



COLE ALBEE
Main (503) 595-3922
cole@mrg-law.com

June 10, 2024

VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket No. 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.

Attention Filing Center:

Attached for filing in the above-referenced docket, please find Idaho Power Company's Reply Comments.

Please contact this office with any questions.

Sincerely,

Cole Albee
Paralegal
McDowell Rackner Gibson PC

**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

**IDAHO POWER COMPANY’S REPLY
COMMENTS**

I. INTRODUCTION

In accordance with the schedule filed by Staff on May 13, 2024, Idaho Power Company (“Idaho Power” or “Company”) hereby submits these comments responding to the comments submitted by London Economics International (“LEI,” the Independent Evaluator (“IE”)) on May 28, 2024, and the comments submitted by Staff, the Northwest and Intermountain Power Producers Coalition (“NIPPC”) and Renewable Northwest (“RNW”) on June 3, 2024, addressing the Company’s draft 2028 All-Source Request for Proposals (“2028 AS RFP” or “RFP”).

Idaho Power appreciates the robust stakeholder feedback and is engaged in ongoing discussions with Staff and LEI and will work with NIPPC and RNW to address their comments and suggestions. The Company anticipates resolving most issues and modifying the 2028 AS RFP document as necessary.

II. DISCUSSION

A. Revised Process for post-2028 Bids.

Idaho Power has an urgent need for additional resources to meet its 2028 peak energy and capacity needs and that 2028 need is driving this RFP. However, the Company has ongoing resource needs beyond 2028, which can potentially increase significantly with the addition of one or more new large loads. Given the Company’s ongoing resource needs, the length of time required to conduct a rule-compliant RFP, and the long lead times needed to develop certain types of dispatchable generation resources, the Company proposed to allow bids in this 2028 AS

1 RFP for resources or market purchases deliverable after 2028. In response to this proposal,
2 parties expressed concerns regarding how the Company would evaluate post-2028 bids relative
3 to those capable of meeting the 2028 resource need.

4 To address these concerns and the related recommendations made by the parties, the
5 Company has developed a new proposal for bifurcating the bidding process for 2028 bids and
6 post-2028 bids. The proposed RFP Exhibit R – Supplemental 2029 and Later Requirements
7 details the purpose, proposal specifications, and bid evaluation criteria and processes for bids
8 that cannot meet the requirements of the RFP related to delivery prior to summer 2028. These
9 “2029 and Later Bid(s)” will be subject to all aspects of the RFP except for the details specifically
10 outlined in Exhibit R, including a separate bid submission timeline and evaluation process. By
11 utilizing a single RFP with two distinct bidding windows for 2028 bids and 2029 and Later Bids,
12 the Company can efficiently solicit resources to meet both the urgent 2028 need and the longer-
13 term resource need and ensure that all bids are evaluated in a fair and consistent manner.

14 While Exhibit R was designed to directly respond to party recommendations, the Company
15 acknowledges that it introduces a new process into this RFP that was not contemplated when the
16 original schedule was adopted. However, given the urgent need for 2028 resources and the
17 significant time already required for approval of the RFP for 2028 resources, introduction of the
18 new Exhibit R should not otherwise delay approval and issuance of the RFP for 2028 bids.

19 **B. Response to LEI**

20 LEI provided five recommendations in its Independent Evaluator Report dated May 28,
21 2024, regarding items that Idaho Power should respond to in its comments. The
22 recommendations are addressed below.

23 Resource Preference

24 LEI suggests that the RFP more clearly state how Idaho Power would reflect its
25 “preference” in the processing of projects coming online in 2028 versus projects with in-service
26 dates beyond 2028. The new Exhibit R – Supplemental 2029 and Later Bid Requirements to the

1 RFP differentiates projects that can meet the April 1, 2028, commercial operation date (“COD”)
2 from those that cannot, the 2029 and Later Bid(s).

3 Those projects that cannot meet the 2028 COD requirement will have a different eligibility
4 that does not require the bidding resource to be in the generator interconnection queue (“GI
5 Queue”) as of the date of the bid submission. The COD of June 1, 2028, or later provides time
6 for projects to request interconnection and go through the interconnection study process after the
7 bid submission deadline. The new Exhibit R addresses the differences and any other specific
8 items related to the need for 2029 and Later Bids. As such, all bids meeting the criteria
9 established in the RFP that can meet the 2028 COD will be evaluated relative to each other and
10 the identified 2028 energy and capacity need. Those that cannot meet the criteria in the RFP for
11 2028, but can meet the requirements established in Exhibit R, will be evaluated separately and
12 only relative to bids that meet the June 1, 2028, or later COD.

13 Permitting

14 LEI recommends creating separate questions under the permitting process to better
15 assess the level of local controversy generated by each project; this could include assessment of
16 consultation with the community. Idaho Power will clarify that information identified by bidder or
17 Idaho Power’s own knowledge of risks associated with local permitting will be reviewed
18 accordingly. Staff has also suggested some specific statements for incorporation. Idaho Power
19 has revised Bid Eligibility factor No. 8 to address public and community outreach and clarify that
20 Idaho Power may utilize its discretion and local knowledge to assess the risk associated with local
21 outreach and the likelihood of a projects’ feasibility.

22 Contract Normalization

23 LEI, as well as Staff, suggested the final RFP provide a few clarifying sentences on the
24 utilization of Exhibit O in contract normalization. Exhibit O – Levelized PVRR Scenario has been
25 updated to clarify its use as follows: “Exhibit O provides example annual revenue requirements
26 for resources of varying time periods and how the annual revenue requirement drives the Present

1 Value of the Revenue Requirement, the levelized payment, and levelized cost of capacity or
2 energy as would be utilized in the evaluation process.”

3 Requirement for Securing Generator Interconnection Agreement (“GIA”)

4 LEI commented that the requirement for proof of GIA or GIA application might negatively
5 impact the consideration of projects with in-service date beyond 2028. To address this concern
6 Idaho Power has included Exhibit R – Supplemental 2029 and Later Requirements as described
7 above to differentiate projects that can meet the April 1, 2028, COD and projects that can meet a
8 later COD. While Idaho Power prefers proof of generator interconnection status and the ability to
9 deliver, the requirement to have applied to the generation interconnection queue is removed in
10 Exhibit R.

11 Sensitivity

12 LEI proposes that the Company conduct a sensitivity analysis around the
13 commercialization timing of the Gateway West (“GWW”) transmission projects. The timing of the
14 GWW project, as indicated in the 2023 Integrated Resource Plan (“IRP”), is assumed to be no
15 earlier than late 2028, which would not impact resource analysis for the 2028 resources
16 contemplated by the 2028 AS RFP, which is prioritizing projects with CODs prior to summer of
17 2028. For resources from 2029 and Later Bids, Idaho Power will include an additional scenario
18 that includes a delayed GWW commercialization date of 2032.

19 **C. Response to Staff**

20 Staff provided ten recommendations in its Staff Opening Comments on Scoring and
21 Modeling Methodology and Draft RFP filed on June 3, 2024, regarding items that Idaho Power
22 should respond to in its comments, including that Idaho Power respond to all IE
23 recommendations. Staff’s remaining recommendations are addressed below.

1 Initial screening of projects

2 Staff recommends that the Company propose and reflect changes in the initial screening
3 that will allow projects with CODs beyond 2028 to remain eligible. As noted above, the Company
4 has developed Exhibit R to address projects with CODs beyond June 1, 2028.

5 Development schedule guidance

6 Staff suggests that Idaho Power should clarify the guidelines it provides bidders for
7 development schedules. If Idaho Power does not have such guidelines, Staff suggests
8 development schedules include the following details:

- 9 ○ Development timeline.
10 ○ Dates of major milestones.
11 ○ Description of project risks, including discussion of their influence on the project's
12 critical path and mitigation strategies.

13 The Company has updated Bid Eligibility factor No. 7 and Resource Based Non-Pricing
14 factor No. 9 to clarify the expectation that development schedules include timeline, major
15 milestones, risks, and mitigation strategies.

16 Assumptions in the pricing model

17 Staff proposes that the Company state the changes made to the assumptions in the price
18 model, allowing stakeholders to provide feedback on these changes, ensuring they are consistent
19 with industry best practices and reflective of the best available information.

20 The Idaho Power evaluation team will keep all major assumptions as consistent as
21 possible with the 2023 IRP. However, there are some assumptions that warrant updates. For
22 example, the evaluation team will use the Weighted Average Cost of Capital ("WACC") approved
23 in the Company's most recent Idaho general rate case, which was effective January 1, 2024, as
24 the discount rate. The 6.62 percent discount rate, which is lower than the 7.12 percent WACC
25 used in the 2023 IRP, and associated debt and equity return components will be used to develop
26 revenue requirement. In addition, the evaluation team will update the production tax credit

1 (“PTC”) assumption when the federal government releases the inflation adjusted PTC for the
2 current year, which is anticipated in early summer 2024. Depending on the final outcome of the
3 2026/2027 RFP, the Company may need to investigate the potential for selling tax credits
4 resulting from the 2028 RFP. The evaluation team will be reviewing relevant market information
5 to develop a reasonable estimate for tax credit sale discounts. Recent industry articles suggest
6 investment tax credits (“ITC”) are selling in the 90 cents to 95 cents range with PTCs closer to 95
7 cents to 96 cents. Relevant market information utilized may include publicly available market
8 reports, articles, or discussions with industry experts.

9 Evaluation of bids with CODs beyond 2028

10 Please see the Company’s response to the related IE recommendation above. As noted
11 above, the Company has developed Exhibit R to address 2029 and Later Bids.

12 RFP Resource Volumes

13 Staff states that the 2028 RFP should specify the resource volume it plans to fill with the
14 2028 COD bids and that any changes to this volume that occur during the RFP process should
15 be published both to this docket and to bidders, along with supporting rationale. As noted in the
16 RFP, the 2023 IRP identifies 138 megawatts (“MW”) of incremental peak capacity needs in 2028
17 and 555 MW of supply-side resource additions in the Preferred Portfolio in 2028, but that the
18 Company’s capacity need is subject to change based on updated information regarding load and
19 resources, as well as contracts backing firm transmission. The 2023 IRP also identifies 142 MW
20 of incremental capacity needs in 2029, growing to a total of over 1,150 MW by 2038. Further,
21 within the last few years, the number of unique large industrial load inquiries has increased, with
22 many large load inquiries totaling hundreds and thousands of megawatts, which if the loads
23 materialized, would further increase projected total demand. The Company will publish updated
24 resource needs if changes to annual capacity positions have been identified prior to approval by
25 the Commission of the final short list.

1 Risk of Opposition to Siting

2 Staff would like Idaho Power to propose a strategy for reflecting the risk of community
3 opposition to renewable energy siting in its analysis of a project’s ability to attain necessary
4 permits. As mentioned in Section B, Idaho Power has revised Bid Eligibility factor No. 8 to address
5 public and community outreach and clarify that Idaho Power may utilize its discretion and local
6 knowledge to assess the risk associated with local outreach and the likelihood of a projects’
7 feasibility.

8 Variables Subject to Stochastic Analysis and Related Assumptions

9 Staff asks the Company to clarify the variables subject to stochastic analysis as well as
10 the assumptions used in this analysis. The stochastic variables and assumptions used in the
11 2028 AS RFP analysis will be those used in the 2023 IRP. For more information on the stochastic
12 variables/assumptions used in the 2023 IRP please see the 2023 IRP—Appendix C.

13 Delays in Boardman to Hemingway (“B2H”) Transmission Line

14 Staff recommends that Idaho Power explain how it believes the current delay in
15 construction of B2H, and possible further delays past 2028, could impact the selection of projects
16 or ultimate performance of the final short list, including an explanation of any contingency plans.
17 Idaho Power does not believe the projected online date of B2H will affect the 2028 project
18 analysis, as the projected online date is prior to April 1, 2028. If, however, during the evaluation
19 of any bids from the 2028 AS RFP, the projected B2H online date is delayed, Idaho Power will
20 work with Staff, LEI, and stakeholders to develop an additional relevant scenario for the bid
21 evaluations.

22 Present Value Revenue Requirement (“PVRR”) Calculation

23 Staff suggests that Idaho Power should provide a brief explanation of PVRR calculations.

24 The present value of the revenue requirement calculation starts with forecasting the
25 annual revenue requirement for each year of a project’s expected life. For a Company-owned
26 asset, the revenue requirement would include depreciation expense, taxes, insurance, operations

1 and maintenance expense, interest expense, and equity return. For Power Purchase Agreements
2 or Battery Supply Agreements, the annual revenue requirement mirrors the annual estimated
3 accounting expense for a project over the term of the contract, plus the revenue requirement
4 associated with any network upgrades driven by the project that Idaho Power will eventually own.
5 Next, the annual stream of revenue requirements is discounted at Idaho Power's WACC to arrive
6 at the Present Value of the Revenue Requirement. Please also see the Company's response to
7 LEI's suggestions related to Exhibit O.

8 **D. Response to NIPPC and RNW**

9 Scoring Utility-Owned Resources:

10 NIPPC proposes that the Commission should provide further guidance regarding certain
11 costs included in the price scoring of Utility-Owned Resources, based on Staff recommendations
12 in a recent RFP docket. The Company believes that it has made reasonable costs assumptions
13 for utility-owned resources bids, consistent with the approach used in the last RFP. Moreover,
14 NIPPC's specific recommendation to impose contingency cost adders for utility-owned resources
15 lacks support and should not be adopted here.

16 Interconnection and COD Limitations:

17 NIPPC provided comments suggesting that Idaho Power relax the requirement that bids
18 be supported by an active interconnection queue position because that restriction would result in
19 a very limited bid pool under the unique circumstances of this RFP. NIPPC proposes two related
20 modifications to the Draft RFP's treatment of preferred COD and interconnection status: first, the
21 RFP's treatment of post-April 1, 2028, CODs should be clarified and second, the interconnection
22 requirements should be relaxed. The Company believes that its proposed modifications
23 adequately address the post-April 1, 2028, concerns addressed by NIPPC with the inclusion of
24 Exhibit R as described above.

1 ERIS Interconnection:

2 Both NIPPC and RNW recommend changes to the treatment of facilities using energy
3 resource interconnection service (“ERIS”) and recommend that Idaho Power take additional steps
4 to facilitate use of ERIS interconnection. NIPPC recommends two specific changes to the IRP to
5 facilitate use of ERIS. RNW recommends that Idaho Power reduce the proposed 5 percent
6 penalty applied to bids using ERIS.

7 First, interconnecting with ERIS increases the risk that additional, and potentially
8 significant, network upgrade costs will be identified when Idaho Power submits a transmission
9 service request and seeks to designate the resource as a Designated Network Resource. Having
10 firm transmission service available to designate the resource as a Network Resource is critical to
11 ensuring that the resource is available to reliably serve load in a variety of system conditions.
12 Because these potential costs will not be known when bid evaluation is taking place, the modest
13 scoring reduction for ERIS interconnection appropriately reflects this risk to ensure that all bids
14 are comparably evaluated based on the potential network upgrade costs required.

15 Second, the Company believes that the modest scoring adjustment applied to ERIS bids
16 is reasonable. The penalty equates to 1.25 points of the possible 100 points that a bid can earn
17 in the scoring and modeling methodology.

18 Existing Facilities:

19 NIPPC believes that the RFP should provide more clarity and opportunity for existing
20 resources to bid. Idaho Power clarifies that for 2028 resources, an existing facility that is under
21 contract to sell its electrical output to Idaho Power under a term that ends prior to April 1, 2028,
22 is eligible to bid into the RFP for a power sale term commencing after termination of its existing
23 contract. The requirement that existing resources that submit bids not be currently contracted
24 with Idaho Power beyond April 1, 2028, is intended to ensure that a resource provides incremental
25 capacity in 2028. If Idaho Power were to accept bids from projects that are already contracted
26 with Idaho Power for deliveries beyond April 2028, those projects would not provide incremental

1 capacity in 2028, it would simply be a renegotiation of existing contract terms and conditions.
2 With respect to projects that expire later in 2028 – i.e., after summer, they would not provide
3 incremental capacity in summer of 2028 but could be eligible to provide incremental capacity in a
4 later year and could bid in pursuant to Exhibit R. A similar approach would be applied to bids for
5 2029 and beyond.

6 Uncertain Solar and Storage Tariffs:

7 Both NIPPC and RNW commented on the impact of uncertain solar and storage tariffs
8 and how changes to the tariffs should be addressed in the RFP process. RNW noted a report
9 that the government plans to eliminate a tariff exemption for certain bifacial solar panels and
10 recommends that the Company align its timing for firm bid pricing and shortlist development with
11 the federal government’s decision-making timeline. Similarly, NIPPC suggests that Idaho Power
12 should provide further clarity regarding how it will address significant changes in tariffs after bids
13 are submitted.

14 The Company agrees that the tariff issue is significant and is tracking its progress. Idaho
15 Power’s interests are in ensuring this 2028 AS RFP results in bids for resources that can meet
16 the 2028 capacity needs and that are based on the best information available at this time. Should
17 any changes be made to solar and storage tariffs, the Company will do its best within the timeline
18 contemplated by the RFP to incorporate any necessary changes.

19 Tax Benefits Modeling:

20 NIPPC commented on the modeling of tax benefits for utility-owned resources. They
21 noted that due to recent changes in tax law and varying circumstances, the tax benefit
22 assumptions used in the price scoring model lacked transparency.

23 Depending on the final outcome of the 2026/2027 RFP, the Company may need to
24 investigate the potential for selling tax credits resulting from the 2028 RFP. The evaluation team
25 will be reviewing relevant market information to develop a reasonable estimate for tax credit sale
26 discounts. Recent industry articles suggest ITCs are selling in the 90 cents to 95 cents range

1 with PTCs closer to 95 cents to 96 cents. Relevant market information utilized may include
2 publicly available market reports, articles, or discussions with industry experts.

3 Form Contracts:

4 NIPPC recommends certain revisions to the Draft RFP's form contracts. Many of the items
5 identified by NIPPC go to the substantive nature of the provisions themselves, which Idaho Power
6 believes are not appropriately debated at this point in the process but are items that would be
7 discussed and negotiated between the parties during contract negotiations. The substantive
8 nature of a bidder's redlines is not a gating item that would exclude a bidder from the process,
9 but rather an opportunity for the bidders to identify important contract terms and conditions or
10 assumptions they are attaching to their bids. Regardless of what bidders submit as initial redlines
11 with their bids, it is the Company's experience that once the final short list is selected, the
12 comprehensive nature of the ensuing negotiations runs somewhat independent of the more
13 general initially submitted redlines. Idaho Power remains open to considering proposals on
14 specific contract provisions from bidders in the course of negotiations. The most appropriate
15 avenue to do so is in the negotiations with bidders for their specific projects, as different bidders
16 may have different negotiation priorities. Additionally, all Idaho Power's executed agreements
17 must be individually filed and approved as part of a public proceeding at the Idaho Public Utilities
18 Commission. Idaho Power expects that the negotiated terms and conditions will align around a
19 relatively tight band of reasonable industry standard terms and conditions that are widely known
20 and accepted by developers of projects and potential bidders.

21 Idaho Power has supplied draft agreements to cover differing ownership and structures
22 that are geared toward solar and battery resources and the combination thereof, primarily
23 because those are the only currently available documents that the Company has used in
24 contracting in its other recent procurements. Idaho Power will make efforts to develop a wind
25 specific template or a more general terms and conditions document for the provision of identified
26 redlines and/or important contracting terms and conditions as part of a bid submittal. With regard

1 to market purchases, Idaho Power has proposed utilizing the WSPP standard agreement or a
2 mutually agreeable alternative master agreement. These purchases would also have certain
3 terms and conditions reflecting the specific details of the transaction in a confirmation of such
4 purchase utilizing the standard master agreement.

5 **III. CONCLUSION**

6 Idaho Power appreciates the robust stakeholder feedback from LEI, Staff, NIPPC, and
7 RNW, and has modified the RFP in response to that feedback. Because of the limited timeframe
8 to provide these reply comments, the Company is still evaluating certain elements of that
9 feedback and will continue to work collaboratively with the IE and Staff to provide explanations of
10 various subjects and make additional modifications to the RFP leading up to the next steps in the
11 competitive bidding process. The Company anticipates resolving most issues raised by the
12 participants as discussed in these comments.

Respectfully submitted this 10th day of June 2024.

McDOWELL RACKNER GIBSON PC



Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th Ave., Suite 400
Portland, OR 97205
Email: adam@mrg-law.com

Donovan E. Walker
Lead Counsel
1221 West Idaho Street
P.O. Box 70
Boise, Idaho 83707
Email: DWalker@Idahopower.com

Attorneys for Idaho Power Company

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Idaho Power Company's 2028 All-Source Request for Proposal

June 10, 2024

DRAFT 2028

All-Source Request for Proposals (RFP)

for peak capacity & energy resources



Zycus Event: XXXXXXXXX
Draft RFP Posted: XXXXX
RFP Issued: XXXXX
RFP Response Due: XXXXXX

Idaho Power Company
P.O. Box 70
Boise, ID 83707

Table of Contents

- 1. *Disclaimer* _____ 1
- 2. *Purpose* _____ 3
 - 2.1. BACKGROUND _____ 3
 - 2.2. THE SOLICITATION _____ 3
 - 2.3. REGULATORY CONTEXT _____ 4
 - 2.4. IPC SELF-BUILD RESOURCES AND BENCHMARK RESOURCES _____ 4
 - 2.5. INDEPENDENT EVALUATOR _____ 5
 - 2.6. CONFIDENTIALITY _____ 6
 - 2.7. SOLICITATION PORTAL AND RESTRICTION ON COMMUNICATIONS _____ 6
 - 2.8. SCHEDULE _____ 7
- 3. *Proposal Specifications* _____ 8
 - 3.1. ELIGIBLE PROPOSALS _____ 8
 - 3.2. ALTERNATIVE PROPOSALS _____ 11
 - 3.3. TRANSMISSION ALTERNATIVES _____ 12
- 4. *Resource Based Proposals: Additional Specifications and Instructions* _____ 12
 - 4.1. MINIMUM REQUIREMENTS _____ 12
 - 4.2. DELIVERY AND RESOURCE STATUS _____ 12
 - 4.3. OWNERSHIP AND AGREEMENT TYPES _____ 12
 - 4.4. INTERCONNECTION STUDIES AND COST ESTIMATING _____ 13
 - 4.5. BID SUBMISSION PROCESS _____ 15
 - i Bid Definition Form and Selectable Portfolio _____ 15
 - ii Bid Entry Form _____ 16
 - iii Hourly Renewable Production Template _____ 16
 - iv Bid Submittal _____ 16
 - 4.6. EVALUATION FEES _____ 16
 - 4.7. EXCEPTIONS TO THE DRAFT FORM AGREEMENTS _____ 17
 - 4.8. EXCEPTIONS TO THE TECHNICAL SPECIFICATIONS _____ 18
 - 4.9. EXCEPTIONS TO THE DRAFT FORM LETTER OF CREDIT _____ 18

- 5. *Market Purchase Proposals: Additional Specifications and Instructions* _____ 19
 - 5.1. MINIMUM REQUIREMENTS _____ 19
 - 5.2. AGREEMENT TYPES _____ 19
 - 5.3. BID ATTRIBUTES _____ 19
 - 5.4. BID SUBMISSION PROCESS _____ 19
 - i Bid Definition Form _____ 19
 - ii Bid Entry Form _____ 20
 - iii Bid Submittal _____ 20
- 6. *Additional Requirements for All Bid Packages* _____ 20
 - 6.1. CONTENTS OF WRITTEN BID PROPOSAL _____ 20
 - 6.2. BID NAMING _____ 20
 - 6.3. BID WRITTEN DOCUMENTS _____ 20
 - 6.4. RFP EXHIBITS _____ 21
 - 6.5. FIRM BID _____ 21
 - 6.6. TAXES _____ 21
 - 6.7. DATA AND CYBER SECURITY _____ 21
 - 6.8. PURCHASING RESTRICTIONS/PROHIBITED TECHNOLOGY _____ 22
 - 6.9. SMALL BUSINESS AND SMALL DISADVANTAGED BUSINESS PROGRAM _____ 22
 - 6.10. INSURANCE _____ 23
 - 6.11. FINANCIAL AND CREDIT INFORMATION _____ 23
 - 6.12. CLARIFICATION OF BIDS _____ 23
 - 6.13. ADDENDA TO RFP _____ 23
- 7. *Bid Evaluation, Negotiation and Approval* _____ 23
 - 7.1. THE EVALUATION PROCESS _____ 23
 - 7.2. PHASE 1 – INITIAL SHORTLIST _____ 24
 - 7.3. PHASE 2 – FINAL SHORTLIST _____ 27
 - 7.4. ADDITIONAL RIGHTS _____ 29
 - 7.5. ACCEPTANCE AND REJECTION OF BIDS _____ 29
 - 7.6. AGREEMENT NEGOTIATIONS _____ 29
 - 7.7. EXCLUSIVITY _____ 30

7.8. PUBLICITY _____ 30

7.9. COMMISSION APPROVAL _____ 30

8. ENTIRE RFP _____ 30

EXHIBIT A – Bid Definition Form

EXHIBIT B – Bid Entry Form

EXHIBIT C – Bid Eligibility Checklist

EXHIBIT D – Non-Price Scoring Matrix

EXHIBIT E – Proposed Market Purchase Volumes

EXHIBIT F – Draft Form Agreements for Resource Based Proposals

EXHIBIT G – BESS Technical Specifications

EXHIBIT H – Solar Technical Specifications

EXHIBIT I – Wind Technical Specifications

EXHIBIT J – Gas-Fired Convertible to Hydrogen Specifications

EXHIBIT K – Mutual Non-Disclosure Agreement

EXHIBIT L – Counterparty Financial Questionnaire

EXHIBIT M – Draft Form Letter of Credit

Exhibit N – Bid Format and Requirements

Exhibit O – Levelized PVRR Scenarios

Exhibit P – Benchmark Bids

Exhibit Q - Hourly Renewable Production Template

[Exhibit R – Supplemental 2029 and Later Bid Requirements](#)

1. Disclaimer

The information contained in this Request for Proposals (RFP) is presented to assist interested parties in deciding whether or not to submit a bid. Idaho Power Company (IPC), an operating company subsidiary of IDACORP, Inc., is issuing this RFP to solicit formal bids from qualified companies (each a Bidder) and does not represent this information to be comprehensive or to contain all of the information that a Bidder may need to consider in order to submit a bid. None of IPC, its affiliates, or their respective employees, directors, officers, customers, agents, and consultants makes—or will be deemed to have made—any current or future representation, promise, or warranty—express or implied—as to the accuracy, reliability, or completeness of the information contained herein, or in any document or information made available to a Bidder—whether or not the aforementioned parties knew or should have known of any errors or omissions, or were responsible for their inclusion in, or omission from, this RFP.

No part of this RFP and no part of any subsequent correspondence by IPC, its affiliates, or their respective employees, directors, officers, customers, agents, or consultants shall be taken as providing legal, financial, or other advice, or as establishing a contract or contractual obligation. IPC reserves the right to request from Bidders information that is not explicitly detailed in this document, obtain clarification from Bidders concerning bids, conduct contract development discussions with selected Bidders, conduct discussions with members of the Evaluation Team and other support resources as described in this RFP. The requirements specified in this RFP reflect those presently known. IPC reserves the right to vary, in detail, the requirements and/or to issue addenda to the RFP. In the event it becomes necessary to revise any part of the RFP, addenda will be provided to Bidders included in the current and applicable stage of the RFP.

IPC will, in its sole discretion and without limitation, evaluate bids and proceed in the manner IPC deems appropriate. IPC reserves the right to reject any and all, or portions of any bid submitted by Bidders for failure to meet any criteria set forth in this RFP or otherwise, and to accept bids other than the lowest cost bid.

This RFP has been prepared solely to solicit bids and is not a contract offer. This RFP is not binding on IPC. The only document that will be binding on IPC is an agreement duly executed by IPC and the successful Bidder (if any) after the completion of the evaluation process and the award and negotiation of an agreement. IPC reserves the right to reject any and all bids submitted by Bidders. The issuance of this RFP does not obligate IPC to purchase any product or services offered by Bidder or any other entity. Furthermore, IPC may choose, at its sole discretion, to abandon the RFP process in its entirety. Bidders agree that they submit bids without recourse against IPC, IDACORP Inc., any of IDACORP Inc.'s affiliates, or any of their respective employees, agents, officers, or directors for failure to accept an offer for any reason. IPC also may decline to enter into any agreement with any Bidder, terminate negotiations with any Bidder, or abandon the RFP process in its entirety at any time, for any reason, and without notice thereof. Bidders that submit bids agree to do so without legal recourse against IPC, its affiliates or their respective employees, directors, officers, customers, agents or consultants for rejection of their bids or for failure to execute an agreement for any reason. IPC and its affiliates shall not be liable to any Bidder or other party in law or equity for any reason whatsoever for any acts or omissions arising out of or in connection with this RFP. Bidder shall conform in all material respects to all applicable laws, ordinances, rules, and regulations and nothing in this RFP shall be construed to require IPC or Bidder to act in a manner contrary to law. Except as otherwise provided in the rules and orders of the Idaho Public Utilities Commission (IPUC) and the Public Utility Commission of Oregon (the OPUC), (jointly the Commissions), by submitting its bid, a Bidder waives any right to challenge any evaluation by IPC of its bid.

Bidder whose bid may be selected in response to this RFP acknowledges that it assumes full legal responsibility for the accuracy, validity, and legality of the work provided in conformance with this RFP. By submitting its bid, a Bidder waives any right to challenge any determination of IPC to select or reject its bid. IPC reserves the right to accept the bid in whole or in part, and to award to more than one Bidder. Furthermore, Bidder understands that any “award” by IPC does not obligate IPC in any way. IPC will not be obligated to any part unless and until IPC executes a definitive agreement between the parties.

Bidder will absorb all costs incurred in responding to this RFP, including without limitation, costs related to the preparation and presentation of its response. All materials submitted by the Bidder immediately become the property of IPC. Any exception will require written agreement by both parties prior to the time of submission.

In responding to this RFP, Bidder shall adhere to best business and ethical practices. Bidder shall adhere to IPC’s [Supplier Code of Conduct](#), also available at idahopower.com.

Bidder is specifically notified that failure to comply with any part of this RFP may result in disqualification of the bid, at IPC’s sole discretion.

This RFP, in its entirety, is draft and subject to final approval by the OPUC. Idaho Power will notify potential bidders and incorporate any updates as applicable upon approval by the OPUC. OPUC Case No. UM 2317.

2. Purpose

2.1. BACKGROUND

IDACORP, Inc. is a holding company formed in 1998. Comprised of regulated and non-regulated businesses, its origins lie with Idaho Power Company (IPC), a regulated electric utility that began operations in 1916. Today, IPC is the largest regulated electric utility in the state of Idaho and IDACORP's chief subsidiary. IPC serves over 630,000 residential, business, agricultural and industrial customers. The company's service area covers approximately 24,000 square miles, including portions of eastern Oregon. Learn more about IPC at idahopower.com.

IPC currently serves its customers by supplying low-cost, reliable, and clean energy. Affordable, clean hydropower is the largest source of energy for customers. Power generation comes from a diverse set of resources that continues to meet a growing demand. For a more detailed description of current generation resources, please visit: idahopower.com/energy-environment/energy/energy-sources/.

IPC's service territory continues to experience customer growth and an increasing peak demand (load) for electricity. IPC anticipates sustained load growth that will require the procurement of new resources to meet peak summer demand and maintain system reliability as identified in the most recent [2023 Integrated Resource Plan](#) (IRP). The addition of new resources to meet peak demand is critical to ensure IPC can continue to reliably meet the growing demands on its electrical system and serve its customers.

2.2. THE SOLICITATION

IPC is issuing this RFP to solicit formal bids from Bidders for two types of electric energy and capacity products. The first type is unit-contingent energy where capacity is delivered from specific electric resources (Resource Based Proposals). The second type is firm energy (WSPP Schedule C or equivalent preferred) that meets the eligibility requirements of the Western Resource Adequacy Program (WRAP) in terms of resource specificity, transmission, and other requirements (Market Purchase Proposals). The eligible types of bids are described further in [Section 3](#) of this RFP and include Resource Based Proposals including asset purchases, power purchase agreements, and battery storage agreements with exclusive ownership by IPC of any and all environmental attributes associated with all energy generated and Market Purchase proposals, including firm energy contracts. Details on the bid submission process and the bid evaluation process are also described further in this RFP.

IPC's annual capacity position developed to inform its *2023 IRP* demonstrates that the Company will have future resource needs. The *2023 IRP* identifies 138 megawatts (MW) of incremental peak capacity needs [in 2028](#)-and 555 MW of supply-side resource additions in the Preferred Portfolio in 2028. Further, the *2023 IRP* identifies the Gateway West 500 kilovolt (kV) transmission line segment construction in late 2028, which is predicated on future resource locations driving the need for additional transmission. The capacity need [identified](#) is subject to change based on updated information regarding load and resources, as well as contracts backing firm transmission.

IPC will be accepting bids for energy or capacity incremental to its system beginning in the summer 2028 timeframe and beyond from Resource Based Proposals and Market Purchase Proposals. While IPC is focused on meeting needs in 2028, IPC is interested in receiving proposals beyond 2028 as well and will review over the

course of the evaluation process based on the most up to date information. [Requirements for bids that would achieve a commercial operation after 2028 are found in Exhibit R – Supplemental 2029 and Later Bid Requirements.](#)

IPC holds (or expects to hold) transmission rights on various paths that could be used for delivery of resources to support bids. These rights are listed in EXHIBIT E – Proposed Market Purchase Volumes. As part of any bid submitted, a Bidder must indicate whether or not the bid is contingent on delivery of energy across transmission rights controlled by IPC.

Evaluation of bids will be performed by a team of IPC staff and retained consultants with relevant subject matter expertise (Evaluation Team) and be reviewed by an independent evaluator (IE) as described in [Section 2.5.](#)

The process of issuing and responding to this RFP, evaluation and selection of bids, and the negotiation and approval of the agreement(s), is known as the Solicitation. Bidders who are interested in participating in the Solicitation and submitting a bid must first register via the third-party solicitation portal, Zycus, further described in [Section 2.7](#) of this RFP. This RFP sets forth the terms and conditions by which IPC will perform the Solicitation. Bidder agrees to be bound by all the terms, conditions, and other provisions of this RFP and any addenda to it that may be issued by IPC. This RFP governs the Solicitation and supersedes any other written or oral form of communication between Bidders and IPC concerning the Solicitation.

2.3. REGULATORY CONTEXT

Execution of any agreement will ultimately be subject to approval by the Commissions.

For the IPUC, this could include, but is not limited to, approval of a certificate of public convenience and necessity (CPCN) application from IPC. IPC reserves the right to: 1) inform the IPUC that IPC could not reach agreement with the Bidder of a selected resource; 2) request IPUC approval of any agreements it enters into with successful Bidders (e.g., CPCN applications); and 3) terminate any agreement if IPC fails to receive IPUC approval of submitted agreements or applications. Bidder shall provide any and all information and documentation reasonably requested by IPC to support such applications and requests.

The OPUC has issued rules on competitive bidding for resource acquisitions, where a company seeks to acquire resources or contracts with a duration greater than five years and a quantity greater than 80 MW. This RFP is subject to those rules as further described in the [Oregon Competitive Bidding Rules.](#)

2.4. IPC SELF-BUILD RESOURCES AND BENCHMARK RESOURCES

In addition to bids from Bidders, a separate team of IPC staff and retained consultants (Internal Bid Team) may submit Resource Based Proposal(s) in response to this RFP (Benchmark Bid). The Evaluation Team will treat the Internal Bid Team as a Bidder. The Evaluation Team will subject any Benchmark Bid from the Internal Bid Team to the same requirements, evaluation methodology, and other standards specified in this RFP for a bid from a third-party Bidder. Furthermore, the Evaluation Team and the Internal Bid Team must comply with an IPC Standards of Conduct Protocol (Separation of Function) to ensure the Evaluation Team functions independently from the Internal Bid Team, does not provide access to any non-public information or undue preference to the Internal Bid Team, and provides the Internal Bid Team and Bidders equal access to non-public information related to the competitive bidding process for new generation resource procurement.

A Benchmark Bid may include a bid for a self-build project to be owned by IPC and will be subject to the requirements described in this RFP. A Benchmark Bid may also include partnership arrangements or agreements between the Internal Bid Team and third parties that may collaborate to submit a joint Benchmark Bid. Exhibit P – Benchmark Bids describes the three bids anticipated to be submitted by the Internal Bid Team as well as the availability of associated utility assets that can be made available to each of the third-party Bidders.

IPC's Benchmark Bids will be submitted to the IE no later than seven (7) days prior to the opening of bids from the market (Third-Party Bids). Third-Party Bids shall not be opened until the IE and IPC's Evaluation Team have reviewed, evaluated, validated, and scored any and all Benchmark Bids. The Benchmark Bid scores will be assigned using the same scoring and evaluation criteria that will be used to score Third-Party Bids.

IPC is also making available to all Bidders the transmission rights defined in EXHIBIT E – Proposed Market Purchase Volumes and requests Market Purchase Proposals that utilize these IPC transmission rights.

2.5. INDEPENDENT EVALUATOR

The OPUC appointed London Economics International, LLC as the independent, third-party IE for the Solicitation. The IE will help ensure the Solicitation is conducted transparently in accordance with OPUC Competitive Bidding Rules and that all bids are evaluated consistently and impartially. The IE will report to the OPUC. The general role and responsibilities of the IE are outlined as follows:

- The IE will review the initial draft RFP and Scoring and Modeling Methodology (SMM) developed by IPC and filed with the OPUC and consult with IPC on changes to the draft RFP and SMM.
- The IE will participate in workshops concerning the filed draft RFP and SMM, and review filings by OPUC Staff and others concerning the RFP.
- The IE will also review stakeholder comments, provide feedback, and suggest modifications to the draft RFP prior to IPC's filing of the final RFP with the OPUC.
- Prior to receipt of Benchmark Bids and Third-Party Bids, the IE will review the assumptions to be used by IPC in its quantitative evaluation of the bids, including those for its AURORA capacity expansion and production cost simulation.
- The IE will prepare and submit to the OPUC an assessment of the draft RFP (IE Draft RFP Assessment Report) and the final RFP (IE RFP Assessment Report) in conjunction with IPC's filing of the RFP with the OPUC for approval. The IE Draft RFP Assessment Report and IE RFP Assessment Report shall review the adequacy, accuracy, and completeness of all solicitation materials to ensure compliance with the OPUC competitive bidding requirements and consistency with accepted industry standards and practices.
- The IE shall independently score the Third-Party Bids and file the corresponding scores with the OPUC. As described herein, IPC will submit Benchmark Bids, and the IE will independently score the Benchmark Bids and file scores with the OPUC prior to opening and scoring the Third-Party Bids.
- The IE shall review IPC's sensitivity analysis for the Final Shortlist as completed per OAR 860-089-0400(5)(b) and file a written assessment with the OPUC.
- After IPC's selection of its Final Shortlist, the IE shall prepare the Closing Report, which shall provide the IE's detailed assessment of IPC's selection of the Final Shortlist of submitted bid—including but not limited to—all aspects of the solicitation process and the IE's involvement, observations, conclusions, and recommendations. Additionally, the IE shall wholly detail the reasons and basis for IPC's evaluation

and selection process including: 1) ranking Benchmark and Third-Party Bids; 2) selecting and scoring Benchmark and Third-Party Bids; and 3) rejecting Benchmark and Third-Party Bids.

- The OPUC may require the IE to monitor IPC's negotiations with bids selected to the Final Shortlist.

2.6. CONFIDENTIALITY

Bidder acknowledges and agrees that all information obtained or produced in relation to this RFP is the sole property of IPC and shall not be released or disclosed to any person or entity for any purpose other than providing a bid to IPC, without the express written consent of IPC. Bidder agrees not to make any public comments or disclosures, including statements made for advertising purposes, regarding this RFP to the media or any other party without prior written consent of IPC. Bidder shall forward any media or other inquiries regarding this RFP to IPC.

Bidders shall specifically designate and clearly label any bid material(s) or portions thereof, that the Bidder deems to contain proprietary information as "CONFIDENTIAL." IPC reserves the right to release all bid materials, including those marked "CONFIDENTIAL," to its affiliates and its affiliates' agents, advisors, and consultants, for purposes of bid evaluation. IPC will, to the extent required by law, advise each agent, advisor, or consultant that receives such claimed confidential information of its obligations to protect such information. All information, regardless of its confidential or proprietary nature, is subject to review by the Commissions and other governmental entities and courts with jurisdiction, and may be subject to legal discovery. Bidder acknowledges and agrees, IPC will provide a copy of Bidder's materials to the Commissions and IE for review and compliance with this solicitation. All Bidders whose bids are advanced to the Initial Shortlist will be required to execute a Mutual Nondisclosure and Confidentiality Agreement (Confidentiality Agreement) in the form of EXHIBIT K – Mutual Non-Disclosure Agreement with IPC prior to further discussion and evaluation of the bid by IPC.

2.7. SOLICITATION PORTAL AND RESTRICTION ON COMMUNICATIONS

IPC has opened a web-based portal hosted on the Zycus sourcing platform (the Portal). The web link to register within the Portal is zsn.zycus.com/guest/genericRegister/IDA822. Once registered, instructions will be provided within the Portal to guide Bidder's on how to upload documents. All information exchanged between the Bidder and IPC concerning the Solicitation must only be via the Portal from the time the Portal is open until it is closed by IPC. All information, including pre-bid materials, questions, and IPC's response to questions, will be posted in the Portal or on the Idaho Power website (public information) at idahopower.com/about-us/doing-business-with-us/request-for-resources/. The Portal allows a Bidder to see only its own information and not the information of other Bidders.

IPC has the ability to communicate with Bidders through the Portal. Other than written communication through the Portal, Bidders are prohibited from communicating with IPC employees, representatives, staff, or board members regarding the Solicitation during the period in which the Portal is open. Restricted communication includes, but is not limited to, "thank you" letters, phone calls, emails, and any contact that results in the direct or indirect discussion of the Solicitation and/or submitted bids. Violation of this provision by Bidders or their agents may lead to disqualification.

Bidder is responsible for ensuring it has registered for, and posts documents to, the correct portal hosted by Zycus. The Bidder registering for access to the Portal must be a representative of the Bidder and counterparty with which IPC will engage in any future negotiations, and not consultants or attorneys for the Bidder.

To ensure a competitive bid process, Bidders must not disclose its participation in this Solicitation (other than by attendance at any meeting held by IPC with respect to the Solicitation) or collaborate on or discuss with any other Bidder or potential bidding strategies or the substance of any bid(s), including and without limitation, the price or any other terms or conditions of any bid(s). This does not preclude parties from partnering in good faith to submit a competitive bid.

Questions or support needs regarding the Portal should be directed to: ResourceRFP@idahopower.com. Any questions that are relevant to all Bidders will be provided in response through the Portal.

2.8. SCHEDULE

The key milestones for the Solicitation and their currently scheduled dates are provided in Table 2-1 below.

Table 2-1 – Key Milestones for the Solicitation

Milestone	Date
Draft RFP Filed with OPUC	2/29/2024
Distribute Draft AS RFP	6/24/2024
Preliminary Bid Definition Forms Due	7/8/2024
Preliminary Bid Entry Forms Distributed to Bidders	7/17/2024
Approval of 2028 AS RFP	8/6/2024
Final RFP Distributed to Market	8/9/2024
Last Day for All-Source RFP Questions	8/14/2024
Updated Bid Definition Forms Due (if applicable)	8/15/2024
Benchmark Bids Due	8/16/2024
Updated Bid Entry Forms Distributed to Bidders (if applicable)	8/20/2024
IPC Submits Benchmark Bid Evaluations Report	8/21/2024
IE Completes Reply Comments on Benchmark Bid	9/6/2024
Third-Party Bids Due	9/6/2024
Open AS RFP Bids	9/9/2024
Bid Eligibility Screening Completed	9/16/2024
IE Submits Report on Bid Eligibility Screening	9/26/2024
Initial Bid Scoring/Ranking Complete	10/11/2024

Milestone	Date
Initial Shortlist	10/11/2024
IE Completes Review and Submits Report of Initial Shortlist	11/1/2024
IPC Notifies Bidders Selected to Initial Shortlist	11/4/2024
Bidders Provide Initial Shortlist Price/Production Update	11/11/2024
IPC Files Request for Acknowledgement of Final Short List	1/10/2024
IPC Notifies Bidders Selected to Final Shortlist	1/13/2024
IPC Begins Preliminary Contract Negotiations	1/13/2024
Contract Execution	3/15/2024
Winning Bid Guaranteed Commercial Operation Date	Before Summer 2028

This schedule and documents associated with the Solicitation are subject to change. IPC will endeavor to notify Bidders of any changes to the Solicitation but shall not be liable for any costs or liability incurred by Bidders or any other party due to a change or for failing to provide notice or acceptable notice of any change. Bidders should factor this schedule, and any changes thereto, into their project development timelines and bids.

Bidders should carefully review this RFP for questions, clarifications, defects, and questionable or objectionable materials. Comments and questions concerning clarifications, defects, and questionable or objectionable material must be submitted through the Portal and must be submitted on or before the date and time specified in the above schedule. IPC may not respond to questions submitted after this date. All questions and their applicable responses will be provided to Bidders via the Portal.

3. Proposal Specifications

A bid must demonstrate that the specifications stated in this section are satisfied.

3.1. ELIGIBLE PROPOSALS

The proposals eligible to be bid in response to the RFP are aligned with two types of electric energy and capacity products.

The first type, Resource Based Proposals, are unit-contingent energy and capacity delivered from electric resources that support the 2023 IRP capacity and energy needs, as those capacity and energy needs may be updated during the course of this RFP. All proposed Resource Based Proposals must be located within the IPC Balancing Authority (BA) area or demonstrate transmission rights to the IPC BA. Additional requirements for Resource Based Proposals are found in [Section 4](#).

The second type, Market Purchase Proposals, are firm energy (preference for WSPP Schedule C or equivalent) that meet the eligibility requirements of the Western Resource Adequacy Program (WRAP) in terms of resource

DRAFT June 10, 2024

or system specificity, transmission, and other requirements. Additional requirements for Market Purchase Proposals are found in [Section 5](#).

Table 3-1 – Resource Based Proposal Scope Summary

Scope Item	Description
Ownership and Agreement Types	<p><i>Power Purchase Agreements (PPA)</i> — Power purchase for energy, capacity, and all environmental attributes from a facility.</p> <p>Asset Purchase Agreements (which may include Build-Transfer Agreements (BTAs)) — asset acquisition of the proposed facility and related assets, where the Seller assumes development, construction, and financing risk.</p> <p>Battery Storage Agreements (BSA) — purchase of capacity and charging/discharging of a standalone battery facility.</p> <p>Any hybrid proposals that include multiple resource technologies co-located utilizing the same point of interconnection will also require operational agreements that establish protocols related to scheduling and dispatch (for example solar + BESS)</p>
Term	IPC is not prescribing a specific term requirement but prefers terms consistent with the life of the asset.
First Delivery	On or before April 1, 2028 (IPC will accept, categorize, and evaluate projects with later first delivery dates and will determine needs beyond the summer of 2028 as applicable described in Exhibit R - Supplemental 2029 and Later Bid Requirements)
Resource Status	Existing (not contracted to deliver to IPC as of or after April 1, 2028) or proposed new late-stage development with pending or executed LGIA/SGIA
Peak Capacity and Energy	For dispatchable generation (e.g., storage and gas-fired generation) to be dispatched by IPC for its full range of capacity (0–100%), contingent on the capabilities of the generator
Interconnection	IPC Transmission System or Non-IPC Transmission Systems with all necessary transmission rights to the IPC BA area
Delivery Point	Within the boundary of the BA, or outside with all necessary transmission rights to the BA
Other	Bids must include all environmental attributes, including Renewable Energy Certificates (REC). Bidders will be responsible for ensuring RECs are bundled, and that they are established through Western Renewable Energy Generation Information System (WREGIS).

	Proposed pricing for Asset Purchases shall include Operating and Maintenance (O&M), Long-Term Services Agreement (LTSA), and warranty costs for the proposed term.
--	--

Table 3-2 – Market Purchase Proposals

Scope Item	Description
Contract Structure	Agreement for purchase of firm energy and capacity (prefer WSPP Agreement Schedule C or equivalent) meeting Western Resource Adequacy Program (WRAP) eligibility requirements, including resource specificity, transmission, and other requirements. Agreement may take the form of a confirmation under a mutually agreeable master agreement (e.g., WSPP or other), or a mutually agreeable standalone agreement. See Exhibit E-Proposed Market Purchase Volumes.
Term	IPC is not prescribing a specific term requirement but prefers 3 years or more.
First Delivery	On or before April 1, 2028 (IPC will accept, categorize, and evaluate bids with later dates and will determine needs beyond the summer of 2028 as applicable)
Pricing	Index-based preferred, but IPC will consider other proposals. Pricing should not include costs of regulatory structures not applicable in Idaho or Oregon and should be based on a product with sinking in Idaho or Oregon.
Peak Capacity	See Exhibit E-Proposed Market Purchase Volumes
Energy	See Exhibit E-Proposed Market Purchase Volumes
Interconnection	IPC Transmission System, or Non-IPC Transmission Systems with all necessary transmission rights to an eligible Point of Delivery as listed in Exhibit E-Proposed Market Purchase Volumes
Delivery Point	Delivery to an eligible Point of Delivery as listed in Exhibit E-Proposed Market Purchase Volumes

3.2. ALTERNATIVE PROPOSALS

IPC may also accept other proposal types that meet the ownership and electrical functionality criteria outlined in this RFP. Bidders who submit a proposal not specifically identified in this RFP must fully describe how their bid can meet the general desires and intent of the RFP. Proposal types that are not eligible include but are not limited to; energy or capacity that is not electrical (e.g., thermal energy

storage without conversion to electric energy); renewable energy credits without the associated energy (Unbundled RECs); and financial instruments used to mitigate variable cost exposure without associated energy or capacity (Financial Firming).

3.3. TRANSMISSION ALTERNATIVES

As part of IPC's Integrated Resource Plan processes, in addition to supply- and demand-side resources, IPC is directed to give equal and balanced treatment to transmission resources. Therefore, IPC will also accept bids for transmission ownership, service, or long-term rights that may meet energy and capacity needs identified above.

4. Resource Based Proposals: Additional Specifications and Instructions

4.1. MINIMUM REQUIREMENTS

IPC has specified minimum requirements for participating bids (the Minimum Requirements) for Resource Based Proposals. These requirements are listed in EXHIBIT C – Bid Eligibility Checklist. After IE review and consultation, non-conforming bids will be notified and given the opportunity to correct their bid within five (5) business days; otherwise, the bid will be disqualified and removed from consideration. Consistent with OAR 860-089-0400(2)(c), non-price score criteria that seek to identify minimum thresholds for a successful bid have been converted into Minimum Requirements.

4.2. DELIVERY AND RESOURCE STATUS

IPC prefers bids from resources with proof of generator interconnection status and ability to deliver, such as a pending or executed Generation Interconnection Agreement (LGIA or SGIA), progress or status of the interconnection study, and/or understanding of contingent queue projects that may hinder deliverability.

4.3. OWNERSHIP AND AGREEMENT TYPES

As reflected in the Table 3-1 , Bidders are encouraged to offer bids under any of three different structures: 1) a PPA with exclusive rights for IPC to any and all capacity and environmental attributes associated with the energy generated; 2) an asset purchase, which may include a Build-Transfer Agreement (BTA) whereby the Bidder develops the project, assumes responsibility for construction, but ultimately transfers ownership of the asset to IPC or an agreement for the purchase of an existing asset; and 3) a Battery Storage Agreement (BSA) with exclusive rights for IPC to the capacity and charging/discharging of a standalone battery. For PPA bids, IPC prefers term lengths that match the life of the asset which will help in cost comparisons between Bidders. However, the term of the PPA is not a weighted score and will not advantage or disadvantage the bid on a non-price basis. IPC encourages bids regarding new resources expected to achieve commercial operation by April 1, 2028, or existing resources with remaining asset life that are not already contracted with IPC for delivery after April 1, 2028.

Bidders are encouraged to configure resources to maximize energy delivery during hours that are most valuable to IPC. Information concerning the hours that are most valuable to IPC can be found in Appendix C of IPC's 2023 Integrated Resource Plan, starting on page 92.

Bids for new resources (a Project) to be owned by IPC must assume the parties will execute a BTA. Under a BTA, the Bidder is responsible for all aspects of the development and construction of the Project, including but not limited to, permitting, design, development, engineering, procurement, construction, interconnection, and all related costs up to achieving the to-be-agreed upon milestone, which will not be earlier than mechanical completion or later than the date the Project is placed into service for tax purposes. After reaching the milestone, the Bidder will transfer ownership of the Project assets to IPC in exchange for a purchase price. Bids that contemplate the transfer of 100% equity interests in a single member LLC are acceptable. After purchase, the Bidder will remain responsible for the completion of the Project pursuant to a Construction Completion Management Agreement. Beginning at execution of the BTA and related agreements, the Bidder must post cash collateral or a letter of credit in the amounts specified in the BTA to secure its performance (Performance Security). The amount of Performance Security increases and decreases over the term of the Project development, construction, and operation phases. IPC may elect to enter other types of agreements proposed by the Bidder, including an Engineering Procurement Construction (EPC) agreement, operation and maintenance service agreements, or other arrangements that generally achieve the desired results.

Bids for existing resources (a Plant) not delivering to IPC after April 1, 2028, to be owned by IPC, must assume parties will execute an asset purchase agreement and an O&M agreement.

Bidders are directed to EXHIBIT F – Draft Form Agreements for Resource Based Proposals for more detailed information concerning the key terms and conditions of the agreements. Bidders are required to submit a redline of the Draft Form Agreements with their bids. Bidders are also directed to EXHIBIT M – Draft Form Letter of Credit for reference. In such cases that the Bidder is successful, Bidder shall be responsible for furnishing a letter of credit in a format substantially similar to the forms included in this RFP. These forms shall be subject to review and acceptance by IPC in its reasonable discretion. Bidder shall deliver the required letter of credit no later than 30 days following any such notice of award.

4.4. INTERCONNECTION STUDIES AND COST ESTIMATING

Bidder is responsible for understanding the [IPC Generator Interconnection Processes](#) or other Transmission Providers — including surplus interconnection service — considering the durations and costs of those processes in its bids, and successfully executing those processes to achieve coordination with IPC and delivery of the proposed resources to IPC on or before the dates identified in its bid. A Bidder proposing to interconnect a resource on to IPC's system must demonstrate it has submitted a Generator Interconnection (GI) request and is meeting the requirements of the GI request process, and that all known incremental costs to deliver energy from the resource to IPC's load have been included in the bid (including the interconnection facility types and cost estimates defined below). A Bidder proposing to interconnect to another Transmission Provider's system must demonstrate that

it has submitted a GI request and any required transmission service request(s) to the relevant Transmission Providers and that it is meeting the requirements of those processes.

IPC has an updated [Transitional Cluster Study Process](#) that should be considered when responding to this RFP.

The Transmission Provider function within IPC, separate and apart from the Evaluation Team, performs studies for GI application requests. The studies are performed to determine the feasibility, cost, time to construct, and injection capability for the interconnection of an electric generating resource. Information concerning GIs can be found on IPC’s website at [Generator Interconnection — Idaho Power](#), including information on *Public Utility Regulatory Policies Act of 1978* (PURPA) Qualifying Facility (QF) interconnections, Non-PURPA GIs, and Facility Connection Requirements. IPC posts the results of these studies on its Open Access Same-Time Information System (OASIS) website.

Bidders must provide the GI request identifier(s) (the queue position) associated with its resource in its bid. If the resource identified in the bid was in the queue but has since withdrawn, the Bidder should provide that queue position even though it is no longer active.

The interconnection facility types and cost estimating requirements are specified below.

- Interconnection Customer’s Interconnection Facilities (ICIF) are all facilities and equipment (including the generation tie line) located between the resource and the Point of Change of Ownership. Bidder must submit resource-specific cost estimates of ICIF as part of its bid and consider the cost of ICIF in its pricing.
- Transmission Provider Interconnection Facilities (TPIF) connect the Interconnection Customer’s Interconnection Facilities to the Transmission Provider transmission system and facilitate the metering, relaying and communications, etc. TPIF are all facilities owned, controlled, or operated by the Transmission Provider from the Point of Change of Ownership to the Point of Interconnection. These are facilities that the Transmission Provider will own, and the Bidder will fund. Bidder must submit resource-specific cost estimates of TPIF as part of its bid and consider the cost of TPIF in its pricing. In the absence of an estimate, IPC will develop an estimate based on the information provided in Table 4-1 below or other available information. If an interconnection study has been performed by the Transmission Provider that includes an estimate of TPIF, then the costs from that study should be used in lieu of these estimates.

Table 4-1 – Estimated Cost for TPIF

Voltage	TPIF Estimated Cost (2023 \$ 000s)
138 kV	\$3,000
230 kV	\$4,000
345 kV	\$5,000

- Station Network Upgrades (SNU) are either new switchyards or additions to existing switchyards or substations that are built to interconnect the generator to the IPC transmission or distribution system. SNUs become a component of the integrated IPC transmission or distribution system and are incorporated into IPC tariffs. Bidders are required to provide cost estimates of SNUs.
- Delivery Network Upgrades (DNU) are upgrades to IPC’s transmission or distribution network that will be required for individual resources and groups of resources. These upgrades will be incorporated into IPC’s transmission or distribution tariffs. Bidders are required to provide cost estimates of DNUs.

Based on information available from the GI request and/or studies and estimates performed by the Transmission Provider(s), separate and apart from the Evaluation Team (if available), the Evaluation Team will determine bid-specific SNUs and DNUs and associated costs to include in the evaluation of a bid. The Evaluation Team’s development of bid-specific SNUs/DNUs does not take the place of the IPC Open Access Transmission Tariff (OATT) GI and transmission studies, and does not remove the Bidder’s obligation to submit GI or transmission requests to the Transmission Provider(s).

With respect to transmission service, for resources that will be owned in full or in part by IPC or for which IPC will have an executed contract for the purchase of the generation, IPC anticipates that it will designate the resource or executed contract as Network Resources of IPC under the OATT upon commercial operation of the resource or first delivery date under the contract. Projects that are seeking to interconnect to IPC’s system and have not requested Network Resource Interconnection Service (NRIS) may need additional costs added to account for additional upgrades needed to ensure delivery to load.

4.5. BID SUBMISSION PROCESS

A Bid Package is considered the aggregate of the information uploaded by a Bidder to the Portal. The Bid Package will include data entered into forms on the Portal and subsequently uploaded to the Portal by the Bidder and other written documents that are uploaded to the Portal (Information). The Portal is designed to accept the majority of the Information as data entered into the forms with data entry restricted to only certain eligible types and values. The purpose is to ensure Information is entered consistently across all Bidders and bids such that IPC can consistently, fairly, and quickly organize the Information, evaluate the bids, and minimize the amount of written (e.g., PDF, .docx) documents that IPC must review and interpret.

i Bid Definition Form and Selectable Portfolio

Any potential Bidder interested in participating in the RFP must first register in the Portal. Once registered, the bid submission process begins with completion and submission to IPC of an EXHIBIT A – Bid Definition Form (BDF) located in the Portal for each bid that a Bidder intends to submit. The BDF requests preliminary Information about the bid(s) and associated resources including a narrative description and basic bid parameters.

Within the BDF, a Bidder may identify bids that include two or more resources, that if executed by IPC together, may result in a lower total price or greater benefit to IPC than if the resources were not transacted on together (Selectable Portfolio). An example of a Selectable Portfolio is a solar resource, wind resource, and a storage resource where the Bidder would not offer or contract any one of the individual components, but rather all three are contingent. Another example is a 100 MW solar PPA bid and a 100 MW solar asset purchase bid from a 200 MW solar project. If a Bidder desires to combine, or make contingent, multiple bids of various structure, ownership, term, or resource types, then the Bidder will indicate within the BDF the combination of bids that make a Selectable Portfolio. A Selectable Portfolio will be evaluated as a complete bid such that if it were selected, the entire Selectable Portfolio would be reviewed for further evaluation.

ii Bid Entry Form

IPC will review the submitted BDF and subsequently respond to the Bidder with an EXHIBIT B – Bid Entry Form (BEF) that is relevant to the bid(s). The BEF requests complete technical, commercial, financial, and pricing Information for purposes of subsequent bid evaluation.

iii Hourly Renewable Production Template

In addition to the BEF, IPC will provide EXHIBIT Q - Hourly Renewable Production Template that is relevant to the bid(s). The Hourly Renewable Production Template will provide the format for the hourly forecasted P90 and P50 energy production profiles of any proposed intermittent renewable resources.

iv Bid Submittal

Bidders will submit the BEF, Hourly Production Template, and ancillary Information as defined in the RFP to the Portal. The BEF requires certain cost data as inputs to the price score model.

IPC will provide each Bidder with Bid Fee instructions to accompany the BEF and the Hourly Renewable Production Template when these forms are provided to the Bidder.

Bidders are strongly advised to carefully review all exhibits relevant to their bids prior to uploading a Bid Package to the Portal. If and when a Bidder is selected for negotiation of an agreement, IPC will utilize the Information submitted in the Bid Package to populate the relevant portions of the agreements for that Bidder.

4.6. EVALUATION FEES

A Resource Based Proposal Bidder is required to submit to IPC a non-refundable fee with each bid submitted (Evaluation Fee). The purpose of the Evaluation Fee is to encourage submission of well-developed and viable bids and to offset the cost to IPC for evaluation of bids. For each bid

submitted, the Bidder may submit a sub-bid at a reduced Evaluation Fee as described below. Bidders must use the following guidance for the purpose of determining and submitting the Evaluation Fees, due with each bid and sub-bid.

Bid	Fee	Example
A single site and resource type (can include multiple structures, terms, and price)	\$9,928	Site Alpha, 200 MW Solar PV, PPA, 35-yr <i>and</i> Site Alpha, 200 MW Solar PV, Asset Purchase
Same site and resource type but different capacity or initial delivery year	+\$4,964	Site Alpha, 400 MW Solar PV, Asset Purchase
Different site = different bid	\$9,928	Site Bravo, 150 MW BESS, 20-yr, BSA
Different resource = different bid unless the different resource is part of, and required, as part of the Selectable Portfolio	\$9,928	Site Alpha, 300 MW Wind, Asset Purchase (different bid = \$9,928) <i>or</i> Site Alpha, 300 MW Wind, Asset Purchase contingent on Site Alpha, 200 MW Solar PV, PPA, 35-yr as a Selectable Resource only (not a different bid)

IPC may deem a bid that does not satisfy the requirements for a single bid as multiple bids, each of which would require a separate Evaluation Fee. If IPC deems a Bidder’s bid to be multiple bids, IPC will notify the Bidder and allow the Bidder to elect to pay the incremental Evaluation Fee or to revise its bid to comply with IPC’s requirements for a single bid.

4.7. EXCEPTIONS TO THE DRAFT FORM AGREEMENTS

Bidders must provide bids and pricing that are consistent and compliant with EXHIBIT F – Draft Form Agreements for Resource Based Proposals. To the extent that the validity of a Bidder’s bid and/or the Bidder’s ability to execute an agreement is contingent upon material changes to the language in the draft form agreements, the Bidder should specifically identify the terms they propose to change in the form of a redline markup and submit the redline with its bid. To the extent that a Bidder wishes to propose changes to the draft form agreements that, if accepted by IPC, would reduce the Bidder’s proposed pricing the proposed changes should specifically identify in the redline, such changes and the associated price reduction. To the extent practicable, Bidders should develop exhibits, schedules, attachments, and other supplemental documents required by the draft form agreements in the redline. Bidders proposing to sell existing generation facilities should propose in the redline changes to the draft form agreements for the proposed resource type reflecting the terms and conditions on which their bid is based. Note that not every technology and contract structure is

presented in the draft form agreements and, thus, proposed contracts and terms should be provided for contracts that are substantively different to the provided draft form agreements. For a Wind PPA, Bidders should review and redline the substance of the EXHIBIT F – Power Purchase Agreement commercial terms with the inclusion of the EXHIBIT F – Wind Performance Guarantees.

The proposed changes must be specific and include a detailed explanation and supporting rationale for each. General comments, drafting notes and footnotes such as “parties to discuss” will be disregarded and not negotiated. Exceptions to the draft form agreements requested by a Bidder will be reviewed as part of IPC’s qualitative evaluation of the bid.

4.8. EXCEPTIONS TO THE TECHNICAL SPECIFICATIONS

Bidders that propose a resource for IPC ownership must provide bids and pricing that are consistent and compliant with the applicable Technical Specifications provided as exhibits to this RFP (namely EXHIBIT G – BESS Technical Specifications; EXHIBIT H – Solar Technical Specifications; EXHIBIT I – Wind Technical Specifications; and EXHIBIT J – Gas-Fired Convertible to Hydrogen Specifications). To the extent that the validity of a Bidder’s bid and/or the Bidder’s ability to execute an agreement is contingent upon material changes to the language in the Technical Specifications, the Bidder must specifically identify the specifications it proposes to change in the form of a redline markup to the Technical Specification and submit the redline with its bid. To the extent that a Bidder wishes to propose changes to the Technical Specification that, if accepted by IPC, would reduce the Bidder’s proposed pricing, the Bidder should specifically identify in the redline, such changes and the associated price reduction. To the extent practicable, Bidders should develop exhibits, schedules, attachments, and other supplemental documents required by the Technical Specification in the redline. The proposed changes must be specific and include a detailed explanation and supporting rationale for each. General comments, drafting notes and footnotes such as “parties to discuss” will be disregarded and not negotiated. Exceptions to the Technical Specifications requested by a Bidder will be reviewed as part of IPC’s qualitative evaluation of the bid. [Note that not every technology is presented in the technical specifications and, thus, proposed technical specifications should be provided for technologies that are substantively different to the provided technical specifications.](#)

4.9. EXCEPTIONS TO THE DRAFT FORM LETTER OF CREDIT

Bidders that propose a resource for IPC ownership must provide bids and pricing that are consistent and compliant with the EXHIBIT M – Draft Form Letter of Credit. To the extent that the validity of a Bidder’s bid and/or the Bidder’s ability to execute an agreement is contingent upon material changes to the language in the draft form letter of credit, the Bidder should specifically identify the terms they propose to change in the form of a redline markup to EXHIBIT M – Draft Form Letter of Credit and submit the redline with its bid. To the extent that a Bidder wishes to propose changes to the draft form letter of credit that, if accepted by IPC, would reduce the Bidder’s proposed pricing for the bid, should specifically identify in the redline such changes and the associated price reduction.

The proposed changes must be specific and include a detailed explanation and supporting rationale for each. General comments, drafting notes, and footnotes such as “parties to discuss,” will be

disregarded and not negotiated. Exceptions requested by a Bidder will be reviewed as part of IPC’s qualitative evaluation of the bid.

5. Market Purchase Proposals: Additional Specifications and Instructions

5.1. MINIMUM REQUIREMENTS

IPC has specified the Minimum Requirements for Market Purchase Proposals. These requirements are listed in EXHIBIT C – Bid Eligibility Checklist. After IE review and consultation, non-conforming bids will be notified and given the opportunity to correct their bid within five (5) business days; otherwise, the bid will be disqualified and removed from consideration. Consistent with OAR 860-089-0400(2)(c), non-price score criteria that seek to identify minimum thresholds for a successful bid have been converted into Minimum Requirements.

5.2. AGREEMENT TYPES

IPC will consider bids for agreements consisting of confirmations under mutually-agreeable master agreements (i.e., WSPP or other), or mutually-agreeable standalone agreements.

5.3. BID ATTRIBUTES

Additional description of the volumes and bid attributes Idaho Power is seeking are listed in EXHIBIT E – Proposed Market Purchase Volumes. IPC anticipates that it will designate the resource or executed contract as Network Resources of IPC under the OATT upon commercial operation of the resource or first delivery date under the contract.

5.4. BID SUBMISSION PROCESS

A Bid Package is considered the aggregate of the Information uploaded by a Bidder to the Portal. The Bid Package will include data entered into forms on the Portal and subsequently uploaded to the Portal by the Bidder and other written documents that are uploaded to the Portal. The Portal is designed to accept the majority of the Information as data entered into the forms with data entry restricted to only certain eligible types and values. The purpose is to ensure Information is entered consistently across all Bidders and bids such that IPC can consistently, fairly, and quickly organize the Information, evaluate the bids, and minimize the amount of written (e.g., PDF, .docx) documents that IPC must review and interpret.

i Bid Definition Form

Any potential Bidder interested in participating in the RFP must first register in the Portal. Once registered, the bid submission process begins with completion and submission to IPC of an EXHIBIT A – Bid Definition Form (BDF) located in the Portal for

each bid that a Bidder intends to submit. The BDF requests preliminary information about the bid(s) including a narrative description and basic bid parameters.

ii Bid Entry Form

IPC will review the submitted BDF and subsequently respond to the Bidder with an EXHIBIT B – Bid Entry Form (BEF) that is relevant to the bid(s). The BEF requests complete technical, commercial, financial, and pricing Information for purposes of subsequent bid evaluation.

iii Bid Submittal

Bidders will submit the BEF and ancillary Information as defined in the RFP to the Portal. The BEF requires certain cost data as inputs to the price score model.

IPC will provide each Bidder with Bid Fee instructions to accompany the BEF and the Hourly Renewable Production Template when these forms are provided to the Bidder.

Bidders are strongly advised to carefully review all exhibits relevant to their bid(s) prior to uploading their Bid Package to the Portal. If and when a Bidder is selected for negotiation of an agreement, IPC will utilize the Information submitted within the Bid Package to populate the relevant portions of the agreements for that Bidder.

6. Additional Requirements for All Bid Packages

6.1. CONTENTS OF WRITTEN BID PROPOSAL

A Bidder **MUST** prepare and submit as part of the bid a written narrative that fully describes the bid and any details or nuances to fully explain the intent of the Bidder and the BEF. The narrative should include a **cover letter and introduction, company and project overview, a description of each bid submitted in the BEF, and project financing and contract terms** according to Exhibit N – Bid Format and Requirements.

6.2. BID NAMING

A unique name for each bid (Bid Code) will be provided to the Bidder and must thereafter be used by the Bidder when referring to the bid and must be inserted into the file name of each document for the bid uploaded by the Bidder. The purpose of the Bid Code is to allow IPC to more easily identify and differentiate among bids and documents.

6.3. BID WRITTEN DOCUMENTS

Written documents must be text-searchable PDF (portable document format, non-zipped) and must contain documents reproduced directly from the native document (i.e., Word, Excel, MicroStation, AutoCAD). Scanned images and documents will be considered irregular and may be rejected.

6.4. RFP EXHIBITS

Exhibits to this RFP summarize the Information that must be included within the Bid Packages and uploaded by Bidders to the Portal. Bidders are directed to the individual forms in the Portal to ensure review of all the current information and the specific type and level of detail that must be provided is understood and are summarized below. In Table 6-1 are the required exhibits that must be completed depending on the type of contract offered.

Table 6-1 – Bid Package Requirements

Exhibit	Asset Purchase	PPA/BSA	Market Purchase Proposals
Exhibit B – Bid Entry Form	X	X	X
Redlines to Exhibit F – Draft Form Agreements for Resource Based Proposals	X	X	
Redlines Exhibit G, H, I, and J (Technical Specifications)	X		
Exhibit L – Counterparty Financial Questionnaire	X	X	X
Redlines to Exhibit M – Draft Form Letter of Credit	X	X	
Proposal Narrative consistent with Exhibit N - Bid Format and Requirements	X	X	X
Exhibit Q - Hourly Renewable Production Template	X	X	

6.5. FIRM BID

Each bid shall be firm, not subject to price escalation, and binding throughout the schedule of this RFP from the date the bids are due under this RFP. Note, however, the bid evaluation process does have an opportunity to update pricing.

6.6. TAXES

Bidders are responsible for the payment of all sales, conveyance, transfer, excise, real estate transfer, business and occupation, and similar taxes assessed with respect to or imposed on either party in connection with a proposed agreement.

6.7. DATA AND CYBER SECURITY

A bid must comply with the provisions of Presidential Executive Order 13920 (E.O. 13920) issued May 1, 2020, titled *Securing the United States Bulk-Power System (BPS)*, which (among other things) prohibits any acquisition, importation, transfer or installation of BPS electric equipment by any person or with respect to any property to which a foreign adversary or an associated national thereof has any interest that poses an undue risk to the BPS, the security or resiliency of United States (U.S.) critical infrastructure or the U.S. economy, or U.S. national security.

All design and implementation details must follow electrical industry best practices for cyber security as well as all applicable regulatory requirements pertaining to the security of electric system assets. Any additional IPC-specific requirements will be addressed during the RFP review and contracting process, pursuant to EXHIBIT K – Mutual Non-Disclosure Agreement. Bidder must state that any and all equipment utilized in the proposed resource will not be procured through an Office of Foreign Assets Control (OFAC) designated entity or otherwise be comprised of equipment prohibited for use by electric utilities in the U.S.

6.8. PURCHASING RESTRICTIONS/PROHIBITED TECHNOLOGY

Pursuant to Section 889 of the John S. McCain National Defense Authorization Act for Fiscal Year 2019 and Federal Acquisition Regulation (FAR) 52.204-25 (August 2020), Bidder agrees, represents, and warrants that Bidder shall not supply or deliver to IPC any “covered telecommunications equipment or services” as a substantial or essential component of any system or critical technology of any system. As defined in FAR 52.204-25(a), “covered telecommunications equipment or services” includes equipment, systems, products, or services made by any of the following companies, or any subsidiary or affiliate thereof (including companies with the same principal word in the name, e.g., “Huawei” or “Hytera”): Huawei Technologies Company; ZTE Corporation; Hytera Communications Corporation; Hangzhou Hikvision Digital Technology Company; or Dahua Technology Company. “Covered telecommunications equipment or services” may include, but are not limited to, video/monitoring surveillance equipment/services, public switching and transmission equipment, private switches, cables, local area networks, modems, mobile phones, wireless devices, landline telephones, laptops, desktop computers, answering machines, teleprinters, fax machines, and routers. “Covered telecommunications equipment or services” do not include telecommunications equipment that cannot route or redirect user data traffic or permit visibility into any user data or packets that the equipment transmits or handles.

To the extent that the systems, products, or services to be provided by Bidder under this Agreement may be procured by IPC in support of or to satisfy IPC’s obligations under agreements with a federal governmental entity, Bidder further agrees that FAR 52.204-25 (August 2020) — except for paragraph (b)(2) thereof — shall be incorporated by reference into any future agreement and is binding on Bidder, and that Bidder does not use any equipment, system, or service that uses covered telecommunications equipment or services and will not supply any covered telecommunications equipment or services to IPC. Bidder further agrees that, if it identifies covered telecommunications equipment or services used as a substantial or essential component of any system or as critical technology as part of any system during contract performance, or Bidder is notified of such by a subcontractor at any tier or any other source, Bidder shall immediately notify IPC and reasonably cooperate with IPC’s requests for information.

6.9. SMALL BUSINESS AND SMALL DISADVANTAGED BUSINESS PROGRAM

IPC is committed to the implementation of a Small and Disadvantaged Business Program. It is the intent of IPC that small business concerns and small businesses owned and controlled by socially and economically disadvantaged individuals have the opportunity to participate in the performance of

contracts awarded by IPC. Consequently, IPC requests that Bidders indicate their eligibility as a small business based upon the regulations in Title 13, Code of Federal Regulations, Part 121. If in doubt, Bidders should consult the Small Business Administration Office in their area.

6.10. INSURANCE

Bidder is directed to the EXHIBIT F – Draft Form Agreements for Resource Based Proposals for details concerning the specific insurance requirements that must be met.

6.11. FINANCIAL AND CREDIT INFORMATION

Bidder must provide a written response and associated documents in response to the Counterparty Financial Questionnaire. Details are further described in EXHIBIT L – Counterparty Financial Questionnaire of this RFP.

6.12. CLARIFICATION OF BIDS

While evaluating a bid, IPC may request clarification or additional information from the Bidder about any item in its bid. Such requests will be sent via the Portal by IPC and the Bidder must provide a response via the Portal back to IPC within five (5) business days, or IPC may deem the Bidder to be non-responsive and either suspend or terminate further evaluation of its bid. Bidders are encouraged to provide an alternate point of contact to ensure a timely response to clarification requests.

6.13. ADDENDA TO RFP

Any additional responses required from Bidders as a result of an addendum to this RFP shall become part of each bid. Bidders must acknowledge receipt of and list all addenda where indicated in the BEF.

7. Bid Evaluation, Negotiation and Approval

7.1. THE EVALUATION PROCESS

The bid evaluation and selection process are designed to identify the combination and size of proposed resources (the Portfolio) that will maximize customer benefits and will satisfy projected resource capacity and energy needs while maintaining reliability. The portfolio optimization models used to identify the proposed resources are the same that IPC uses to evaluate proxy resources in the *2023 IRP* (and subsequent IRPs). IRP portfolio optimization process details can be found in the company's most recent *2023 IRP* report in sections 9 and 10.

IPC will separate and prioritize bids that can conform to meet the summer peak in 2028 and desire a commercial operation date by April 1, 2028, separately from those that confirm to meet a later commercial operation. [Those bids that confirm to meet a later commercial operation date will be evaluated subsequent to those that can meet the summer peak 2028, as described in Exhibit R - Supplemental 2029 and Later Bid Requirements.](#)

The bid evaluation process is described below.

7.2. PHASE 1 – INITIAL SHORTLIST

Phase 1 of the bid evaluation process includes the screening, evaluation, and ranking of the bids to identify a subset that can be advanced to further evaluation (the Initial Shortlist). This includes: 1) bid eligibility screening to ensure conformance with the Minimum Requirements; 2) price, and non-price evaluation to score and rank bids; and 3) identification of the lowest cost bids for inclusion in the Initial Shortlist.

IPC will rely on the pricing and other data submitted by Bidders to screen, evaluate, and rank bids. During this phase of the bid evaluation process, IPC does not anticipate asking for, nor accepting, updated pricing or updates to any other bid components. However, IPC will contact Bidders to confirm and clarify information presented in each bid if necessary.

Additionally, if at any time during Phase 1, a Bidder determines its submitted bid is no longer valid, the Bidder should notify IPC immediately and the bid will be withdrawn from further consideration.

Conformance to Minimum Requirements

Bids will initially be screened against the Minimum Requirements using EXHIBIT C – Bid Eligibility Checklist and in consultation with the IE. After IE review and consultation, Bidders of non-conforming bids will be notified and given the opportunity to correct their bid within five (5) business days; otherwise, the bid will be removed from consideration.

Price and Non-Price Scoring, Ranking, and Initial Shortlist

After the eligibility screening has been completed, conforming bids will be evaluated and given price and non-price scores. Each bid will be ranked based on the sum of their price and non-price bid score. A maximum of 75 points are allocated to price scoring and a maximum of 25 points to non-price scoring for a total maximum score of 100 points. Bids are then ranked within the respective technology group, and the highest scoring bids within each technology group are chosen to be the Initial Shortlist. Reasonable excess to, at a minimum, meet the identified capacity and energy needs specified will be included.

Resource Based Proposal Price Score (up to 75 points)

IPC's proprietary price scoring model will calculate the delivered revenue requirement per kilowatt cost of each bid, inclusive of any applicable carrying cost and the impact of tax credit benefits, as applicable. In developing the revenue requirement cost for each bid, IPC requires certain cost data as inputs to the price score model. IPC will convert Bidder provided cost inputs into a revenue requirement stream based on Generally Accepted Accounting Principles (GAAP) and develop annual levelized costs as described in Exhibit O – Levelized PVRR Scenarios. Any internal assumptions for key financial inputs (i.e., inflation rates, discount rates, marginal tax rates, asset lives, allowance for funds used during construction [AFUDC] rates, etc.) and IPC's carrying costs (i.e., integration costs, owner's costs, etc.) will be applied consistently to all bids, as applicable.

As stated under Interconnection Studies above, Bidders must provide known costs for interconnection costs and transmission network upgrade costs as provided in applicable system impact study reports or LGIAs. If this information is not available, IPC will model the bids with an anticipated cost based on the location of the interconnection point. IPC will model bids with other uncertain terms and anticipated cost or price contingencies as applicable.

IPC's proprietary price scoring model scores each bid relative to each other within the same technology where feasible. Each bid's per kilowatt price is ranked to determine the bid's price score. For each technology, a maximum score of 75 points is assigned to the bid with the highest calculated relative score and a minimum of zero (0) points to the evaluated bid with the lowest calculated relative score. The remaining bids using that same technology are scored on a 0-to 75-point scale according to their relative relationship to those of the highest and lowest performing bids.

Resource Based Proposals Non-Price Score (up to 25 points)

The non-price evaluation rubric for Resource Based Proposals is included in EXHIBIT D – Non-Price Scoring Matrix. IPC's non-price scoring model evaluates whether bids are thorough and comprehensive, whether the proposed resource is viable, and whether the bidder is likely to achieve commercial operation by the proposed date. Bidder must provide documentation, representation, warranties, and other information as necessary to sufficiently assure IPC that any proposed project will complete construction and achieve full commercial operation by the defined commercial operation date. The non-price rubric is designed to be objective, intuitive, and self-scoring. Bidders are required to score themselves by answering each of the non-price questions and providing supporting documentation. The non-price questions seek to rank bids based, among other factors, on the completeness of RFP bid requirements, the ability to contract with the project, the maturity of the project, and ability to deliver the project by the commercial operation deadline.

Points are earned based on the Bidder's progress and performance in the following areas:

- Contract Risk
- Site Control
- Permits
- GIA
- NRIS/ERIS
- Experience
- Safety
- Financing
- Development Schedule
- Existing Conditions (existing resources only)

If a Bidder is unable to demonstrate commercial viability — specifically the ability to meet the applicable in-service date — they will be removed from further evaluation. Each question is weighted differently with a focus on current progress of a Project. Weightings are outlined in Exhibit B of this RFP. The maximum score possible for non-price questions is 25 points.

Market Purchase Proposals Price Evaluation

Market Purchase Proposal pricing will be evaluated and ranked based on the price structure submitted with the bid. This initial scoring is for informational purposes. As noted below, the Market Purchase Proposals that meet Minimum Requirements will be submitted to the IRP Planning Team for further analysis.

Market Purchase Proposals Non-Price Score (up to 25 points)

The non-price evaluation rubric for Market Purchase Proposals is included in EXHIBIT D – Non-Price Scoring Matrix. IPC’s non-price scoring model evaluates whether bids are thorough and comprehensive and meet the requested attributes as described in EXHIBIT E – Proposed Market Purchase Volumes. Bidder must provide documentation, representation, warranties, and other information as necessary to sufficiently assure IPC that any bid will meet the requirements. The non-price rubric is designed to be objective, intuitive, and self-scoring. Bidders are required to score themselves by answering each of the non-price questions and providing supporting documentation. The non-price questions seek to rank bids based, among other factors, on the completeness of RFP bid requirements and the bid’s ability to meet the requested attributes described in EXHIBIT E – Proposed Market Purchase Volumes.

Points are earned based on the bid’s ability to meet each of the bid attributes requested in EXHIBIT E – Proposed Market Purchase Volumes. If a bid offers attributes that could require Idaho Power to incur additional costs (i.e., a bid of a WSPP Schedule B product could require Idaho Power to incur additional Point-to-Point transmission costs), those costs will be estimated and included in the pricing analysis. Each question is weighted differently with a focus on product type, contribution to identified needs, shaping and flexibility options, Western Resource Adequacy Program eligibility, point of delivery, and pricing structure. The maximum score possible based on pre-determined weightings is 25 points. This initial scoring is for informational purposes. As noted below, the Market Purchase Proposals that meet Minimum Requirements will be submitted to the IRP Planning Team for further analysis.

Final Ranking (up to 100 points)

To determine the initial bid pool to be further evaluated, IPC will use the combined price and non-price results to rank each bid. Based on these rankings, IPC will identify an initial pool of highest-ranked bids by product and technology. This initial pool of bids will be made available as alternatives for further modeling.

Selection of the Initial Shortlist and Notification by IPC

The highest ranking and relatively lowest cost bids within each technology category will become the Initial Shortlist. After the IE completes its review and files its report on the Initial Shortlist, IPC will notify through the Portal the Bidders that were selected for the Phase 1 – Initial Shortlist.

7.3. PHASE 2 – FINAL SHORTLIST

Phase 2 is the selection of the Final Shortlist. Bidders on the Initial Shortlist will be required to provide IPC with any updates to their bids including relevant price or schedule modifications, interconnection study results, or any other material change that would impact the IRP production cost model or Minimum Requirements of the RFP. IPC will then process updates for inclusion in the IRP production cost models. AURORA will be run to help select the least-cost, least-risk portfolios based on bid cost, performance data, and ELCC.

IPC will perform a reliability assessment to ensure that the selected portfolio of resources can meet all hourly load and operating reserve requirements with sufficient cushion to account for other system uncertainties such as non-normal weather events. This process is described in the company's most recently acknowledged *2023 IRP* in the Technical Appendix C in the "Loss of Load Expectation" section.

IPC does not anticipate updating the non-price portion of the bid evaluation from Phase 1. However, if at any time during Phase 2, a Bidder determines its submitted bid is no longer valid, the Bidder should notify IPC immediately and the bid will be withdrawn from further consideration. Original non-price scores combined with IRP modeling results will be considered in a cost and risk analysis. Any other factors not expressly included in the formal evaluation process but required by applicable law, order by the Commissions, or other significant material industry or technology change may be used by IPC — in consultation with the IE — to identify a subset of Bidders from Phase 1 that can be advanced to further evaluation and negotiation (the Final Shortlist).

Processing of Bid Updates

Similar to the Phase 1 pricing evaluation, IPC uses its proprietary models to process bid updates. The models are refreshed with updated bid information, including price. Consistent with the treatment of capital revenue requirement in IPC's IRP modeling, IPC will convert any calculated revenue requirement associated with capital costs (i.e., return on investment, return of investment and taxes, and the impact of tax credits, as applicable) to first year real-levelized costs. Similarly, all other bid costs are levelized and formatted for input into the IRP models. Projected renewable resource performance data (expected hourly capacity factor information) and ELCC are also processed for input into the IRP models.

Bid Resource IRP Modeling, Sensitivity Analysis and Portfolio Development

The IRP team uses the AURORA model to help select the least-cost, least-risk resource types based on bid cost, performance data and ELCC and select the Final Shortlist. IPC uses AURORA to develop and evaluate the cost of multiple resource portfolios with various sensitivities and contingencies.

Following the Initial Shortlist and bid updates, IPC will submit the pool of bids (including Market Purchase Proposals that have met the Minimum Qualifications) to its IRP Planning Team to evaluate resources for the Final Shortlist. The IRP Planning Team will evaluate the pool of resources using AURORA, the production cost model used in the IRP. Consistent with the treatment of capital revenue requirement in IPC's IRP modeling, IPC will convert any calculated revenue requirement associated with capital costs (i.e., return on investment, return of investment, and taxes, and the impact of tax credits, as applicable) to first year-real-levelized costs. Similarly, all other bid costs are levelized and formatted for input into the IRP models. For a 25-year PPA for example, IPC calculates the present value of the revenue requirement (contractual payment stream over the 25 years) for the project and calculate the levelized payment based on the contract life as demonstrated in the example Exhibit O – Levelized PVRR Scenarios. Projected renewable resource performance data (expected hourly capacity factor information) will also be processed for input into the IRP models. Projected Effective Load Carrying Capability (ELCC) for each bid will also be processed for input into the IRP models. The IRP modeling tools will help select the least cost resource types based on bid cost, performance data, and ELCC. IPC's Final Shortlist may also include high-scoring bids in excess of the identified capacity limits if those projects have economic benefit.

IPC will evaluate portfolios under a range of different environmental policy and market price scenarios (policy-price scenarios). In this way, IPC uses AURORA to help optimize its selection of bid resources to identify the lowest cost, reliable portfolio under multiple scenarios prior to undergoing additional risk analysis and further consideration as part of the Final Shortlist process. The assumptions will be established and reviewed with the IE before updated bids with best and final pricing are received and opened.

Risk Analysis

IPC next uses AURORA to evaluate each portfolio and its ability to perform under dynamic market conditions. In AURORA a stochastic sensitivity analysis will be performed, which assesses the effect on portfolio costs when select variables take on values different from their planning-case levels. AURORA measures the risk of each portfolio through its production cost estimates. By holding a resource portfolio fixed and using Latin Hypercube stochastic simulations of stochastic variables — including, for example, load, natural gas prices, and hydro generation — AURORA can measure the expected cost of each portfolio in an uncertain future. Stochastic variables are selected based on the degree to which there is uncertainty regarding their forecasts and the degree to which they can affect the analysis results (i.e., portfolio costs). The Latin Hypercube design samples the distribution range with a relatively small sample size, allowing a reduction in simulation run times. The Latin Hypercube method does this by sampling at regular intervals across the distribution spectrum. The purpose of the stochastic analysis is to understand the range of portfolio costs across the full extent of stochastic shocks (i.e., across the full set of stochastic iterations) and how the ranges for portfolios differ.

Identification of Top-Performing Resource Portfolios

IPC will then summarize and analyze the portfolios to identify the specific bid resources that are most consistently selected among the policy-price scenarios. Based on this data, as well as certain

qualitative and non-price criteria, and in consultation with the IE, IPC may select one or more resource portfolios for further cost-risk analysis.

Other Factors – Applicable Law and Statutory Requirements

Before establishing a Final Shortlist, IPC may take into consideration, in consultation with the IE, other factors that are not expressly or adequately factored into the evaluation process outlined above, particularly any factor required by applicable law or order of either Commission to be considered.

Final Shortlist Selection

IPC will summarize and evaluate the results of its cost-risk analysis, considering present value revenue requirement results to identify the specific least-cost, least-risk bids. Based on these data and certain other factors as described above, and in consultation with the IE, IPC will establish a Final Shortlist. After the Final Shortlist is established and approved, IPC will re-engage in negotiations with the selected Bidder(s) to finalize their contract(s) and prepare the contract(s) for execution. Selection of a bid to the Final Shortlist does not constitute a winning bid. Only execution of a definitive agreement between IPC and the Bidder, on terms acceptable to IPC, in its sole and absolute discretion, will constitute a winning bid.

7.4. ADDITIONAL RIGHTS

IPC may, in coordination with OPUC and the IE, at any time during the Solicitation:

1. Appoint evaluation committees to review bids, seek the assistance of outside technical experts and consultants in bid evaluation, and seek or obtain data from any source that has the potential to improve the understanding and evaluation of the responses to this RFP.
2. Revise and modify, at any time before the deadline for bid submittal, the factors it will consider in evaluating bids and to otherwise revise or expand its evaluation methodology.
3. Hold interviews and meetings to conduct discussions and exchange correspondence with either all Bidders or only those with bids that IPC elects to select for detailed discussions (Initial Shortlisted Bids) in order to seek an improved understanding and evaluation of an individual Bidder's bid.
4. Issue a new RFP.
5. Cancel or withdraw the entire RFP or any part thereof.

7.5. ACCEPTANCE AND REJECTION OF BIDS

IPC may or may not award an agreement after analysis and evaluation of the bids. IPC reserves the right to reject any and all bids, to waive minor formalities and irregularities, and to evaluate the bids to determine which — in IPC's sole judgment — represents the best value for the Proposals requested.

7.6. AGREEMENT NEGOTIATIONS

In anticipation of an award, there will be a period of negotiations to finalize the agreement(s) between the parties. An agreement, including all terms, conditions, exhibits and attachments, must be executed

by both IPC and the successful Bidder in order to create a binding enforceable agreement between IPC and the successful Bidder.

7.7. EXCLUSIVITY

If and when a bid is selected for the Final Shortlist, from that date, the Bidder and/or its affiliates shall not execute an agreement with any other party for the sale of the Project or Plant such that the Bidder would no longer be able to provide the associated bid for a period of sixty (60) days.

7.8. PUBLICITY

The parties intend to issue joint public announcements, in the form of press releases, case studies, and/or other materials, containing content mutually agreed to by the parties, upon execution of the agreements. Neither party shall use the name, logo, or any other indicia of the other party in any public statement, press release, other public relations, or marketing materials, the identity of the other party or any underlying information with respect to the agreement(s) at any time without the prior written consent of the other party, which it may withhold in such other party’s sole discretion. Prior to making any such permitted use, each party shall provide for the other party’s review and approval, any publicity materials. Any and all goodwill from use of IPC’s name, logo, or indicia will inure to IPC’s sole and exclusive benefit.

7.9. COMMISSION APPROVAL

Execution of an agreement will ultimately be subject to approval by the Commissions.

8. ENTIRE RFP

This RFP and all exhibits, attachments, datasheets, forms, and addenda within the Portal event are incorporated herein by this reference and represent the final expression of this RFP. Only information supplied by IPC in writing through the parties listed herein or by this reference made in the submittal of this RFP shall be used as the basis for the preparation of Bidders bids.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit C

Bid Eligibility Screening

June 10, 2024

Bid Eligibility Screening
Idaho Power Company 2028 All Source RFP

Color Code:

Bidder to fill
Autofill

Bidder:

--

Bid (Portfolio) ID	
Resource ID	
Facility Name	
Resource Type	
Structure	
Ownership	
Contract Term (Years)	
Contract Capacity (MWac)	
COD / Contract Start Date	
Existing or New?	
Point of Delivery	
County, State	
Contingent on IPC transmission rights?	

Yes	Minimum criteria met
No	Bid not eligible
	Not applicable

Bid Eligibility Factor

NO.	Bid Eligibility Submittal Completeness - Bidder completed each of the following items accurately and in a manner consistent with the RFP requirements.	Name of Supporting Document(s)	Comments	Response 1	Response 2
1	Resource Based Proposal - Bid is submitted on or before the submittal deadline and all applicable forms have been completed and submitted. [Resource Based Non-Pricing] and the applicable [PPA-BSA Inputs], [BTA Inputs] and [MWh Inputs] tabs Counterparty Financial Questionnaire (Exhibit L) Draft Form Letter of Credit (Exhibit M) Bid narrative in accordance with the Bid Format and Requirements (Exhibit N) Hourly Renewable Production Template (Exhibit Q)			Please Select	Please Select
2	Resource Based Proposal - Proposal will be delivered to a Point of Delivery on IPC's transmission system OR if the Proposal will be interconnected to a third-party transmission system, Bidder has provided documentation that demonstrates it has submitted applicable transmission service requests to the relevant Transmission Provider to establish transmission rights to deliver to IPC point of delivery.			Please Select	Please Select
3	Resource Based Proposal - Bidder has provided redlines or confirmed no redlines to Draft Form Agreements for the Resource Based Proposal (Exhibit F).			Please Select	Please Select
4	Resource Based Proposal - Bidder has provided redlines or confirmed no redlines to applicable Technical Specifications (Exhibit G, H, I, and J) are required (or this is not applicable as the Proposal is a PPA/BSA).			Please Select	Please Select
5	Evidence of wire transfer provided prior to bid deadline in the correct amount for the correct number of bids.			Please Select	Please Select
6	Resource Based Proposal - Evidence that the Bidder's proposal has a Generator Interconnection Agreement OR Generator Interconnection application in either the IPC Serial Study Process or the Transitional Cluster Study Process OR for a resource not connected to IPC documentation that supports progress towards the COD with the applicable transmission owner.			Please Select	Please Select
7	Resource Based Proposal - Bidder has provided a Development Schedule identifying the timeline and schedule including contract execution, full notice to proceed, and major engineer, procure, and construct milestones to ensure delivery at the proposed commercial operation date. The Development Schedule shall include, in addition to the timeline and major milestones, a description of risks, their influence on the project's critical path, and any mitigation strategies.			Please Select	Please Select
8	Documentation submitted indicates the viability of a Commercial Operation Date (Resource Based Proposals) or Contract Effective Date (Market Purchase Proposals) that matches the COD submitted. Documentation may include, as applicable, GIA status and timely interconnection capability; federal, state, and local permitting requirements and decisions; land-use and site control requirements and decisions; construction plans and schedules; procurement documentation; financing capability and sources; and other relevant documentation necessary to demonstrate timely viability of the project. Bidder must provide details of public and community outreach (tactics, audience, goals, etc.) at a local level to identify the viability of a project's success. Idaho Power may utilize local knowledge and experience to gauge relative outreach when scoring. Idaho Power will also consider (and bidder must identify) pending, actual, or threatened administrative, legal, legislative, procedural, and other actions (federal, state, or local) that could impact timely viability.			Please Select	Please Select
9	Market Purchase Proposal - Bid is submitted on or before the submittal deadline and all applicable forms have been completed and submitted. [Market Purchase Non-Pricing] and [Market Purchase Pricing] tabs Counterparty Financial Questionnaire (Exhibit N) Bid narrative in accordance with the Bid Format and Requirements (Exhibit P)			Please Select	Please Select
10	Market Purchase Proposal - Bid of firm energy and capacity (prefer WSPP Agreement Schedule C or equivalent) meeting Western Resource Adequacy Program (WRAP) resource specificity, transmission and other requirements.			Please Select	Please Select
11	Market Purchase Proposal - The minimum WRAP Qualified Capacity Contribution (Exhibit E) requirement is met.			Please Select	Please Select

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit D

Resourced Based Non-Pricing Scoring Sheet

June 10, 2024

3	<p>Permits (15%) Bidder must provide sufficient documentation, including due diligence that applicable federal, state, and local permits for the site and ancillary facilities will be complete by the planned date, which supports the project development schedule and target commercial operation date.</p>	<p>Red - Documentation (or lack thereof) indicates that Bidder has not sufficiently engaged with the appropriate agencies or conducted due diligence or the results of environmental studies reflect a significantly extended timeline.</p> <p>Yellow - Documentation indicates that Bidder has conducted environmental studies and due diligence and the results reflect a reasonable timeline to meet the commercial operation date.</p> <p>Green - Documentation indicates that the results of environmental studies and due diligence present expedient timelines and very little risk.</p>			Please Select	Please Select	Please Select	Please Select
4	<p>GIA (15%) Bidder must provide sufficient documentation that preliminary studies have been provided by the Transmission Provider with a schedule and cost estimate for all upgrades that supports the commercial operation date.</p>	<p>Red - Documentation (or lack thereof) indicates that Generation Interconnection application has not been submitted to the Transmission Provider OR the schedule provided in the studies do not support the commercial operation date.</p> <p>Yellow - Documentation indicates that Generation Interconnection application has been submitted and/or preliminary studies have been provided by the Transmission Provider with a schedule and cost estimate for all upgrades that support the commercial operation date.</p> <p>Green - Documentation indicates that Generation Interconnect Agreement has been executed with a schedule and cost estimate specified for all upgrades that support the commercial operation date.</p>			Please Select	Please Select	Please Select	Please Select
5	<p>NRIS/ERIS (5%) Bidder must provide sufficient documentation that Network Resource Interconnection Service (NRIS) has been assessed.</p>	<p>Red - Documentation (or lack thereof) indicates that interconnection request is for Energy Resource Interconnect Service (ERIS) only.</p> <p>Yellow - Documentation indicates that interconnection request is for Network Resource Interconnect Service (NRIS) but no interconnection studies are provided or available.</p> <p>Green - Documentation indicates that Interconnection studies are provided, and include an assessment of Network Resource Interconnect Service (NRIS).</p>			Please Select	Please Select	Please Select	Please Select
6	<p>Experience (5%) Bidder must provide sufficient documentation that Bidder has sufficient experience with developing, constructing and/or operating the same technology as being proposed.</p>	<p>Red - Documentation (or lack thereof) indicates no documented experience.</p> <p>Yellow - Documentation indicates that Experience includes development (but not commercial operation) of facilities of at least 50% of the nameplate capacity.</p> <p>Green - Documentation indicates that Experience includes facilities greater than 50% of the nameplate capacity and has successfully brought projects online.</p>			Please Select	Please Select	Please Select	Please Select
7	<p>Safety (5%) Bidder must provide sufficient documentation that with regards to safety, bidder represents it has a total recordable incident (TRI) level lower than or equal to the TRI for their industry as determined by the U.S. Occupational Health and Safety Administration (OSHA).</p>	<p>Red - Documentation (or lack thereof) indicates TRI level worse than this standard OR has no Safety Standards OR has not provided adequate documentation.</p> <p>Green - Documentation indicates a TRI level equal to or better than this standard and the Safety Standard is consistent with industry expectations and applicable to contractors.</p>			Please Select	Please Select	Please Select	Please Select
8	<p>Financing (5%) Bidder must provide sufficient documentation that Bidder has a Financing Plan that demonstrates ability to finance project construction and/or ongoing operations.</p>	<p>Red - Documentation (or lack thereof) indicates no financing plan is in place.</p> <p>Green - Documentation indicates that Bidder has a Financing Plan that demonstrates ability to finance project construction and/or ongoing operations.</p>			Please Select	Please Select	Please Select	Please Select

9	<p>Development Schedule (15%) Bidder must provide sufficient documentation that the schedule includes development and construction milestones (major equipment procurement and delivery on site, EPC execution and notice to proceed, interconnection backfeed, mechanical completion) which support the commercial operations date (including consideration for RFP evaluation, contract negotiation, regulatory approvals, etc). In addition, the Development Schedule shall include, in addition to the timeline and major milestones, a description of risks, their influence on the project's critical path, and any mitigation strategies.</p>	<p>Red - Documentation (or lack thereof) indicates that the milestones do not support the commercial operation date <i>or that the risks are not reasonably mitigated.</i></p> <p>Green - Documentation indicates that the milestones do support the commercial operation date.</p> <p>Not Applicable - this is not applicable for operating assets</p>			Please Select	Please Select	Please Select	Please Select
10	<p>Existing Conditions (10%) Bidder must provide sufficient documentation that for proposed projects involving existing assets, the facility condition does not require capital improvements or repairs to ensure operations and reliability for the term identified in the bid.</p>	<p>Red - Documentation (or lack thereof) indicates that the facility will require several significant capital improvements or repairs.</p> <p>Yellow - Documentation indicates that the facility will require some significant capital improvements or repairs.</p> <p>Green - Documentation indicates that the facility will require no significant capital improvements or repairs.</p> <p>Not Applicable - this is not applicable for new assets</p>			Please Select	Please Select	Please Select	Please Select

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit E

Proposed Market Purchase Volumes

June 10, 2024

Idaho Power 2028 All Source RFP
Exhibit E - Proposed Market Purchase Volumes

Background

This document summarizes the associated market purchase procurement strategy and volumes Idaho Power is seeking to be imported on transmission capacity and rights held by Idaho Power. Market purchases will be evaluated against other resource submittals to the 2028 All-Source Request for Proposals (2028 RFP) as part of an overall resource procurement process and scored and modeled as defined in the 2028 RFP; however, this Exhibit E focuses exclusively on market purchases.

Proposed Market Purchase Volumes

Idaho Power is seeking energy purchases to serve load in varying monthly amounts [beginning in ~~for the years~~ 2028](#). Idaho Power is interested in offers with terms of up to 10 years, but the focus is on at least the first three years (2028-2031).

The identified needs and requested volumes have been determined based on the quantity of energy purchases required to economically serve load according to analysis from the 2023 IRP. The transmission capacity that Idaho Power has available for importing energy is shown in Table 1 below.

In this 2028 RFP, Idaho Power is not seeking 100 percent of the identified purchase need. Rather, the 2028 RFP seeks a portion of the total volumes that will be needed. This approach is intended to result in the acquisition of a base volume of energy that is forecasted to be necessary to serve load. Additional purchases will be necessary to supplement firm base volumes to serve load in many hours throughout the years. These additional purchases will be made closer in time to the operating season. This approach ensures that Idaho Power incrementally acquires energy that will be necessary to serve load in a timely and cost-effective manner, while not purchasing more than will be necessary. This approach will also allow Idaho Power to make additional procurement decisions as the Company moves forward in time, considering updated information and the most recent IRP available at that time.

Phasing the purchase activity over multiple years and procurement processes will ensure that Idaho Power is right-sizing its resource acquisition volumes based on current information. Phasing the purchases will also ensure that Idaho Power timely builds the purchase and resource portfolio needed to reliably serve its customers.

Requested Energy Volumes

Idaho Power is requesting proposals for energy volumes based on a percentage of the peak hour purchases identified as economic by the model Idaho Power uses for long-term capacity expansion planning, the AURORA model, for the preferred portfolio from the 2023 IRP. The AURORA model provides a total hourly economic purchase volume. Those volumes reflect all the purchases AURORA identified as economic. While the hourly economic purchase volumes identified in AURORA can be as high as over 1,000 MW in some hours, Idaho Power is not seeking to fill all those amounts now. Idaho Power is seeking bids for a minimum of 100 MW of energy for the months of June – September and November – February, and will consider bids for heavy

Idaho Power 2028 All Source RFP
Exhibit E - Proposed Market Purchase Volumes

load hours, light load hours, or other hourly blocks (including all hours).¹ Idaho Power will evaluate the bids received considering the most recent load and resource information available at the time.

Requested Energy Attributes

Idaho Power is seeking these volumes as firm energy. Idaho Power prefers offers of WSPP Agreement Schedule C or equivalent firm energy/capacity, but will consider offers of other products such as WSPP Schedule B. For the Market Purchase Proposals, the bid volume reflects the minimum Qualified Capacity Contribution that Idaho Power is seeking, as that term is defined by the WRAP. Bid-in energy or products must meet WRAP eligibility requirements. Idaho Power anticipates it will designate purchased energy as a Network Resource under the Open Access Transmission Tariff and will evaluate bids accordingly.

Idaho Power prefers bids with optionality to not take the energy if Idaho Power determines it is not needed on particular days within the month. Idaho Power will consider various proposals for the optionality including potential limits on the optionality to reach the most economical total cost of the energy product.

Idaho Power will consider bids with varying structures, including but not limited to multi-month or seasonal volume structures for Summer or Winter,² if such structures facilitate more competitive bids. Multi-month or seasonal bids may include optionality to not take the energy on days when it is not needed. Idaho Power will consider proposals for standard heavy load or light load hour products or proposals that include the ability to shape the energy into particular hours of the day.

Idaho Power's greatest need at this time is in the first three years (2028-2031). Bidders may submit proposals for any period of time greater than a month in the requested time period. For example, bidders may bid on a month or multiple months, or for a season assuming the optionality described above, and for one or more years.

With respect to pricing, Idaho Power prefers index or index plus adder-based pricing, but will consider other pricing structures. Pricing should not include costs associated with regulatory structures not applicable in Idaho or Oregon, and should be based on product being sunk in Idaho or Oregon.

With respect to the form of agreement, Idaho Power prefers to use a confirmation under a mutually-agreeable master agreement (such as the WSPP Agreement) but will consider proposals for other agreement forms.

¹ Heavy load hours (HLH or on-peak) means all hours in the peak period hour ending 0700 through 2200, Monday through Saturday, excluding North American Electric Reliability Corporation (NERC) holidays. Light load hours (LLH or off-peak) means all hours that are not on-peak hours – generally all hours in the peak period hour ending 2300 through 0600, Monday through Saturday, and all day on Sundays and NERC holidays.

² Summer: June – September and Winter: November – February.

**Idaho Power 2028 All Source RFP
Exhibit E - Proposed Market Purchase Volumes**

Eligible Delivery Points

Bids must provide for delivery to Idaho Power at its border or at one of the points listed in Table 1 below, or to the Idaho Power Border (Walla Walla, Lolo, SMLK, HURR, LaGrande, M345, Jeff, Brady, Bora). The capacity available at the Idaho Power Border varies by point.³ Idaho Power will consider the impact to and use of available transmission capacity in its evaluation.

Bids may also be delivered to one or more of the points listed in Table 4 below. The table below indicates firm transmission capacity rights Idaho Power has available for imports of energy to its system. Idaho Power will consider the impact to and use of available transmission capacity in its evaluation. Idaho Power will include the costs it incurs under the transmission provider’s Open Access Transmission Tariff for use of the capacity listed below in its evaluation of bids delivered to these points and relying on such capacity.

Actual final Delivery Points for any final shortlisted Bids will be subject to negotiation by the parties based on updated information at the time. [The available capacity listed below is indicative as of the date of the RFP and is subject to change.](#)

Table 1: Available Transmission Capacity for Imports to Idaho Power’s System by Points of Delivery.

Point of Delivery	Import Capability
MIDC	Up to 100 MW ⁴
MIDCREMOTE	Up to 3 500 MW ⁵
AVA.BPAT	Up to 100 MW ⁶
McNary	Up to 80 MW ⁷
LaGrande	Up to 50 MW ⁸
Mona/Four Corners	Up to 200 MW available between the two points ⁹
RedButte	Up to 50 MW, June-October only ¹⁰

³ The Idaho Power Transmission Provider determines what capacity is available on Idaho Power’s transmission system for Idaho Power load service on an annual basis. Any resources or energy procured under the 2028 RFP would be included in Idaho Power’s load and resource forecast and included in transmission evaluations as of Idaho Power’s ownership or purchase of the resource or energy.

⁴ Available through April 30, 2026, with the potential to extend beyond that date if renewed by Idaho Power Load Serving Operations, such renewal being subject to the Transmission Provider’s ability to continue to offer the service.

⁵ Contingent on B2H being in service.

⁶ Available through April 30, 2027, with the potential to extend beyond that date if renewed by Idaho Power Load Serving Operations.

⁷ Available through December 31, 2027, with the potential to extend beyond that date if renewed by Idaho Power Load Serving Operations.

⁸ Available through December 31, 2026, with the potential to extend beyond that date if renewed by Idaho Power Load Serving Operations.

⁹ Contingent on PacifiCorp / Idaho Power asset swap associated with B2H. The Mona and Four Corners points of delivery, in aggregate, may not exceed 200 MW.

¹⁰ Available through May 31, 2029, with the potential to extend beyond that date if renewed by Idaho Power Load Serving Operations.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit O

Levelized PVRR Scenarios

June 10, 2024

Idaho Power 2028 All Source RFP
Exhibit O - Levelized PVRR Scenarios

Exhibit O provides example annual revenue requirements for resources of varying time periods and how the annual revenue requirement drives the Present Value of the Revenue Requirement, the levelized payment, and levelized cost of capacity or energy as would be utilized in the evaluation process.

2028 RFP - Levelized Present Value of the Revenue Requirement Scenarios

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	PPA (w/ 2% esc.)	BTA (20 year life)	Self Build (20 year life)	PPA (w/ 2% esc.)	BTA (35 year life)	Self Build (35 year life)
1	\$6,000,000	\$17,621,044	\$17,621,044	\$8,000,000	\$16,296,611	\$16,296,611
2	\$6,120,000	\$11,865,378	\$11,865,378	\$8,160,000	\$10,702,669	\$10,702,669
3	\$6,242,400	\$11,585,370	\$11,585,370	\$8,323,200	\$10,584,384	\$10,584,384
4	\$6,367,248	\$11,283,333	\$11,283,333	\$8,489,664	\$10,444,070	\$10,444,070
5	\$6,494,593	\$10,868,975	\$10,868,975	\$8,659,457	\$10,191,436	\$10,191,436
6	\$6,624,485	\$10,351,480	\$10,351,480	\$8,832,646	\$9,835,664	\$9,835,664
7	\$6,756,975	\$10,128,765	\$10,128,765	\$9,009,299	\$9,774,672	\$9,774,672
8	\$6,892,114	\$9,992,757	\$9,992,757	\$9,189,485	\$9,800,387	\$9,800,387
9	\$7,029,956	\$9,649,646	\$9,649,646	\$9,373,275	\$9,618,999	\$9,618,999
10	\$7,170,555	\$9,307,562	\$9,307,562	\$9,560,741	\$9,438,638	\$9,438,638
11	\$7,313,967	\$8,966,536	\$8,966,536	\$9,751,955	\$9,259,335	\$9,259,335
12	\$7,460,246	\$8,626,600	\$8,626,600	\$9,946,994	\$9,081,123	\$9,081,123
13	\$7,609,451	\$8,287,786	\$8,287,786	\$10,145,934	\$8,904,032	\$8,904,032
14	\$7,761,640	\$7,950,129	\$7,950,129	\$10,348,853	\$8,728,098	\$8,728,098
15	\$7,916,873	\$7,613,663	\$7,613,663	\$10,555,830	\$8,553,355	\$8,553,355
16	\$8,075,210	\$7,278,423	\$7,278,423	\$10,766,947	\$8,379,838	\$8,379,838
17	\$8,236,714	\$6,944,447	\$6,944,447	\$10,982,286	\$8,207,585	\$8,207,585
18	\$8,401,449	\$6,611,772	\$6,611,772	\$11,201,931	\$8,036,633	\$8,036,633
19	\$8,569,477	\$6,280,437	\$6,280,437	\$11,425,970	\$7,867,022	\$7,867,022
20	\$8,740,867	\$5,950,483	\$5,950,483	\$11,654,489	\$7,698,791	\$7,698,791
21				\$11,887,579	\$7,531,982	\$7,531,982
22				\$12,125,331	\$7,366,638	\$7,366,638
23				\$12,367,837	\$7,202,803	\$7,202,803
24				\$12,615,194	\$7,040,521	\$7,040,521
25				\$12,867,498	\$6,879,840	\$6,879,840
26					\$6,720,807	\$6,720,807
27					\$6,563,472	\$6,563,472
28					\$6,407,886	\$6,407,886
29					\$6,254,102	\$6,254,102
30					\$6,102,173	\$6,102,173
31					\$5,952,155	\$5,952,155
32					\$5,804,105	\$5,804,105
33					\$5,658,083	\$5,658,083
34					\$5,514,149	\$5,514,149
35					\$5,372,365	\$5,372,365
Total	\$145,784,219	\$187,164,585	\$187,164,585	\$256,242,398	\$287,774,423	\$287,774,423
MW	50	50	50	75	75	75
MWhs	131,400			197,100	197,100	197,100
PV (with Discount Delay)	\$78,824,475	\$115,338,949	\$115,338,949	\$119,754,007	\$131,620,816	\$131,620,816
Levelized Payment	\$7,220,713	\$10,565,619	\$10,565,619	\$9,924,547	\$9,744,551	\$9,744,551
Levelized \$/kw-month	\$12.03	\$17.61	\$17.61	\$11.03	\$10.83	\$10.83
Levelized \$/MWh	\$54.95			\$50.35	\$49.44	\$49.44
Number of Years	20	20	20	25	35	35
Product Type	Solar	BESS	BESS	Solar	Solar	Solar
Escalation	2.00%					
Discount Rate	6.617%					
Discount Delay	0.50					

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit P

Benchmark Bids

REDLINED VERSION

June 10, 2024

**Idaho Power 2028 All Source RFP
Exhibit P – Benchmark Bids**

Proposed 2028 AS RFP Benchmark Bids

Idaho Power intends to submit the following ~~three-six (63)~~ individual Benchmark Bids:

No.	Bidder	Resource Type	Facility Name	Structure	Ownership	Capacity (MW)	Contract Term (Years)	COD	Existing or New	Point of Delivery	County, State	Transmission Rights Contingent as described in Exhibit E?	GIA Status
1	IPC	Battery Energy Storage (BESS)	Hemingway Storage 2	Asset Purchase	IPC	49	N/A	4/1/2028	New	Hemingway 34.5 kV Substation	Owyhee, Idaho	No	LGIA
2		Battery Energy Storage (BESS)	<u>Boise Bench Energy Storage 2</u>	<u>Asset Purchase</u>	IPC	150	N/A	4/1/2028	New	<u>Boise Bench 138 kV Substation</u>	<u>Ada, Idaho</u>	No	LGIA
23	IPC	Battery Energy Storage (BESS)	Hemingway Storage 3 <u>Kuna II BESS</u>	Asset Purchase / Battery Storage Agreement	IPC Mix	100 150	N/A 20	4/1/2028	New	Hemingway 34.5 <u>Kuna 138 kV Substation</u>	Owyhee <u>Ada, Idaho</u>	No	Transition Cluster Study
34	IPC	Battery Energy Storage (BESS)	ID1 Boise Bench Energy Storage 2	Asset Purchase / Battery Storage Agreement	IPC	150	20	4/1/2028	New	Boise Bench 138 <u>Hemingway 230 kV Substation</u>	Ada <u>Owyhee, Idaho</u>	No	LGIA
5	Solar Photovoltaic	Soles Rest Solar	<u>Asset Purchase / Power Purchase Agreement</u>	Mix	149	20	4/1/2028	New	<u>Danskin-Hubbard 230 kV Line</u>	Elmore, Idaho	No	LGIA	
6	<u>Wind & Battery Energy Storage (BESS)</u>	<u>Appaloosa</u>	<u>Asset Purchase</u>	IPC	230	N/A	4/1/2028	New	<u>Boise Bench - Midpoint #2 230 kV Line</u>	Elmore, Idaho	No	LGIA	

Deleted Cells

Deleted Cells

~~To be built on property with current or pending land rights (ownership, lease, etc) by Idaho Power or its partners.~~

Benchmark Bids will be submitted in accordance with the RFP. Benchmark Bids will be subject to the requirements, evaluation methodology and other standards specified in the RFP. The Benchmark Bid scores will be assigned using the same bid scoring and evaluation criteria that will be used to score market bids.

Idaho Power and its partners will administer a competitive supply and engineer, procure, construct solicitation(s), on a case-by-case basis, for the applicable systems required for all Benchmark Bids.

Idaho Power 2028 All Source RFP
Exhibit P – Benchmark Bids

~~Benchmark Bid efficiencies will be evaluated as submitted by the IPC Internal Team.~~

Transmission requirements, operating requirements, and dispatch requirements for Benchmark Bids will be evaluated pursuant to applicable Large Generator Interconnection Agreements and necessary Transmission Service Agreements for each resource.

The Benchmark Bids will be constructed in compliance with applicable Idaho Power technical specifications as defined in the RFP.

Operations & Maintenance costs will be evaluated consistent with the RFP over the life of the resource.

OAR 860-089-0300 requires that utilities specify what utility assets, such as transmission rights or sites, are being made available to benchmark resources and either offer those assets to third-party bidders or provide a justification for why those assets were not made available. Benchmark Bids No. 1, ~~2~~, and ~~3~~ are located on Idaho Power owned property and are intended to be incorporated into existing substations, thus these sites are only available to third-part bidders proposing a Build Transfer Agreement (Asset Purchase) based on access control and ongoing utility operations. [Benchmark Bid No. 3, 4, 5, and 6 are located on property that Idaho Power has no current rights directly and is relying on partnership site control and thus cannot offer site access as Idaho Power has no authority to do so.](#)

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit P

Benchmark Bids

CLEAN VERSION

June 10, 2024

**Idaho Power 2028 All Source RFP
Exhibit P – Benchmark Bids**

Proposed 2028 AS RFP Benchmark Bids

Idaho Power intends to submit the following three (3) individual Benchmark Bids:

No.	Resource Type	Facility Name	Structure	Ownership	Capacity (MW)	Contract Term (Years)	COD	Existing or New	Point of Delivery	County, State	Transmission Rights Contingent?	GIA Status
1	Battery Energy Storage (BESS)	Hemingway Storage 2	Asset Purchase	IPC	49	N/A	4/1/2028	New	Hemingway 34.5 kV Substation	Owyhee, Idaho	No	LGIA
2	Battery Energy Storage (BESS)	Boise Bench Energy Storage 2	Asset Purchase	IPC	150	N/A	4/1/2028	New	Boise Bench 138 kV Substation	Ada, Idaho	No	LGIA
3	Battery Energy Storage (BESS)	Kuna II BESS	Asset Purchase / Battery Storage Agreement	Mix	150	20	4/1/2028	New	Kuna 138 kV Substation	Ada, Idaho	No	Transition Cluster Study
4	Battery Energy Storage (BESS)	ID1	Asset Purchase / Battery Storage Agreement	Mix	215	20	4/1/2028	New	Hemingway 230 kV Substation	Owyhee, Idaho	No	LGIA
5	Solar Photovoltaic	Soles Rest Solar	Asset Purchase / Power Purchase Agreement	Mix	149	20	4/1/2028	New	Danskin–Hubbard 230 kV Line	Elmore, Idaho	No	LGIA
6	Wind & Battery Energy Storage (BESS)	Appaloosa	Asset Purchase	IPC	230	N/A	4/1/2028	New	Boise Bench – Midpoint #2 230 kV Line	Elmore, Idaho	No	LGIA

Benchmark Bids will be submitted in accordance with the RFP. Benchmark Bids will be subject to the requirements, evaluation methodology and other standards specified in the RFP. The Benchmark Bid scores will be assigned using the same bid scoring and evaluation criteria that will be used to score market bids.

Idaho Power and its partners will administer a competitive supply and engineer, procure, construct solicitation(s), on a case-by-case basis, for the applicable systems required for all Benchmark Bids.

Transmission requirements, operating requirements, and dispatch requirements for Benchmark Bids will be evaluated pursuant to applicable Large Generator Interconnection Agreements and necessary Transmission Service Agreements for each resource.

The Benchmark Bids will be constructed in compliance with applicable Idaho Power technical specifications as defined in the RFP.

Operations & Maintenance costs will be evaluated consistent with the RFP over the life of the resource.

OAR 860-089-0300 requires that utilities specify what utility assets, such as transmission rights or sites, are being made available to benchmark resources and either offer those assets to third-party bidders or provide a justification for why those assets were not made available. Benchmark Bids No. 1 and 2 are located on Idaho Power owned property and are intended to be incorporated into existing substations, thus these sites are only available to third-part bidders proposing a Build Transfer Agreement (Asset Purchase) based on access control and ongoing utility operations. Benchmark Bid No. 3, 4, 5, and 6 are located on property that Idaho Power has no current rights directly and is relying on partnership site control and thus cannot offer site access as Idaho Power has no authority to do so.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UM 2317

Exhibit R

Supplemental 2029 and Later Requirements

June 10, 2024

Idaho Power 2028 All Source RFP
Exhibit R – Supplemental 2029 and Later Requirements

This Exhibit R – Supplemental 2029 and Later Requirements details the purpose, proposal specifications, and bid evaluation criteria and processes for bids that cannot meet the detailed requirements of the RFP related to delivery prior to summer 2028 (“2029 and Later Bid(s)”). All aspects of the RFP are relevant to 2029 and Later Bids except for the details specifically outlined in this Exhibit R.

2. Purpose

2.2 THE SOLICITATION

IPC is issuing this Exhibit R – Supplemental 2029 and Later Requirements to the RFP to solicit formal bids that intend to be commercially operational after the summer peak 2028 and may not otherwise be eligible in conformance with the RFP. Namely, bids that require long development timelines and do not meet the Bid Eligibility Criteria outlined in Exhibit C of the RFP related to inclusion in Idaho Power’s Generation Interconnection Serial Study Process or the Transitional Cluster Study Process **ARE** eligible to submit a 2029 and Later Bid. Like products solicited for delivery by April 2028 in conformance with the RFP (“2028 Bids”), IPC is soliciting formal 2029 and Later Bids from Bidders for two types of electric energy and capacity products: Resource Based Proposals and Market Purchase Proposals. The eligible types of bids described in Section 3 of the RFP apply to the 2029 and Later Bids as well.

IPC’s annual capacity position developed to inform its 2023 IRP demonstrates that the Company will also have resource needs beyond 2028. The 2023 IRP forecasted peak load to grow by approximately 80 MW per year on average, or 1,500 MW over the next two decades due to unprecedented customer growth. While the 2028 Bids will address the 138 MW of incremental capacity needs in 2028, the 2023 IRP identifies 142 MW of incremental capacity needs in 2029, growing to a total of over 1,150 MW by 2038. Further, within the last few years, the number of unique large industrial load inquiries has increased, with many large load inquiries totaling hundreds and thousands of megawatts, which if the loads materialized, would further increase projected total demand. For example, in the 2023 IRP Idaho Power included a Large Load growth scenario that increases the identified incremental capacity needs by 200 MW more than in the base scenario referenced above.

IPC will be accepting 2029 and Later Bids for energy or capacity incremental to its system after June 1, 2028, from Resource Based Proposals and Market Purchase Proposals. In terms of peak capacity, it is necessary for IPC to balance the variability of the increased volumes of Variable Energy Resources (VER) on its system and to maintain system reliability. Idaho Power is also projecting a shift in its highest risk hours from summer to winter due to industrial load growth and is seeking capacity resources that can support winter high risk hours as well as summer high risk hours.

2.8 SCHEDULE

The key milestones for the solicitation for 2029 and Later Bids and their currently scheduled dates are provided below. The schedule may be modified accordingly to account for updated information related to a bids’ reliance on generation interconnection costs and timeline.

Milestone	Date
2029 and Later Bids Bid Definition Forms Due	10/15/2024

**Idaho Power 2028 All Source RFP
Exhibit R – Supplemental 2029 and Later Requirements**

Milestone	Date
2029 and Later Bids Bid Entry Forms Distributed to Bidders	11/1/2024
2029 and Later Bids Last Day for RFP Questions	11/15/2024
2029 and Later Bids Benchmark Bids Due	12/1/2024
IPC submit 2029 and Later Bids Benchmark Bids scores to IE	12/31/2024
IE submit 2029 and Later Bids Benchmark Bids report	1/15/2025
2029 and Later Bids RFP Bids Due	1/15/2025
2029 and Later Bids Open RFP Bids	1/16/2025
2029 and Later Bids Bid Eligibility Screening complete and scores to IE	2/5/2025
IE files 2029 and Later Bids report on Bid Eligibility	2/20/2025
2029 and Later Bids IPC completes Non-Price & Price Scoring and prepares Initial Shortlist and submits to IE (without sensitivities)	3/10/2025
IE files 2029 and Later Bids report on Initial Shortlist	3/31/2025
2029 and Later Bids Bidders Notified of Initial Shortlist	4/1/2025
2029 and Later Bids Bidders provide updates to bid if applicable	4/15/2025
Idaho Power provides 2029 and Later Bids Final Shortlist and supporting workpapers to IE and Staff (with sensitivities)	5/31/2025

3. Proposal Specifications

3.1 ELIGIBLE PROPOSALS

Table 3-1 – Resource Based Proposal Scope Summary is modified as follows to allow bids that confirm projects where the First Delivery is after June 1, 2028.

Table 0-1 – Resource Based Proposal Scope Summary

Scope Item	Description
First Delivery	After June 1, 2028
Resource Status	Existing (not contracted to deliver to IPC as of the proposed COD) or for new resources, no requirement to be in either the Idaho Power Serial Study Process, Transitional Cluster Study Process, or Large Generation Interconnection Process.

4. Resource Based Proposal: Additional Specifications and Instructions

4.1 MINIMUM REQUIREMENTS

IPC has specified minimum requirements for participating 2029 and Later Bids (the Minimum Requirements) for Resource Based Proposals. These requirements are listed below and in EXHIBIT C – 2029 and Later Bids - Bid Eligibility Checklist. Note that all factors are the same as the 2028 Bids except for the removal of factor No. 6.

Bid Eligibility Factor

NO.	Bid Eligibility Submittal Completeness - Bidder completed each of the following items accurately and in a manner consistent with the RFP requirements.
1	<p>Resource Based Proposal - Bid is submitted on or before the submittal deadline and all applicable forms have been completed and submitted.</p> <p>[Resource Based Non-Pricing] and the applicable [PPA-BSA Inputs], [BTA Inputs] and [MWh Inputs] tabs</p> <p>Counterparty Financial Questionnaire (Exhibit L)</p> <p>Draft Form Letter of Credit (Exhibit M)</p> <p>Bid narrative in accordance with the Bid Format and Requirements (Exhibit N)</p> <p>Hourly Renewable Production Template (Exhibit Q)</p>
2	<p>Resource Based Proposal - Proposal will be delivered to a Point of Delivery on IPC's transmission system OR if the Proposal will be interconnected to a third-party transmission system, Bidder has provided documentation that demonstrates it has submitted applicable transmission service requests to the relevant Transmission Provider to establish transmission rights to deliver to IPC point of delivery.</p>
3	<p>Resource Based Proposal - Bidder has provided redlines or confirmed no redlines to Draft Form Agreements for the Resource Based Proposal (Exhibit F).</p>
4	<p>Resource Based Proposal - Bidder has provided redlines or confirmed no redlines to applicable Technical Specifications (Exhibit G, H, I, and J) are required (or this is not applicable as the Proposal is a PPA/BSA).</p>
5	<p>Evidence of wire transfer provided prior to bid deadline in the correct amount for the correct number of bids.</p>
6	<p>Resource Based Proposal - Evidence that the Bidder's proposal has a Generator Interconnection Agreement OR Generator Interconnection application in either the IPC Serial Study Process or the Transitional Cluster Study Process OR for a resource not connected to IPC documentation that supports progress towards the COD with the applicable transmission owner.</p>

Idaho Power 2028 All Source RFP
Exhibit R – Supplemental 2029 and Later Requirements

7	<p>Resource Based Proposal - Bidder has provided a Development Schedule identifying the timeline and schedule including contract execution, full notice to proceed, and major engineer, procure, and construct milestones to ensure delivery at the proposed commercial operation date. The Development Schedule shall include, in addition to the timeline and major milestones, a description of risks, their influence on the project's critical path, and any mitigation strategies.</p>
8	<p>Documentation submitted indicates the viability of a Commercial Operation Date (Resource Based Proposals) or Contract Effective Date (Market Purchase Proposals) that matches the COD submitted.</p> <p>Documentation may include, as applicable, GIA status and timely interconnection capability; federal, state, and local permitting requirements and decisions; land-use and site control requirements and decisions; construction plans and schedules; procurement documentation; financing capability and sources; and other relevant documentation necessary to demonstrate timely viability of the project.</p> <p>Bidder must provide details of public and community outreach (tactics, audience, goals, etc.) at a local level to identify the viability of a project's success. Idaho Power may utilize local knowledge and experience to gauge relative outreach when scoring.</p> <p>Idaho Power will also consider (and bidder must identify) pending, actual, or threatened administrative, legal, legislative, procedural, and other actions (federal, state, or local) that could impact timely viability.</p>
9	<p>Market Purchase Proposal - Bid is submitted on or before the submittal deadline and all applicable forms have been completed and submitted.</p> <p>[Market Purchase Non-Pricing] and [Market Purchase Pricing] tabs Counterparty Financial Questionnaire (Exhibit N) Bid narrative in accordance with the Bid Format and Requirements (Exhibit P)</p>
10	<p>Market Purchase Proposal - Bid of firm energy and capacity (prefer WSPP Agreement Schedule C or equivalent) meeting Western Resource Adequacy Program (WRAP) resource specificity, transmission and other requirements.</p>
11	<p>Market Purchase Proposal - The minimum WRAP Qualified Capacity Contribution (Exhibit E) requirement is met.</p>

4.4 INTERCONNECTION STUDIES AND COST ESTIMATING

Bidder is responsible for understanding the [IPC Generator Interconnection Processes](#) or other Transmission Providers — including surplus interconnection service — considering the durations and costs of those processes in its bids, and successfully executing those processes to achieve coordination with IPC and delivery of the proposed resources to IPC on or before the dates identified in its bid. A Bidder proposing to interconnect a resource on to IPC’s system must demonstrate that all known incremental costs to deliver energy from the resource to IPC’s load have been included in the bid (including the interconnection facility types and cost estimates defined below). A Bidder proposing to

Idaho Power 2028 All Source RFP
Exhibit R – Supplemental 2029 and Later Requirements

interconnect to another Transmission Provider's system must demonstrate that it has submitted a GI request and any required transmission service request(s) to the relevant Transmission Providers and that it is meeting the requirements of those processes or demonstrate that applicable arrangements to interconnect can be accommodated to meet the proposed COD.

IPC has an updated [IPC Generator Interconnection Processes](#) that should be considered when responding to this RFP.