

VIA ELECTRONIC FILING

August 28, 2023

Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97301

RE: UM 2143 — Idaho Power’s Comments Regarding the Investigation into Resource Adequacy in the State – Staff’s Updated Draft Rules Proposal

Attention: Filing Center,

Idaho Power Company (“Idaho Power” or “Company”) appreciates the opportunity to provide comments to the Public Utility Commission of Oregon (“Commission”) on Staff’s [Updated Draft Resource Adequacy Rules Proposal](#) in Docket No. UM 2143 – Investigation into Resource Adequacy in the State. On August 11, 2023, Staff filed its final draft rules proposal in response to stakeholder comments filed on July 21, 2023. The substantive language changes proposed in Staff’s updated rules seek to clarify the definition of resource adequacy (“RA”), the intent and parameters of filing requirements, and the reports in which compliance information must be filed.

Idaho Power greatly appreciates Staff’s continued engagement with stakeholders and is encouraged by the productive discussions Staff facilitated throughout this docket. RA is at the cornerstone of Idaho Power’s ability to provide customers with reliable electric service amidst an evolving energy landscape. As such, the Company puts considerable thought and consideration into its RA strategy, both for the near-term and the long-term. As the industry transitions to more variable energy resources (“VER”), Idaho Power believes RA is best approached from a regional perspective, where entities can capture the diversity benefit of VER generation across different geographical areas. Participation in the Western Resource Adequacy Program (“WRAP”) grants access to this type of regional diversity and, subsequently, grants access to additional capacity during times of greatest need.¹ Therefore, Idaho Power considers participation in WRAP to be a vital part of its RA strategy.²

¹ IPC-E-23-08, IPC DIRECT N. BLACKWELL, p. 4.

² *Id.*, p. 3.

Idaho Power is grateful for Staff’s acknowledgement of WRAP participation as an effective strategy for the specific RA needs of Oregon.³ Further, the Company sees Staff’s proposed informational filing for WRAP-participating electric companies⁴ as a reasonable way to connect regional RA efforts to RA within the state. As the Company identified in its prior comments, Staff’s initial proposal included informational filing requirements that would be disconnected from the company-specific analysis provided in the Integrated Resource Plan (“IRP”). Staff’s prior draft language also did not address the issue of confidentiality. However, Staff provided language clarifying that confidential forward-looking information must only “...be made available to Qualified Parties upon request pursuant to a Modified Protected Order”.⁵ Additionally, Staff explained that the informational filing is intended to provide a high-level view of the Company’s WRAP participation and how it interacts with the overall resource strategy – not how it directly connects to the specific modeling and analysis within the Company’s IRP.⁶

Given Staff’s clarifying language regarding confidentiality and the high-level intent of informational filing requirements, Idaho Power has no lingering questions regarding Staff’s proposal and its inclusion in the Company’s IRP as a chapter or an appendix. The Company reiterates the crucial nature of WRAP to the enhanced RA across the region and, therefore, does not object to a state RA program, so long as it does not attempt to duplicate or work at cross purposes with WRAP. Staff’s efforts to ensure clarity of intent and language, as well as its effort to avoid redundancy with WRAP, are apparent and greatly appreciated by Idaho Power.

Sincerely,



Abby Johnson
Regulatory Policy and Strategy Analyst
Idaho Power
cc: OPUC Filing Center

³ February 17, 2023. Staff’s Updated Straw Proposal. p. 2., “...the updated straw proposal is structured to incentivize regional RA program participation while still laying the groundwork for a workable state RA program...”, “Align with regional program metrics, and incentivize regional participation.”

⁴ Staff’s Updated Draft Rules Proposal, p. 4.

⁵ *Id.*

⁶ *Id.*, “The Electric Company’s Informational Filing must be included as a chapter to the Integrated Resource Plan that incorporates the Advisory Forecast from a Qualified Regional Program and contains a discussion about how the overall resource strategy interacts with Resource Adequacy concerns.”, “A description of any notable deviations between the load forecast, Qualified Capacity Contributions, or Planning Reserve Margin contained in a Qualified Regional Program’s Advisory Forecast and what is used in the Electric Company’s Integrated Resource Plan analysis and associated action plan.”