

July 9, 2021

**Re: *In the Matter of Public Utility Commission of Oregon General Capacity Investigation, Docket No. UM 2011 – Idaho Power Company’s Comments on Staff’s ELCC Straw Proposal***

Idaho Power Company (Idaho Power or the Company) submits the following comments responding to Staff’s straw proposal for Effective Load Carrying Capability (“ELCC”) modeling standards (hereinafter, the “Straw Proposal”), which was filed on June 8, 2021. The Company appreciates Staff’s efforts crafting the Straw Proposal and the opportunity to submit comments. Although Staff requested redline edits to its Straw Proposal, Idaho Power is concerned that the conceptual framework underlying the Straw Proposal requires significant alteration and additional discussion before specific edits can be proposed. To that end, the Company provides these general comments and recommends further discussions.

Idaho Power’s primary concern is that Staff’s proposal is overly burdensome and therefore unworkable. ELCC calculations are data intensive and require considerable modeling time to complete. The Straw Proposal would require Idaho Power to calculate annual ELCC values for a wide range of potential resource types and include the ELCC values in an appendix to its Integrated Resource Plan (“IRP”). Depending on the number of resource types—which could be voluminous based on the workshop discussions—it could take Idaho Power several months of dedicated modeling to compute the ELCC values for the IRP appendix. For perspective, a typical IRP modeling cycle takes several months to complete, meaning that ELCC modeling as detailed in the Straw Proposal could easily double the IRP preparation period. A workable methodology must be flexible enough to reflect the different and changing circumstances of individual utilities and not so burdensome that it would prolong existing IRP cycles. The Company cannot support imposing overly prescriptive and burdensome ELCC modeling requirements as envisioned by the Straw Proposal.

In addition, the Company is concerned that the prescriptive modeling assumptions set forth in Section 2(f) and (g) would create unreliable ELCC results. For example, under section 2(g) of the Straw Proposal, the ELCC calculations would exclude resource additions unless they are “contractually committed,” while under Section 2(f), the utility would assume resource retirements based on “best estimates.” In order for the ELCC calculations to provide meaningful results, however, the calculations must account for all of the resources included in the IRP’s preferred portfolio, particularly if the ELCC calculation is going to consider the full 20-year IRP planning horizon. This means that the calculations must assume both resource additions and retirements based on the “best estimate” as set forth in the IRP’s preferred portfolio.

Finally, the Company believes that synthetic or modeled data should only be used when actual data is not available. The Company agrees that eight years of data is a reasonable goal but should not be a requirement because most variable energy resources are new; eight years of data may be difficult to obtain. And if eight years (an arbitrary number) cannot be achieved, the Company strongly believes that a lesser amount of actual data (for example, four years) is preferable and should be prioritized over synthetic data.

Once again, Idaho Power appreciates Staff’s effort to craft the Straw Proposal and is eager to develop a proposal that is workable and agreeable to all parties. The Company’s primary concern is the modeling burden associated with the Straw Proposal—an issue that would be best resolved through more discussion.

Respectfully submitted,



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