

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 84

In the Matter of

IDAHO POWER COMPANY,

2023 Integrated Resource Plan.

Renewable Northwest's  
Comments on Staff Report

**I. INTRODUCTION**

Renewable Northwest (“RNW”) thanks the Oregon Public Utility Commission (the “OPUC” or the “Commission”) and OPUC Staff (“Staff”) for this opportunity to comment on Staff’s Report for the Special Public Meeting regarding Idaho Power company’s (“Idaho Power” or “the company”) 2023 Integrated Resource Plan (“IRP”). In its report, Staff recommends that the Commission acknowledge Idaho Power’s 2023 IRP, approve Staff’s expectations for the 2025 IRP, and approve Staff’s recommendation to grant Idaho Power a waiver of its obligation to file a 2023 IRP Update. RNW broadly supports these recommendations and provides brief comments on each proposed course of action.

**II. COMMENTS**

**1. RNW Supports Acknowledgment of Idaho Power’s 2023 IRP**

In our opening comments, we expressed our support for Idaho Power’s IRP which resulted in the selection of large amounts of low-cost renewable resources and storage. Even with the delay of the Boardman to Hemingway (“B2H”) transmission line, Idaho Power’s next least-cost preferred portfolio includes 1,800 MW of wind, 2,825 MW of solar, 908 MW of 4-hr batteries, 150 MW of 8-hr batteries, 200 MW of 100-hr batteries, over 500 MW of demand-side resources, and 841 MW of coal exits across the twenty-year planning horizon. The preferred portfolio makes clear that even without a clean electricity mandate, renewables and storage are the foundation of a least-cost, least- risk portfolio.

RNW continues to support the majority of Staff’s recommendations, including:

- **Staff Recommendation 2** - Acknowledge action item 6: if economic, acquire up to 1,425 MW of combined wind and solar in 2026-2028.

- **Staff Recommendation 3** - Acknowledge action item 8: bring the first phase of Gateway West (GWW) online by end-of-year 2028.
- **Staff Recommendation 5** - Acknowledge action item 1: continue exploring potential participation in the Southwest Intertie Project (SWIP)-North project in 2023-2024.
- **Staff Recommendation 7** - Acknowledge action item 2: explore a 5 MW long-duration storage pilot project between 2024 and 2028.
- **Staff Recommendation 8** - Acknowledge action item 7: include 14 MW of capacity associated with Western Resource Adequacy Program (WRAP) in 2027.
- **Staff Recommendation 9** - Prior to portfolio optimization for the next IRP, the company must work with Staff and Stakeholders to determine and employ a non-zero renewal rate for all QFs in line with PacifiCorp's estimation methodology, or other similar methodologies, to be adopted in the 2025 IRP.
- **Staff Recommendation 10** - Idaho Power should assume a 75 percent wind QF renewal rate pending a non-zero renewal rate determination via a methodology accepted by the Commission in the next IRP.

The acknowledgement of the action items above will allow Idaho Power to continue exploring and pursuing a variety of actions that will support the procurement and integration of renewable energy, capture the benefits of diverse resources across the West, and facilitate learning about emerging technology. The final two recommendations will result in a more reasonable renewal rate for QF projects that supply Idaho Power.

Turning to coal-to-gas conversions, RNW appreciates Staff's more in-depth explanation of their support for the Valmy conversions in Staff's final report. It is clear that with the delay of B2H, the cost gap between the portfolios with and without the Valmy conversions grows. This cost differential highlights the importance and urgency of building new transmission to integrate low cost renewable and storage resources. While RNW refrains from weighing in on the acknowledgement of the Valmy conversions here, we focus the remainder of our comments on Staff's expectations for the 2025 IRP.

RNW also continues to request that the company provide any available updates on the following topics at the July 23, 2024 Special Public Meeting:

- The status of B2H and its expected online date; and
- The impact on Idaho Power's planning of PacifiCorp's announcement that it plans to install carbon capture and sequestration (CCS) technology on Bridger Units 3 and 4.

## **2. RNW Supports Staff's Expectations for the 2025 IRP**

Staff provides expectations for the next IRP cycle as a “starting point for future discussions amid rapidly changing conditions.”<sup>1</sup> RNW supports all of Staff’s expectations, with specific attention to expectations 1-7 based on our prior engagement in this docket. We will avoid repeating our support for each expectation but will reiterate two things we hope to see in Idaho Power’s next plan.

First, RNW continues to believe that there is value in modeling a scenario where the company exits all coal by 2030, without participating in CCS installation at Bridger 3 and 4 and without participating in the conversion of Valmy 1 and 2. The company asserts that modeling this scenario is meaningless because, “[B]y the time the 2025 IRP is under review, the Valmy 1 and 2 conversions will be well underway, with construction activities beginning in the fall of 2025 and construction expenditures (such as engineering and materials costs) occurring well before the fall of 2025.”<sup>2</sup> However, the Valmy conversions will not yet be underway as the company *develops* the 2025 plan. Consequential resource decisions are often tested over multiple IRP cycles to continue validating the prudence of a potential investment. The scale and pace of change within the energy sector only reinforces the need to conduct such testing. Even if this scenario is ultimately not selected as the preferred portfolio, it can still provide the company, the Commission, Staff, and interested parties with meaningful insights about the emissions and cost impacts of coal exits.

Second, a robust evaluation of the options available for Bridger Units 3 and 4 is necessary, even if PacifiCorp has announced their intention to install CCS. Idaho Power should not make resource decisions solely based on the plans of another company. It would be helpful to see an analysis of the costs, benefits, and risks associated with installing CCS, converting to gas, or exiting the units altogether.

## **3. RNW Supports Granting Idaho Power a Waiver for the 2023 IRP Update**

RNW supports Staff’s recommendation to grant Idaho Power’s waiver request for the 2023 IRP Update. Staff explains that the company plans to file the 2025 IRP before the IRP Update would otherwise be due, rendering the Update moot. RNW has already received communications from the company about the IRP Advisory Committee, which will support the development of the 2025 plan through monthly meetings from August 2024 to May 2025.

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<sup>1</sup> Staff Final Report, LC 84, p. 44

<sup>2</sup> Idaho Power Company’s Final Reply Comments, LC 84, p.6

### III. CONCLUSION

RNW thanks Staff for their thorough evaluation of Idaho Power's 2023 IRP and for the recommendations and expectations detailed in Staff's final report. We look forward to continued engagement in this docket through the Special Public Meetings on July 23rd and 30th.

Respectfully submitted this 19th day of July, 2024,

/s/ Katie Chamberlain

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