating	Oregon
Utah Red Hills Renewable Park	September 27, 2013	Solar	80.0	December 16, 2015	January 1, 2017	Non standard	December 30, 2036	Original	Operating	Utah
Wagon Trail LLC	December 19, 2008	Wind	3.30	September 1, 2009	March 31, 2009	Standard	August 31, 2029	Original	Operating	Oregon
Ward Butte Windfarm LLC	December 19, 2008	Wind	6.60	September 1, 2009	March 31, 2009	Standard	August 31, 2029	Original	Operating	Oregon
Weber County, State of Utah	December 16, 2004	Biogas	0.95	July 26, 2008	December 16, 2004	Standard	December 26, 2023	Original	Operating	Utah
Woodline Solar LLC	June 5, 2015	Solar	8.0	December 31, 2017	November 30, 2017	Standard	November 29, 2037	Original	PPA Expired	Oregon
Yakima Tieton (Coviche)	June 12, 1985	Hydro	1.47	June 12, 1985	June 12, 1985	Unknown	December 31, 2005	Original	PPA Expired	Washington
Yakima Tieton (Coviche)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2008	Renewal	PPA Expired	Washington
Yakima Tieton (Coviche)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2011	Renewal	PPA Expired	Washington
Yakima Tieton (Coviche)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2015	Renewal	PPA Expired	Washington
Yakima Tieton (Coviche)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2020	Renewal	PPA Expired	Washington
Yakima Tieton (Coviche)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2030	Renewal	Operating	Washington
Yakima Tieton (Orchards)	June 12, 1985	Hydro	1.47	June 13, 1985	June 12, 1985	Unknown	December 31, 2005	Original	PPA Expired	Washington
Yakima Tieton (Orchards)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2008	Renewal	PPA Expired	Washington
Yakima Tieton (Orchards)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2011	Renewal	PPA Expired	Washington
Yakima Tieton (Orchards)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2020	Renewal	PPA Expired	Washington
Yakima Tieton (Orchards)	Renewal	Hydro	1.47	Existing	Existing	Standard	December 31, 2030	Renewal	Operating	Washington

Attachment B

**Idaho Power Data Response to Renewable Energy Coalition Data Request No.
1.1 in OPUC Docket No. LC 74 (Idaho Power 2019 IRP)**

REC's DATA REQUEST NO. 1.1:

Please provide a complete list of qualifying facility contracts that have entered into PPA with Idaho Power since 1980 including the following information, and please provide all workpapers in original electronic format:

- a. Project Name
- b. Project County and State
- c. PPA execution date
- d. Resource Type
- e. Nameplate Capacity
- f. Actual Commercial Operation Date
- g. Contracted Commercial Operation Date
- h. Type of PPA (Standard or Non-Standard)
- i. PPA Expiration date
- j. Whether the contract is for a new or existing project, and if renewing, then the dates for each contract
- k. For QFs that began operating and whose contracts expired, whether the QF entered into a new contract with Idaho Power, and, if not, why not.

IDAHO POWER COMPANY'S AMENDED RESPONSE TO REC's DATA REQUEST NO. 1.1:

6/24/20 update: The confidential designation of the attachment to DR 1.1 has been removed.

The requested information is provided in the Excel spreadsheet accompanying this response. With regard to subparts (h) and (k) –

- (h) “standard or Non-Standard” type of PPA, this definition of the PPA is specific to PURPA projects in the Oregon jurisdiction, a designation of “N/A” in the Excel spreadsheet indicates an Idaho jurisdictional project.
- (k), to the extent Idaho Power is made aware of a QF's motivation as to why it does not seek a replacement contract, Idaho Power does not document or retain the reason.

LC 74 Attachment - Response to REC DR 1.1

a.	b.	b.	c.	d.	e.	f.	g.	h.	i.	j.	k.
Project Name	County	State	Contract Date	Resource	Nameplate Capacity	Operation Date	Scheduled Operation Date	Standard/Non-Standard	Contract Expiration/Termination Date	New/Replacement	Contract Status
American Falls Solar II, LLC	Power	ID	10/13/2014	Solar	20.00	3/1/2017	12/1/2016	N/A	3/1/2037	New	Online
American Falls Solar, LLC	Power	ID	10/13/2014	Solar	20.00	3/1/2017	12/1/2016	N/A	3/1/2037	New	Online
Arena Drop	Canyon	ID	3/8/2010	Hydro	0.45	9/1/2010	7/15/2010	N/A	9/1/2030	New	Online
B6 Anaerobic Digester 2010	Gooding	ID	5/4/2010	Biomass	2.28	8/1/2010	9/1/2009	N/A	8/1/2020	New	Online
Baker City Hydro	Baker	OR	6/8/2015	Hydro	0.24	9/1/2015	7/1/2015	Standard	9/1/2030	New	Online
Baker Solar Center	Baker	OR	6/21/2017	Solar	15.00	2/18/2020	12/31/2019	Non-Standard	2/18/2040	New	Online
Bannock County Landfill	Bannock	ID	11/13/2013	Biomass	3.20	5/1/2014	5/1/2014	N/A	5/1/2034	New	Online
Barber Dam	Ada	ID	7/13/1987	Hydro	3.70	4/10/1989	1/1/1988	N/A	4/10/2024	New	Online
Bennett Creek Wind Farm	Elmore	ID	12/20/2006	Wind	21.00	12/15/2008	12/31/2007	N/A	12/15/2028	New	Online
Benson Creek Windfarm	Baker	OR	10/9/2013	Wind	10.00	3/23/2017	12/31/2016	Standard	3/23/2037	New	Online
Bettencourt Dry Creek Biofactory	Twin Falls	ID	1/22/2010	Biomass	2.25	5/3/2010	5/1/2010	N/A	12/1/2020	New	Online
Big Sky West Dairy Digester (DF-AI)	Gooding	ID	4/21/2008	Biomass	1.50	1/15/2009	2/14/2009	N/A	1/15/2029	New	Online
Birch Creek	Gooding	ID	7/3/2019	Hydro	0.07	11/1/2019	11/1/2019	N/A	11/1/2039	Replacement	Online
Black Canyon #3	Gooding	ID	1/30/2019	Hydro	0.13	4/1/2019	4/1/2019	N/A	4/1/2039	Replacement	Online
Black Canyon Bliss Hydro	Gooding	ID	8/19/2014	Hydro	0.03	10/8/2015	11/15/2014	N/A	10/8/2035	New	Online
Blind Canyon	Gooding	ID	10/31/2014	Hydro	1.63	12/16/2014	12/15/2014	N/A	12/16/2034	Replacement	Online
Box Canyon	Twin Falls	ID	9/26/2018	Hydro	0.30	2/12/2019	2/12/2019	N/A	2/12/2039	Replacement	Online
Briggs Creek	Twin Falls	ID	6/21/1984	Hydro	0.60	10/10/1985	10/10/1985	N/A	10/10/2020	New	Online
Brush Solar	Baker	OR	10/31/2016	Solar	2.75	12/26/2019	10/1/2019	Standard	12/26/2039	New	Online
Burley Butte Wind Park	Cassia	ID	5/5/2005	Wind	21.30	2/1/2011	9/1/2010	N/A	2/1/2031	New	Online
Bypass	Jerome	ID	11/12/1986	Hydro	9.96	6/18/1988	6/18/1988	N/A	6/18/2023	New	Online
Camp Reed Wind Park	Elmore	ID	7/9/2009	Wind	22.50	12/31/2010	9/30/2010	N/A	12/31/2030	New	Online
Canyon Springs	Twin Falls	ID	8/28/2018	Hydro	0.11	1/1/2019	1/1/2019	N/A	1/1/2039	Replacement	Online
Cassia Wind Farm LLC	Twin Falls	ID	4/7/2006	Wind	10.50	3/24/2009	12/31/2006	N/A	3/24/2029	New	Online
Cedar Draw	Twin Falls	ID	3/14/2019	Hydro	1.55	6/1/2019	6/1/2019	N/A	6/1/2039	Replacement	Online
Clear Springs Trout	Twin Falls	ID	7/6/2018	Hydro	0.56	11/1/2018	11/1/2018	N/A	11/1/2038	Replacement	Online
Cold Springs Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Crystal Springs	Twin Falls	ID	3/31/1984	Hydro	2.44	4/1/1986	4/1/1986	N/A	4/1/2021	New	Online
Curry Cattle Company	Twin Falls	ID	12/15/2017	Hydro	0.25	6/17/2018	6/17/2018	N/A	6/17/2033	Replacement	Online
Desert Meadow Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Dietrich Drop	Jerome	ID	7/13/1987	Hydro	4.50	8/29/1988	5/1/1988	N/A	8/29/2023	New	Online
Durbin Creek Windfarm	Baker	OR	10/9/2013	Wind	10.00	3/23/2017	12/31/2016	Standard	3/23/2037	New	Online
Eightmile Hydro Project	Lemhi	ID	5/5/2014	Hydro	0.36	10/28/2014	8/30/2014	N/A	10/28/2034	New	Online
Elk Creek	Idaho	ID	8/31/1984	Hydro	2.00	5/16/1986	5/16/1986	N/A	5/16/2021	New	Online
Fall River	Fremont	ID	10/28/1991	Hydro	9.10	8/22/1993	8/22/1993	N/A	8/22/2028	New	Online
Fargo Drop Hydroelectric	Canyon	ID	12/1/2011	Hydro	1.27	4/28/2013	4/28/2013	N/A	4/28/2033	New	Online
Faulkner Ranch	Gooding	ID	12/11/1986	Hydro	0.87	8/15/1987	8/15/1987	N/A	8/15/2022	New	Online
Fighting Creek Landfill Gas to Ener.	Kootenai	ID	3/5/2014	Biomass	3.06	4/1/2014	4/1/2014	Standard	4/1/2029	New	Online
Fisheries Dev.	Gooding	ID	6/29/1990	Hydro	0.26	7/3/1990	7/3/1990	N/A	7/3/2040	New	Online
Fossil Gulch Wind	Twin Falls	ID	9/9/2004	Wind	10.50	9/30/2005	1/1/2005	N/A	9/30/2025	New	Online
Geo-Bon #2	Lincoln	ID	3/1/1985	Hydro	0.93	11/15/1986	11/15/1986	N/A	11/15/2021	New	Online
Golden Valley Wind Park	Cassia	ID	5/5/2005	Wind	12.00	2/1/2011	6/1/2006	N/A	2/1/2031	New	Online
Grand View PV Solar Two	Elmore	ID	7/17/2014	Solar	80.00	12/13/2016	9/1/2016	N/A	12/13/2036	New	Online
Grove Solar Center, LLC	Malheur	OR	1/2/2014	Solar	6.00	10/22/2016	12/31/2016	Standard	10/22/2036	New	Online
Hailey Cssp	Blaine	ID	6/14/1985	Hydro	0.06	6/25/1985	6/25/1985	N/A	6/25/2020	New	Online
Hammett Hill Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Hazelton A	Jerome	ID	12/8/2010	Hydro	8.10	3/1/2011	1/1/2011	N/A	2/28/2026	New	Online
Hazelton B	Jerome	ID	12/21/1990	Hydro	7.60	5/8/1993	5/8/1993	N/A	5/8/2028	New	Online
Head of U Canal Project	Jerome	ID	4/23/2014	Hydro	1.28	6/2/2015	5/2/2015	N/A	6/2/2035	New	Online
Hidden Hollow Landfill Gas	Ada	ID	10/11/2005	Biomass	3.20	1/1/2007	3/1/2006	N/A	1/1/2027	New	Online
High Mesa Wind Project	Twin Falls/Elmore	ID	11/16/2011	Wind	40.00	12/27/2012	12/28/2012	N/A	12/27/2032	New	Online
Horseshoe Bend Hydro	Boise	ID	10/28/1991	Hydro	9.50	9/13/1995	9/13/1995	N/A	9/13/2030	New	Online
Horseshoe Bend Wind	Cascade	MT	1/6/2004	Wind	9.00	2/28/2006	12/31/2004	N/A	2/28/2026	New	Online
Hot Springs Wind Farm	Elmore	ID	12/20/2006	Wind	21.00	12/15/2008	12/31/2007	N/A	12/15/2028	New	Online
Hyline Solar Center, LLC	Malheur	OR	1/15/2014	Solar	9.00	11/19/2016	12/31/2016	Standard	11/19/2036	New	Online
ID Solar 1	Ada	ID	7/17/2014	Solar	40.00	8/16/2016	1/16/2016	N/A	1/16/2036	New	Online
Jett Creek Windfarm	Baker	OR	10/9/2013	Wind	10.00	3/23/2017	12/31/2016	Standard	3/23/2037	New	Online
Jim Knight	Gooding	ID	4/1/1985	Hydro	0.34	6/10/1985	6/10/1985	N/A	6/10/2020	New	Online
Koyle Small Hydro	Gooding	ID	1/30/2019	Hydro	1.25	4/1/2019	4/1/2019	N/A	4/1/2039	Replacement	Online
Lateral #10 Hydroelectric	Twin Falls	ID	2/6/2020	Hydro	2.06	5/5/2010	5/5/2020	N/A	5/5/2030	Replacement	Online
Lemoyne	Gooding	ID	4/23/1985	Hydro	0.08	6/23/1985	6/30/1995	N/A	6/22/2020	New	Online
Lime Wind Energy	Baker	OR	12/8/2010	Wind	3.00	12/9/2011	12/31/2011	Standard	12/9/2031	New	Online
Little Wood River Ranch II	Shoshone	ID	4/23/2014	Hydro	1.25	10/9/2015	6/1/2015	N/A	10/9/2035	New	Online
Little Wood Rvr Res	Blaine	ID	10/15/2019	Hydro	2.85	3/1/2020	3/1/2020	N/A	3/1/2040	Replacement	Online
Littlewood / Arkoosh	Lincoln	ID	6/11/1985	Hydro	0.87	8/8/1986	8/8/1986	N/A	8/8/2021	New	Online
Low Line Canal	Twin Falls	ID	11/1/2019	Hydro	8.20	5/1/2020	5/1/2020	N/A	5/1/2040	Replacement	Online
Low Line Midway Hydro	Twin Falls	ID	6/27/2005	Hydro	2.50	8/11/2007	4/1/2007	N/A	8/11/2027	New	Online
Lowline #2	Twin Falls	ID	9/12/1986	Hydro	2.79	4/29/1988	4/29/1988	N/A	4/29/2023	New	Online
Magic Reservoir	Blaine	ID	7/10/1987	Hydro	9.07	6/1/1989	6/1/1989	N/A	6/1/2024	New	Online
Mainline Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Malad River	Gooding	ID	2/19/2019	Hydro	1.17	5/1/2019	5/1/2019	N/A	5/1/2039	Replacement	Online
Marco Ranches	Jerome	ID	2/28/1985	Hydro	1.20	8/1/1985	8/1/1985	N/A	8/1/2020	New	Online
Mile 28	Jerome	ID	8/13/1993	Hydro	1.50	6/1/1994	6/1/1994	N/A	6/1/2029	New	Online
Milner Dam Wind	Cassia	ID	10/14/2005	Wind	19.92	2/1/2011	5/1/2007	N/A	2/1/2031	New	Online
Mitchell Butte	Malheur	OR	5/22/1985	Hydro	2.09	5/18/1989	5/18/1989	Standard	12/13/2034	New	Online
Mora Drop Small Hydroelectric Fac	Ada	ID	4/13/2006	Hydro	1.85	9/15/2006	7/1/2006	N/A	9/15/2026	New	Online
Morgan Solar	Malheur	OR	10/31/2016	Solar	3.00	4/22/2020	10/1/2019	Standard	4/22/2040	New	Online
Mt. Home Solar 1, LLC	Elmore	ID	10/13/2014	Solar	20.00	3/21/2017	12/31/2016	N/A	3/21/2037	New	Online
Mud Creek S and S	Twin Falls	ID	10/5/2016	Hydro	0.52	2/20/2017	2/20/2017	N/A	2/20/2037	Replacement	Online
Mud Creek/White	Twin Falls	ID	4/15/1985	Hydro	0.21	1/10/1986	1/10/1986	N/A	1/10/2021	New	Online
Murphy Flat Power, LLC	Owyhee	ID	10/13/2014	Solar	20.00	4/1/2017	12/1/2016	N/A	4/1/2037	New	Online
North Gooding Main Hydro	Lincoln	ID	7/29/2015	Hydro	1.30	10/8/2016	4/1/2017	N/A	10/8/2036	New	Online
Ontario Solar Center	Malheur	OR	2/26/2018	Solar	3.00	3/29/2020	12/31/2019	Standard	3/29/2040	New	Online
Open Range Solar Center, LLC	Malheur	OR	12/9/2013	Solar	10.00	10/12/2016	12/31/2016	Standard	10/12/2036	New	Online

Orchard Ranch Solar, LLC	Ada	ID	10/13/2014	Solar	20.00	3/1/2017	12/1/2016	N/A	3/1/2037	New	Online
Oregon Trail Wind Park	Twin Falls	ID	2/18/2005	Wind	13.50	1/25/2011	1/15/2006	N/A	1/25/2031	New	Online
Owyhee Dam Cssp	Malheur	OR	4/27/1984	Hydro	5.00	8/10/1985	8/10/1985	Standard	5/9/2034	New	Online
Payne's Ferry Wind Park	Twin Falls	ID	7/9/2009	Wind	21.00	12/31/2010	9/30/2010	N/A	12/31/2030	New	Online
Pigeon Cove	Twin Falls	ID	7/18/2019	Hydro	1.75	11/1/2019	11/1/2019	N/A	11/1/2039	Replacement	Online
Pilgrim Stage Station Wind Park	Twin Falls	ID	2/18/2005	Wind	10.50	1/17/2011	9/1/2010	N/A	1/17/2031	New	Online
Pocatello Solar 1, LLC	Power	ID	10/13/2014	Solar	20.00		12/31/2016	N/A	5/6/2016	New	Online
Pocatello Waste	Bannock	ID	4/24/1985	Biomass	0.46	12/31/1985	12/31/1985	N/A	12/31/2020	New	Online
Pristine Springs #1	Jerome	ID	2/6/2020	Hydro	0.13	5/2/2020	5/2/2020	N/A	5/2/2040	Replacement	Online
Pristine Springs #3	Jerome	ID	2/6/2020	Hydro	0.20	5/2/2020	5/2/2020	N/A	5/2/2040	Replacement	Online
Prospector Windfarm	Baker	OR	10/9/2013	Wind	10.00	3/23/2017	12/31/2016	Standard	3/23/2037	New	Online
Railroad Solar Center, LLC	Malheur	OR	2/21/2014	Solar	4.50	12/6/2016	12/31/2016	Standard	12/6/2036	New	Online
Reynolds Irrigation	Canyon	ID	4/1/1985	Hydro	0.26	5/19/1986	5/19/1986	N/A	5/19/2021	New	Online
Rock Creek #1	Twin Falls	ID	9/25/2017	Hydro	2.17	1/16/2018	1/16/2018	N/A	1/16/2038	Replacement	Online
Rock Creek #2	Twin Falls	ID	7/13/1987	Hydro	1.90	4/2/1989	4/2/1989	N/A	4/2/2024	New	Online
Rock Creek Dairy	Twin Falls	ID	5/24/2010	Biomass	4.00	8/13/2012	5/15/2012	N/A	8/13/2027	New	Online
Rockland Wind Farm	Power	ID	9/3/2010	Wind	80.00	12/9/2011	12/31/2011	N/A	12/9/2036	New	Online
Ryegrass Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Sagebrush	Lincoln	ID	4/1/1985	Hydro	0.43	9/1/1985	9/1/1985	N/A	9/1/2020	New	Online
Sahko Hydro	Twin Falls	ID	11/1/2010	Hydro	0.50	2/17/2011	2/12/2011	N/A	2/17/2021	New	Online
Salmon Falls Wind	Twin Falls	ID	10/14/2005	Wind	22.00	4/22/2011	5/1/2007	N/A	4/22/2031	New	Online
Sawtooth Wind Project	Elmore	ID	9/1/2009	Wind	22.00	11/1/2011	12/31/2012	N/A	11/1/2031	New	Online
Schaffner	Lemhi	ID	12/20/1985	Hydro	0.53	8/8/1986	8/8/1986	N/A	8/8/2021	New	Online
Shingle Creek	Idaho County	ID	5/8/2017	Hydro	0.22	8/1/2017	8/1/2017	N/A	8/1/2022	Replacement	Online
Shoshone #2	Lincoln	ID	7/28/1993	Hydro	0.58	5/1/1996	5/1/1996	N/A	5/1/2031	New	Online
Shoshone CSPP	Lincoln	ID	10/31/2016	Hydro	0.36	2/16/2017	2/16/2017	N/A	2/16/2037	Replacement	Online
Simcoe Solar, LLC	Elmore	ID	10/13/2014	Solar	20.00	3/1/2017	12/1/2016	N/A	3/1/2037	New	Online
Simplot - Pocatello	Power	ID	12/21/2018	CoGen	15.90	3/1/2019	3/1/2019	N/A	3/1/2022	Replacement	Online
SISW LFGE	Cassia	ID	3/13/2017	Biomass	5.00	9/1/2018	10/1/2018	N/A	9/1/2038	New	Online
Snake River Pottery	Gooding	ID	8/23/2019	Hydro	0.09	12/1/2019	12/1/2019	N/A	12/1/2027	Replacement	Online
Snedigar	Twin Falls	ID	9/30/2019	Hydro	0.50	1/1/2020	1/1/2020	N/A	1/1/2040	Replacement	Online
Tamarack CSPP	Adams	ID	3/27/2018	Biomass	6.25	6/1/2018	6/1/2018	N/A	6/1/2038	Replacement	Online
Tasco - Nampa	Canyon	ID	10/2/2003	Thermal	2.00	9/1/2003	9/1/2003	N/A	9/1/2040	New	Online
Tasco - Twin Falls	Twin Falls	ID	11/20/2006	Thermal	3.00	8/11/2001	8/11/2001	N/A	1/19/2040	New	Online
Thousand Springs Wind Park	Twin Falls	ID	2/18/2005	Wind	12.00	1/17/2011	1/15/2006	N/A	1/17/2031	New	Online
Thunderegg Solar Center, LLC	Malheur	OR	2/21/2014	Solar	10.00	11/29/2016	12/31/2016	Standard	11/29/2036	New	Online
Tiber Dam	Liberty County	MT	2/3/2003	Hydro	7.50	6/1/2004	5/15/2004	N/A	6/1/2024	New	Online
Trout-Co	Gooding	ID	1/7/1985	Hydro	0.24	12/1/1986	12/1/1986	N/A	12/1/2021	New	Online
Tuana Gulch Wind Park	Twin Falls	ID	2/18/2005	Wind	10.50	1/25/2011	1/15/2006	N/A	1/25/2031	New	Online
Tuana Springs Expansion	Twin Falls	ID	8/5/2009	Wind	35.70	5/14/2010	6/30/2010	N/A	5/14/2030	New	Online
Tunnel #1	Malheur	OR	5/31/1985	Hydro	7.00	6/8/1993	6/8/1993	Standard	6/8/2036	New	Online
Two Ponds Windfarm	Elmore	ID	11/12/2010	Wind	23.00	12/8/2012	12/31/2012	N/A	12/8/2032	New	Online
Vale Air Solar Center, LLC	Malheur	OR	12/9/2013	Solar	10.00	11/9/2016	12/31/2016	Standard	11/9/2036	New	Online
Vale I Solar	Malheur	OR	10/31/2016	Solar	3.00		10/1/2019	Standard		New	Online
White Water Ranch	Gooding	ID	2/24/1984	Hydro	0.16	8/1/1985	8/1/1985	N/A	8/1/2020	New	Online
Willow Spring Windfarm	Baker	OR	5/23/2014	Wind	10.00	3/23/2017	12/31/2016	Standard	3/23/2037	New	Online
Wilson Lake Hydro	Jerome	ID	12/21/1990	Hydro	8.40	5/18/1993	5/18/1993	N/A	5/18/2028	New	Online
Yahoo Creek Wind Park	Twin Falls	ID	7/9/2009	Wind	21.00	12/31/2010	9/30/2010	N/A	12/31/2030	New	Online