

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2317

In the Matter of

IDAHO POWER COMPANY,

Application for Approval of 2028 All-Source  
Request for Proposals To Meet 2028 Capacity  
Resource Need.

COMMENTS OF RENEWABLE  
NORTHWEST

**June 3, 2024**

**COMMENTS**

Renewable Northwest (“RNW”) is grateful to the Oregon Public Utility Commission (“Commission”) for the opportunity to submit these comments regarding Idaho Power’s 2028 All-Source Request for Proposals (“RFP”). As we have observed in comments in a related docket, LC 84 regarding Idaho Power’s 2023 Integrated Resource Plan (“IRP”), this RFP is a reflection of Idaho Power’s significant near-term need for new clean resources.<sup>1</sup> To that end, we also reiterate our IRP comments on one other point: we recommend that the Commission bear in mind as this docket proceeds that procurement above 1,425 MW between the Company’s 2026 and 2028 All-Source RFPs may well be in the best interest of the Company’s customers.

We are also pleased to report that RNW’s membership has identified very few issues with the company’s 2028 RFP. We submit these comments to address only two recommendations: first, that the company endeavor to align its timing for firm bid pricing with the federal government’s decision-making process on possible solar module tariffs; and second, that the company reduce penalties for Energy Resource Interconnection Service (“ERIS”) resources to support creative and flexible approaches to interconnection in an increasingly transmission-constrained environment.

On the first point, the industry is expecting further action from the federal government on solar module tariffs. An April 17, 2024 report from Reuters indicated that the government plans to eliminate a tariff exemption for certain bifacial solar panels, but that “[n]o decision has been made on the timeline of the expected reversal.”<sup>2</sup> Given that Idaho Power’s preferred portfolio includes substantial solar additions in the leadup to 2028 -- resources that align with this RFP -- RNW recommends that the company work to align its timing for firm bid pricing and shortlist

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<sup>1</sup> Renewable Northwest’s Comments on Staff’s Recommendations, Docket No. LC 84 (May 23, 2024).

<sup>2</sup> Nicola Groom & Jarrett Renshaw, Reuters, “Exclusive: U.S. Plans To Restore Tariff on Dominant Solar Technology” (Apr. 17, 2024), *available at* <https://www.reuters.com/world/us/us-plans-restore-tariffs-dominant-solar-technology-sources-say-2024-04-17/>.

development with the federal government's decision-making timeline to ensure accurate bid pricing. While it may be impossible to create that schedule alignment based on information available today, a commitment by the company to track the tariff proceeding and update the schedule if needed would help to ensure that the bids it assesses at the time of shortlist formation are based on the best available economic information.

On the second point, as discussed in the IE's recent filing in this docket, Idaho Power's RFP bid scoring penalizes ERIS resources by 5% relative to Network Resource Interconnection Service ("NRIS") resources. RNW's understanding is that ERIS resources -- whose interconnection service is curtailable under conditions of severe system stress -- may help relieve near-term pressure on the region's congested transmission system while still helping Idaho Power meet its needs. In other words, while NRIS is a higher-quality interconnection product than ERIS, ERIS resources nevertheless stand to offer significant value to Idaho Power. And, similar to the conversation that has been playing out at the Commission in recent years regarding conditional firm transmission service, offering more credit to ERIS resources may help the region to get more out of its increasingly constrained transmission system. To that end, RNW recommends that Idaho Power reduce its proposed 5% penalty and encourages the company and the Commission to explore how ERIS interconnection might be a tool to support near-term clean resource acquisition in a time of growing transmission constraints.

RNW once again appreciates the company's and the Commission's attention to these comments, which we think will help ensure the company identifies a least-cost, least-risk shortlist of bids to meet its 2028 needs. We look forward to further engagement in this docket.

Respectfully submitted this 3rd day of June, 2023,

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