



Oregon

Tina Kotek, Governor

January 24, 2025

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OREGON PUBLIC UTILITY COMMISSION ATTENTION: FILING CENTER
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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.

Attached are Staff Comments on Final Shortlist:
UM 2317 Staff FSL Comments REDACTED.pdf

One confidential exhibit is included with this filing:
UM 2317 Staff FSL Comments CONFIDENTIAL.pdf

/s/ Mark Brown

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CERTIFICATE OF SERVICE

UM 2317

I certify that this day I served the foregoing document upon all the following parties or attorneys of parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid or by electronic mail pursuant to OAR 860-001-0180 (which may include a link to a secure shared file service).

Dated this 24th day of January 2025 at Salem, Oregon



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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

Docket No. UM 2317

In the Matter of
IDAHO POWER CORPORATION,
2028 All Source Request for Proposals (RFP).

Staff Comments

The following are initial comments from the Public Utility Commission Staff (Staff) on Idaho Power Company's (IPC or Company) Request for Acknowledgment of the Final Shortlist (FSL) in IPC's 2028 All-Source Request for Proposals (RFP). Idaho Power filed its request for acknowledgment on January 10, 2025.¹ The Independent Evaluator's (IE) Closing Report was included as confidential attachment to the filing.²

Staff includes 13 *Requests* to the Company, which are summarized at the end of the document. Four issues mainly concern Staff: (1) The explanation of what the Company learned through scenario and sensitivity analyses and how that information has been used to generate the final shortlist (FSL). (2) The clarity as to how the Company will conduct contract negotiations, including the size of the procurement. (3) Non-benchmark utility-owned bids have not yet been evaluated for unique risks. (4) The intent of the RFP design of comparing the benefits of resources with different delivery dates has not been fully realized. Table 1 shows the final ranked shortlist. In the following, Staff discusses how the Company constructed it, from the procurement drivers and size, over the development of the FSL and overlapping timelines, to compliance with rules and orders.

Table 1: Final Ranked Shortlist

Project	Owner	Technology	Ownership	Delivery Year
[BEGIN CONFIDENTIAL]	[BEGIN CONFIDENTIAL]	330 MW solar	BTA	2028
[REDACTED]	[REDACTED]	80 MW solar	PPA	2028
[REDACTED]	[REDACTED]	149 MW solar	PPA	2028

¹ Docket No. UM 2317, [Idaho Power Company's Request for Acknowledgement](#), January 10, 2025.

² Docket No. UM 2317, London Economics International, [Closing Report](#), January 15, 2025.

Project	Owner	Technology	Ownership	Delivery Year
[REDACTED]	[REDACTED]	178.6 MW wind	Benchmark/Asset Purchase	2028
[REDACTED]	[REDACTED]	400 MW solar	PPA	2028
[REDACTED]	[REDACTED]	150 MW BESS	BTA	2028
[REDACTED]	[REDACTED]	100 MW BESS	BSA	2028
[REDACTED] [END CONFIDENTIAL]	[REDACTED] [END CONFIDENTIAL]	100 MW gas/H2 plus 110 MW BESS	BTA/BSA	2028

Procurement Drivers and Size

On August 16, the Commission approved the draft of IPC’s All-Source RFP together with the Company’s Scoring and Modeling Methodology.³ IPC issued the 2028 RFP on August 16, 2024, with bids being due on September 17, 2024, for bids that meet the Generator Interconnection Agreement (GIA) requirements (Group 1).⁴ Bids that do not meet the GIA requirements and have a commercial operations date (COD) after April 1, 2028, can be submitted until January 27, 2025, and will be evaluated in a second round of this RFP. IPC’s 2023 Integrated Resource Plan (IRP) identifies an incremental capacity shortfall of 138 MW in 2028, 142 MW in 2029, and 369 MW in 2030, with the preferred portfolio adding 555 MW in 2028 (400 MW wind, 150 MW solar, 5 MW BESS), 405 MW in 2029 (400 MW wind, 5 MW BESS), and 1105 MW in 2030 (350 MW gas, 100 MW wind, 500 MW solar, 155 MW BESS).⁵ The large load scenario (simulating a new load of 200 MW) requires 400 more MW over these three years. In line with the IRP, the Company seeks a minimum of 138 MW of incremental peak capacity and 555 MW of supply-side resource additions in this RFP. Incremental peak capacity refers to theoretical firm capacity needs, while supply-side resource additions are the necessary nameplate capacity, given effective load-carrying capability (ELCC). IPC states that the RFP is further driven by new large loads that are likely to materialize.⁶

Regardless of potential new load, the Company does not discuss how the planned 2026 and 2027 resource additions from previously completed RFP are affecting incremental needs detailed above. The acknowledged near-term action plan includes up to

³ Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024.
⁴ The Generator Interconnection Agreement (GIA) requirements for Group 1 are that projects are part of either the Idaho Power Generator Interconnection Serial Study Process or the Transitional Cluster Study Process, see 7.2 of the RFP.
⁵ Idaho Power Company, [Integrated Resource Plan](#), September 2023, p. 174, p.146.
⁶ Docket No. UM 2317, [Idaho Power Company’s Request for Acknowledgement](#), January 10, 2025, p. 3.

1,696 MW of new resources including the Valmy 1 & 2 conversion between 2026 and 2028; the Company plans to already add [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in 2026 and 2027.⁷

Staff believes the stated resource needs (“a minimum of”) are somewhat vague and the request for acknowledgement would benefit from a clearer description of the number of resources the Company is planning to acquire and under which conditions, like a specific new load, for example. As directed in LC 84, UM 2255, and UM 2317, “the Company should use its best judgement when selecting a final procurement volume from the RFP.” If the Company decides to pursue a higher volume of projects, any such procurement beyond the scope of the most recently acknowledged IRP must be informed by a report by the Company detailing the reasons for such a decision.⁸ As addressed in Scoring and Modeling Methodology Condition 1, IPC proposes to procure more than justified by its most recently acknowledged IRP, and must therefore document changes to its need.⁹ Staff’s intention is “to ensure that IPC does not over-procure bids with 2028 CODs in order to meet a capacity deficit that may not materialize,” because that may open the door to utility bias if such a need is cited as justification to procure utility-owned assets, as argued by the Northwest & Intermountain Power Producers Coalition (NIPPC).¹⁰ Staff elaborates further on *Request 1* in *Requests 4* and *9*.

Request 1: In Reply Comments, IPC should detail the reasons for significant volume changes in its procurement strategy, including changes to ELCC values.

Final Shortlist

Methodology

The Company developed its FSL in accordance with the Commission-approved Scoring and Modeling Methodology, using six steps:

- (1) Bids were screened for eligibility based on minimum requirements.
- (2) An initial ranked shortlist (ISL) was created based on price and non-price score. Only eligible bids above a certain price score were included on the initial shortlist, with at least three projects for each technology if available.
- (3) After updates to bids including third-party review of wind and solar performance factors, the initial shortlist was made available for selection by the Long-Term Capacity Expansion (LTCE) model implemented in AURORA. Eight scenarios,

⁷ 200 MW of 1,756 MW are still under negotiations. Docket No. UM 2317, [Idaho Power Company’s Request for Acknowledgement](#), Attachment 2, January 10, 2025, p. 3.

⁸ Docket No. UM 2255, [Order No. 24-055](#), Appendix A, February 22, 2024, p. 10.

⁹ Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024, Appendix A, p. 10.

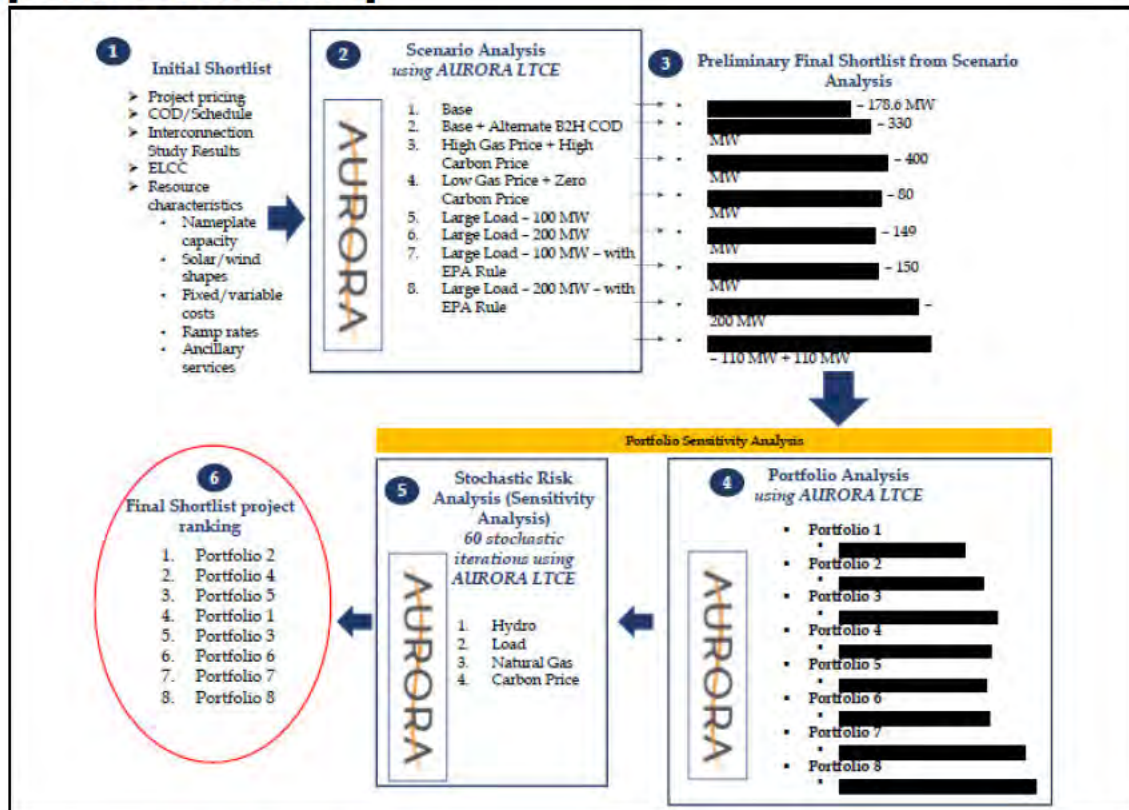
¹⁰ Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024, Appendix A, p. 9.

derived from 2023 IRP scenarios, were run in AURORA.

- (4) A preliminary shortlist was created including any project picked in any of the eight scenarios.
 - (5) IPC created eight unique portfolios that each included only existing resources plus one of the resources picked in the previous step. The net-present value (NPV) of each portfolio was calculated under 60 stochastic conditions, varying hydro generation, load, natural gas price, and carbon price (sensitivity analysis).
 - (6) The eight resources included in the preliminary shortlist were ranked for the final shortlist according to the lowest mean net-present value from the previous step.
- Figure 1 illustrates this process.

Figure 1: Final Shortlist Process

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

Benchmark Bid Advantage and Unique Risks

Four benchmark bids including two BESS projects [BEGIN CONFIDENTIAL] [END CONFIDENTIAL], one wind project [BEGIN CONFIDENTIAL] [END CONFIDENTIAL], and one hybrid

wind/BESS project [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] were evaluated prior to opening other bids. The IE identified three unique risks of the proposed benchmark bids, in particular, construction cost overruns, additional capital costs, and decommissioning costs.¹¹

The IE confirmed the eligibility of all four benchmark bids. IPC and the IE agreed on the non-price score for all but one benchmark bid. For [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], which did not make the final shortlist, the IE subtracted 2.5 points because not all permits had been submitted. As required, the IE evaluated unique risks and advantages of benchmark bids, including construction costs, forced outage rates, reasonableness of any proposal or absence of a proposal to offer electric company-owned or benchmark resource elements to third-party bidders, end effect values, environmental emissions costs, operation and maintenance costs, capital addition costs, performance assumptions, and construction schedules.

For the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], the IE noted a concern that “the build-transfer agreement lacks some provisions to either mitigate construction cost overruns or allocate cost savings.”¹² Additionally, the project does not include any additional capital or decommissioning costs. Staff is unsure whether the Force Outage Rate (FOR) of 0 percent, assumed by IPC, is reasonable. The IE explained that the FOR is largely immaterial because energy benefits are derived from the hourly energy output curve. Hendrickson Renewables reviewed the forecasted energy output and in fact increased availability by 0.5 percent.¹³ Nonetheless, Staff would like the Company to explain why it believes a FOR of 0 is reasonable. The [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] shares the same issues augmented by potential tariff increases. In addition, the long-term service agreement for the BESS lacks detailed information and excludes auxiliary power, property taxes, and insurance.

For the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], the IE identified as concerns a lack of detail in construction costs, making it impossible to ascertain the risk of cost overruns, the exclusion of decommissioning costs, a lacking discussion of additional capital costs, as well as missing augmentation costs. Although, the system capacity is overbuilt to account for two years of battery degradation from usage.

For [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], the IE notes that the price quote has expired and decommissioning costs are not included. Additionally, the IE finds Fixed Operations & Maintenance costs too low

¹¹ London Economics International, Confidential Review of the Idaho Power Company’s Benchmark Bids in the 2028 All-Source RFP, September 16, 2024.

¹² Sayad Moudachirou et al., Review of the Idaho Power Company’s Benchmark Bids, September 16, 2024, p. 15.

¹³ Hendrickson Renewables, Confidential Energy Production Estimate Reviews for the Idaho Power 2028 All-Source RFP, December 3, 2024.

because it excludes costs associated with installing augmentation components, extended warranty, and preventative maintenance.

The IE Closing Report does not discuss the unique risks associated with utility-ownership of bids that were not benchmarks, including [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]. The IE will submit a supplemental report analyzing these issues, at which point Staff will evaluate further. In the meantime, the Company is not required but free to address any unique risks with utility-ownership of bids in its reply comments.

Request 2: In Reply Comments, IPC should address the concerns outlined by the IE in its benchmark bid report, including construction cost overruns, additional capital costs, and decommissioning costs for any benchmark bid included in the FSL. In addition, IPC should explain the 0 percent FOR for the wind project.

Initial Shortlist

The initial shortlist ranks all eligible bids by score (price + non-price) in seven technology categories. The Company used a large step increase in total score as a natural cutoff point to eliminate about half of the eligible bids. 95 resource-based, and no market-based proposals were submitted, spanning various resource types and ownership structure. Table 2 below shows proposals by resource type.

Table 2: Proposals by Resource Type

Resource Type	Number of Proposals
Wind	2
Wind plus Battery Energy Storage System (BESS)	1
Solar	35
Solar plus BESS	39
BESS	15
Gas/H2 plus BESS	1
Solar plus Wind plus BESS	1
Energy plus BESS	1
Total	95

IPC and the IE agreed on a list of 88 eligible bids from 19 companies, with only seven bids being declared ineligible. Four proposals by [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] lacked evidence of meeting the GIA requirement but could be submitted to Group 2 of the RFP. Three proposals by [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] were unable to demonstrate delivery to a delivery point specified in Exhibit E of the RFP. Bids by [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] were initially excluded, but later added after LEI challenged the

necessity of resubmitting Exhibit M.¹⁴ The non-price scoring differences between IPC and the IE were too small to affect bid ranking, but three bids showed meaningful differences. One of the bids for which the non-price scoring differed is included in both the initial and final shortlist. According to IPC, [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] is unlikely to meet its COD of December 1, 2027, and there are concerns about fuel supply. The IE does not explain their disagreement with this assessment. However, because this bid was the only one in its technology category, the exact non-price score did not matter. The Company and the IE are in agreement on price scores. The initial shortlist includes 42 bids consisting of 15 facilities. The IE states that the Company’s approach was reasonable, and the process was “executed in a fair and impartial manner.”¹⁵ After selection, all initial shortlist projects submitted project updates and firm cost inputs. Table 3 shows the initial shortlist.

Table 3: Initial Shortlist Ranking

Standalone Wind			
Bidder	Project	Facility Name	Score
[BEGIN CONFIDENTIAL] [REDACTED]	[BEGIN CONFIDENTIAL] [REDACTED]	[BEGIN CONFIDENTIAL] [REDACTED]	95
Standalone BESS			
Bidder	Project	Facility Name	Score
[REDACTED]	[REDACTED]	[REDACTED]	100
[REDACTED]	[REDACTED]	[REDACTED]	83.65
[REDACTED]	[REDACTED]	[REDACTED]	80.14
[REDACTED]	[REDACTED]	[REDACTED]	77.82
[REDACTED]	[REDACTED]	[REDACTED]	77.07
[REDACTED]	[REDACTED]	[REDACTED]	71.91
Standalone Solar			
Bidder	Project	Facility Name	Score
[REDACTED]	[REDACTED]	[REDACTED]	94.38
[REDACTED]	[REDACTED]	[REDACTED]	77.4
[REDACTED]	[REDACTED]	[REDACTED]	72.34
[REDACTED]	[REDACTED]	[REDACTED]	72.3
[REDACTED]	[REDACTED]	[REDACTED]	69.93
[REDACTED]	[REDACTED]	[REDACTED]	69.23
[REDACTED]	[REDACTED]	[REDACTED]	68.24
[REDACTED]	[REDACTED]	[REDACTED]	66.08
[REDACTED]	[REDACTED]	[REDACTED]	64.71

¹⁴ [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] indicated they had no changes to Exhibit M, draft letter of credit, and hence did not submit a redline.

¹⁵ Docket No. UM 2317, London Economics International, [Closing Report](#), January 15, 2025, p. 28.

[REDACTED]	[REDACTED]	[REDACTED]	62.68
[REDACTED]	[REDACTED]	[REDACTED]	62.41
[REDACTED]	[REDACTED]	[REDACTED]	62.4
[REDACTED]	[REDACTED]	[REDACTED]	62.36
[REDACTED]	[REDACTED]	[REDACTED]	62.13
[REDACTED]	[REDACTED]	[REDACTED]	62.17
[REDACTED]	[REDACTED]	[REDACTED]	60.71
[REDACTED]	[REDACTED]	[REDACTED]	60.69
Solar Plus BESS			
Bidder	Project	Facility Name	Score
[REDACTED]	[REDACTED]	[REDACTED]	90.81
[REDACTED]	[REDACTED]	[REDACTED]	89.59
[REDACTED]	[REDACTED]	[REDACTED]	89.01
[REDACTED]	[REDACTED]	[REDACTED]	88.44
[REDACTED]	[REDACTED]	[REDACTED]	88.42
[REDACTED]	[REDACTED]	[REDACTED]	86.62
[REDACTED]	[REDACTED]	[REDACTED]	80.71
[REDACTED]	[REDACTED]	[REDACTED]	80.8
[REDACTED]	[REDACTED]	[REDACTED]	79.78
[REDACTED]	[REDACTED]	[REDACTED]	80.38
[REDACTED]	[REDACTED]	[REDACTED]	79.29
[REDACTED]	[REDACTED]	[REDACTED]	77.35
[REDACTED]	[REDACTED]	[REDACTED]	76.92
[REDACTED]	[REDACTED]	[REDACTED]	75.76
[REDACTED]	[REDACTED]	[REDACTED]	75.95
Combined Wind Plus BESS			
Bidder	Project	Facility Name	Score
[REDACTED]	[REDACTED]	[REDACTED]	100
Combined Hybrid Gas/H2 Plus BESS			
Bidder	Project	Facility Name	Score
[REDACTED]	[REDACTED]	[REDACTED]	90
Combined Energy Plus BESS			
Bidder	Project	Facility Name	Score
[REDACTED] [END CONFIDENTIAL]	[REDACTED] [END CONFIDENTIAL]	[REDACTED] [END CONFIDENTIAL]	99.38

Request 3: In Reply Comments, IPC should provide the updated COD estimate for [REDACTED] [END CONFIDENTIAL], articulate all fuel supply concerns with this bid, and explain how these issues affect the Company's decision to keep or not keep the project on the FSL.

Preliminary Final Shortlist

IPC used AURORA to conduct analysis of the ISL, using scenarios developed as part of the 2023 IRP process, including: Base case, later COD for B2H and SWIP - N, high gas price/high carbon price, low gas price/zero carbon price, large load addition of 100 MW, large load addition of 200 MW, large load addition of 100 MW with EPA rule, and large load addition of 200 MW with EPA rule. Three changes were made to inputs from the 2023 acknowledged IRP: the load forecast was updated, the natural gas price forecast was updated, and eight resources, set to come online in 2026/2027, procured through the last RFP, were added, reducing the resource need shown in the 2023 IRP to zero. The Company should address in Reply Comments how each of these changes affected resource needs, which is necessary for Staff to evaluate the FSL. The following characteristics for each proposed resource were included in the analysis: Nameplate capacity, load shapes, fixed/variable costs, ramp rates, costs, and capacity values. Energy production estimates for wind and solar were reviewed by an independent third party and Idaho Power made all recommended adjustments.¹⁶ AURORA was then able to pick any of the initially shortlisted projects in eight scenario runs. Ultimately, eight projects were selected, including 959 MW of solar, 178.6 MW of wind, 350 MW of BESS, and 110 MW of Gas/H2 associated with an additional 110 MW of BESS. All bids are resource-based products since no market-based products were submitted. Four out of eight projects selected resulted in utility owned bids. One is a benchmark bid, and the others are BTAs. The Table below summarizes the scenarios and shows which resources were selected.

Table 4: Scenarios and Resource Selections

Scenario	Characteristics	Selections
#1 Base	<ul style="list-style-type: none"> • 2023 IRP assumptions • SWIP-North November 2028 COD • B2H November 2027 COD 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] [END CONFIDENTIAL])
#2 B2H	<ul style="list-style-type: none"> • #1 Base, except: • SWIP-North online in 2029 • B2H online in 2029 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] [END CONFIDENTIAL]) • 400 MW solar PPA ([BEGIN CONFIDENTIAL] [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] [END CONFIDENTIAL])

¹⁶ Hendrickson Renewables, Confidential Energy Production Estimate Reviews for the Idaho Power 2028 All-Source RFP, December 3, 2024.

Scenario	Characteristics	Selections
		<ul style="list-style-type: none"> • 150 MW BESS BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 200 MW BESS BSA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 110 MW Gas + 110 MW BESS BTA/BSA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
#3 High Price	<ul style="list-style-type: none"> • #1 Base, except: • High gas prices from 2023 EIA Annual Energy Outlook • High carbon price from Executive Order 13990 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
# 4 Low Price	<ul style="list-style-type: none"> • #1 Base, except: • Low gas prices from 2023 EIA Annual Energy Outlook • Zero carbon costs 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
# 5 100 MW	<ul style="list-style-type: none"> • #1 Base, except: • Additional 100 MW peak capacity need in 2028 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 400 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
# 6 200 MW	<ul style="list-style-type: none"> • #1 Base, except: • Additional 200 MW peak capacity need in 2028 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 400 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])

Scenario	Characteristics	Selections
		<ul style="list-style-type: none"> • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 110 MW Gas + 110 MW BESS BTA/BSA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
# 7 100 MW EPA	<ul style="list-style-type: none"> • #5 100 MW, except: • Compliance with new Clean Air Act section 111(d) carbon emission rules 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 400 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])
# 8 200 MW EPA	<ul style="list-style-type: none"> • #6 200 MW, except: • Compliance with new Clean Air Act section 111(d) carbon emission rules 	<ul style="list-style-type: none"> • 330 MW solar BTA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 400 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 80 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 149 MW solar PPA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 178.6 MW wind Benchmark ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL]) • 110 MW Gas + 110 MW BESS BTA/BSA ([BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL])

IPC neither considers nor discusses any learnings from this scenario analysis, but simply proceeds to the next step. Staff believes the Company should evaluate what the

scenario selections tell us about the attributes of different projects, and how resilient they are in different futures.

Forward energy, or wholesale electricity prices, are an important variable in determining the potential benefits of a resource. IPC does not develop an independent forecast of such prices. Instead, AURORA estimates wholesale prices endogenously while building portfolios. Since the filing and the IE report do not provide any information on wholesale prices, Staff is unable to review whether the derived prices are reasonable. To ensure consistency in treatment, Staff would like to see the forward market prices developed in this RFP in comparison with the 2023 IRP.

Request 4: In Reply Comments, IPC should detail how updates to load forecast, natural gas prices forecast, and 2026/2027 resource additions affect its proposed procurement size.

Request 5: In Reply Comments, IPC should provide a narrative about the qualitative attributes of projects derived from the scenario analysis, and how those attributes affect the final selection. The Company should specifically address the Gas/BESS project, including the dependence on the B2H COD.

Request 6: In Reply Comments, IPC should explain the role of wholesale energy prices in resource selection. The Comments should contain information that allow Staff to compare prices derived in the RFP portfolio runs to those of the 2023 IRP.

Portfolio Sensitivity Analysis

Using the base case, IPC performed a portfolio sensitivity analysis on the eight preliminarily selected projects to understand the range of NPV portfolio costs over a range of random variation. The portfolio sensitivity analysis was consistent with the methodology used in IPC’s 2023 IRP, including 60 iterations with varying hydro generation, load, natural gas price, and carbon price. IPC examined eight portfolios, which each included only existing resources plus the addition of one project from the preliminary shortlist. AURORA was not allowed to select additional resources for economic or capacity reasons. Next, the Company ranked the preliminary shortlist by mean NPV of the sensitivity analysis, implying that those portfolios have favorable economics. Table 5 shows the portfolio ranking and NPV costs.

Table 5: Ranking by Mean Portfolio NPV Cost (\$000)

Projects	Portfolios			
	P25	Mean	Median	P75
[BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] 330 MW Solar	9,272,082	9,806,121	9,735,181	10,281,904
[BEGIN CONFIDENTIAL] [REDACTED] [END	9,346,324	9,916,469	9,847,329	10,389,744

Projects	Portfolios			
	P25	Mean	Median	P75
CONFIDENTIAL] 80 MW Solar				
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 149 MW Solar	9,368,545	9,928,501	9,865,224	10,399,821
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 178.6 MW Wind	9,400,181	9,945,004	9,871,040	10,413,376
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 400 MW Solar	9,432,151	9,967,506	9,894,293	10,421,546
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 150 MW BESS	9,433,007	10,010,655	9,943,449	10,490,601
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 200 MW BESS	9,494,574	10,076,190	10,006,355	10,560,201
[BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] 110 MW Gas/H2 plus 110 MW BESS	9,629,369	10,187,718	10,123,074	10,654,797

IPC expressed concerns with two bids on its FSL, including the 150 MW BESS and the hybrid Gas/BESS projects. [BEGIN CONFIDENTIAL] ██████████

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Staff is uncertain about the current level of concern and what information would resolve outstanding concerns one way or the other; see *Request 3*.

Staff’s questions regarding the sensitivity analysis tie into Staff’s larger concern that the Company does not explain how the results of analysis impact selection for the FSL.

Does it make sense to compare portfolios solely on cost, without, for example considering reliability or the likelihood that a resource is actually needed?

Request 7: In Reply Comments, IPC should address how concerns regarding [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] were reflected in eligibility screening and non-price scoring.

Request 8: In Reply Comments, IPC should address why more frequently selected projects are ranked higher than less frequently selected projects and explicate the logic of the final ranking.

Final Shortlist and Contract Negotiations

Table 6 on the following page shows the final ranked shortlist. The Company states that it will inform all bidders of their inclusion in the FSL but prioritize negotiations with the higher-ranked projects. Furthermore, “the Company will work with bidders whose projects are on the final shortlist throughout negotiations to determine the most cost-effective, reliable, and prudent transactions given the circumstances at the time.”¹⁷

In its closing report, the IE notes concerns with IPC’s strategy of entering simultaneous contract negotiations with all project owners since this would not only render the ranking moot, but also be practically challenging.¹⁸ However, the IE does not suggest an alternate strategy.

Staff concurs with the IE’s criticism and is concerned about the practical implications, as the FSL contains more capacity than needed. In *Request 9* below, Staff would like to understand the decision points that will cause IPC to acquire more or less generating resources.

Consistent with Order No. 24-120, Staff expects that the Company will retain the IE to monitor and report on all contract negotiations.¹⁹ Retaining the IE increases transparency of the decisions made during contract negotiations and helps mitigate concerns about impropriety or ownership-bias. Staff will recommend this as a condition for the Commissions acknowledgement decision.

Request 9: In Reply Comments, the Company should elaborate on how they will proceed with making final procurement decisions based on the FSL, including under which conditions how much capacity will be acquired.

¹⁷ Docket No. UM 2317, [Idaho Power Company’s Request for Acknowledgement](#), January 10, 2025, p. 18f.

¹⁸ Docket No. UM 2317, London Economics International, [Closing Report](#), January 15, 2025, p. 59f.

¹⁹ Docket No. UM 2317, [Order No. 24-120](#), May 2, 2024, Appendix A, p. 16.

Table 6: Final Ranked Shortlist

Project	Owner	Technology	Bid Type	Ownership	Delivery Year
[BEGIN CONFIDENTIAL] ██████████	[BEGIN CONFIDENTIAL] ██████████	330 MW solar	Resource-based product	BTA	2028
██████████	██████████	80 MW solar	Resource-based product	PPA	2028
██████████	██████████	149 MW solar	Resource-based product	PPA	2028
██████████	██████████	178.6 MW wind	Resource-based product	Benchmark/Asset Purchase	2028
██████████	██████████	400 MW solar	Resource-based product	PPA	2028
██████████ ██████████	██████████	150 MW BESS	Resource-based product	BTA	2028
██████████	██████████	100 MW BESS	Resource-based product	BSA	2028
██████████ [END CONFIDENTIAL]	██████████ [END CONFIDENTIAL]	100 MW gas/H2 plus 110 MW BESS	Resource-based product	BTA/BSA	2028

Overlapping Timelines

In Order No. 24-272, the Commission carved the RFP into two bid groups with overlapping timelines to give the Company an opportunity to compare and consider trade-offs when developing the shortlists:

This overlap allows the Company to assess the market for later COD bids that do not meet the interconnection requirement ("Exhibit R Eligible" bids) before the FSL for the first two groups of bids has been acknowledged. The Company states that this will give them the opportunity to compare what has been received in the second group to what was selected to the ISL, allowing for a consideration of tradeoffs associated with later COD bids. For example, if Idaho Power determines that a project from the Exhibit R Eligible group is more economic and lower risk than a project selected to the first ISL, the Company will have the opportunity to pursue

this project in place of the riskier or less economical project selected to the ISL.²⁰

The two groups are shown in Table 7 below. To Staff, this suggests that IPC should wait to finalize the FSL until it has reviewed Group 2 bids, which will only be opened after January 27, 2025. Furthermore, Staff believes that two proposals by **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]** that have a GIA, but a COD of December 2028, appear to have been inappropriately moved to Group 2.²¹ According to the Commission-approved RFP, the initial bidding round would evaluate all GIA eligible projects, including those with a COD later than April 1, 2028. In an email response to Staff, the Company indicates that they moved these proposals to Group 2 because it would not make sense to compare them with earlier COD bids and there were no later COD bids available to compare them to. Staff believes that this does not comply with the procedures outlined in the RFP. To remedy this, Staff would like the Company to provide a detailed explanation about why this bid was not considered alongside other Group 1 bids and what it sees as the path forward for further evaluating this bid.

Table 7: Eligible Bid Groups²²

	Group 1 / Round 1		Group 2 / Round 2
	2028 GIA eligible	2029 GIA Eligible	Exhibit R Eligible
COD	April 1, 2028	Later than April 1, 2028	Later than April 1, 2028
GIA Requirement	Evidence of an active Generator Interconnection Agreement or Generator Interconnection Application is required.		Not required. Proposals intend to enter the cluster study process in March 2025.
Timeline	Evaluated on the schedule proposed in Section 2.8 of the Draft Final RFP.		Evaluated on the schedule proposed in Exhibit R of the Draft Final RFP.
Capacity	128 MW of incremental peak capacity. 555 MW of supply-side resource additions.	511 MW of incremental peak capacity. 1,190 MW of supply-side resource additions.	

Request 10: in Reply Comments, IPC should explain how it will consider Group 2 bids when finalizing the FSL.

²⁰ Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024, Appendix A, p. 7.

²¹ Docket No. UM 2317, London Economics International, [Closing Report](#), January 15, 2025, p. 20.

²² Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024, Appendix A, p. 5.

Request 11: In Reply Comments, IPC should at a minimum communicate the price and non-price scores of the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] bids and, if possible, evaluate whether they would be selected in the portfolio analysis if December 2028 was used as the constraining COD. Further, IPC should explain why the Company diverged from procedures outlined in the RFP.

Compliance with Rules and Orders

In this section, Staff evaluates currently available information regarding compliance with competitive bidding rules and Commission decisions. If additional information is required, Staff makes a request below. Staff will only take a final position on compliance in its upcoming report to the Commission.

- OAR 860-089-0100 Applicability of Competitive Bidding Requirements

OAR 860-089-0100 is applicable and competitive bidding rules have been applied to evaluate this RFP.

- OAR 860-089-0200 Engaging an Independent Evaluator

The Company engaged London Economics International (LEI) as an IE to oversee the competitive bidding process. In Order No. 24-120, the Commission approved this selection, waiving the requirement to conduct a competitive selection.²³

- OAR 860-089-0250 Design of Request for Proposals

The Company filed a draft RFP as well as scoring and modeling methodology on February 29, 2024.²⁴ IPC held workshops on April 2, 2024, and May 14, 2024, to solicit feedback.²⁵ The Company filed revisions to its draft on April 24, 2024, May 17, 2024, and July 16, 2024.²⁶ On May 28, 2024, the IE filed its initial report based on its review of the Company's draft 2028 RFP and scoring and modeling methodology; a follow-up report was published on August 2, 2024.²⁷ Staff, NIPPC, Renewable NW, Key Capture Energy, and IPC filed comments on the RFP draft and Staff's recommendations.²⁸ The Commission considered the 2028 RFP at its August 15, 2024, public meeting, adopting Staff's recommendations with modification, approving the 2028 RFP and scoring and modeling methodology, and directing Idaho Power to include language in the 2028 RFP to clarify that in the event of a material change in law that requires repricing, the opportunity to rebid would be available to all bidders in the same timeline.²⁹ The

²³ Docket No. UM 2317, [Order No. 24-120](#), May 2, 2024.

²⁴ Docket No. UM 2317, [Application for Approval of 2028 All-Source RFP](#), February 29, 2024.

²⁵ Docket No. UM 2317, [Presentation Slides](#), April 2, 2024; Docket No. UM 2317, [Presentation Slides](#), May 14, 2024.

²⁶ Docket No. UM 2317, [Revised 2028 All Source RFP](#), April 24, 2024; Docket No. UM 2317, [Final Draft](#), May 17, 2024. Docket No. UM 2317, [Updated Final Draft](#), July 16, 2024.

²⁷ Docket No. UM 2317, [IE's Initial Report](#), May 28, 2024. Docket No. UM 2317, [IE's Draft Second](#), August 2, 2024.

²⁸ See Docket No. UM 2317.

²⁹ Docket No. UM 2317, [Order No. 24-272](#), August 16, 2024.

Company formally issued the 2028 RFP, with the Commission's modification, on August 16, 2024.

- OAR 860-089-0300 Resource Ownership

The Company submitted four benchmark bids. All ratepayer-funded/utility-owned assets being used by the benchmark bids were described in Exhibit P of the 2028 RFP.³⁰ IPC does not intend to offer access to the assets used by three of its benchmark resources to third-party bidders **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]**; access to the fourth benchmark resource **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** would be conditional. The IE finds this to be reasonable based on IPC's explanation and Staff has no concerns at this point. The 2028 RFP allowed independent power producers to submit bids with and without an option to renew and did not specify any desired ownership structure.

- OAR 860-089-0350 Benchmark Resource Score

The Company submitted four benchmark bids to be considered in Group 1, which were prepared by a separate team, and evaluated prior to the opening of the regular bids, as evidenced by the August 28, 2024, filing.³¹ As referenced earlier, the IE submitted a report on the benchmark bids.

- OAR 860-089-0400 Bid Scoring and Evaluation by Electric Company

Bid Scoring criteria were transparently explained in the final RFP and followed by the Company, as addressed earlier in these comments. The IE had access to scoring and analysis, as described in the IE closing report.

- OAR 860-089-0450 Independent Evaluator Duties

Working closely with Staff, LEI oversaw the 2028 RFP process and has not alerted Staff to any lacking cooperation from the Company. The closing report of the IE states that they have no objections to the FSL, "the process was conducted with the utmost fairness and impartiality, upholding the integrity of the selection process."³²

- OAR 860-089-0500 Final Shortlist Acknowledgement

The Company requests Commission acknowledgement of the FSL by April 1, 2025, in the present filing. The filing includes the IE's closing report, the electric company's final shortlist of responsive bids, a description of sensitivity analyses performed, and a discussion of the consistency between the final shortlist and the electric company's last-acknowledged IRP.

³⁰ Docket No. UM 2317, [Updated Exhibit P](#), July 25, 2024.

³¹ Docket No. UM 2317, [Idaho Power's Benchmark Bid Evaluations](#), August 28, 2024.

³² Docket No. UM 2317, London Economics International, [Closing Report](#), January 15, 2025, p. 8.

- SMM Condition No. 1: Prior to the selection of an FSL, IPC should clearly specify and provide supporting documentation for any changes to the 2028 capacity need and publish this documentation to this docket and to bidders.

Staff finds the stated capacity need somewhat vague and asks the Company to provide more information; see *Request 1*.

- SMM Condition No. 2: IPC work with the IE to develop a sensitivity that reflects decreases to the stated 2028 capacity need and include this sensitivity in the Final Shortlist.

Staff finds no evidence that a specific sensitivity that reflects decreases to the stated 2028 capacity need was developed. Sensitivity analysis only includes stochastic load variation in line with the 2023 IRP. From conversations with the Company, Staff understands that, given its updated load forecast, the Company views the base case as reflective of low end of its 2028 capacity need. Staff is already seeking more information from the Company to support its updated and increased 2028 capacity need in *Requests 1, 4, and 9*. Staff refrains from stating a position on adherence to this Condition until it has reviewed the updated load materials to determine whether the base case might adequately serve as the sensitivity requested.

- SMM Condition No. 3: With the FSL, IPC should share with Staff and the IE modeling results that demonstrate the Company has considered bids from all three bid groups as appropriate.

Staff believes this has not been sufficiently demonstrated, see *Requests 10 and 11*.

- SMM Condition No. 4: IPC work with the IE to develop a sensitivity analysis that evaluates the impact of a range of ITC and PTC discount rates on bids.

Staff finds no evidence that such a sensitivity analysis was conducted. Information received by Staff does not fully address how assumptions made on the ITC and PTC resale value affect the relative competitiveness of utility-owned bids vs. PPAs or BSAs.

Request 12: In Reply Comments, IPC should state ITC and PTC discount rates used and present a sensitivity analysis that shows how ISL rankings would change under high/medium/low discount rate scenarios.

- SMM Condition No. 5: IPC will ensure the IE includes an assessment of the reasonableness of any costs allocated to ERIS bids in its initial shortlist report.

The IE stated in an email to Staff on January 8, 2025: “There was no discussion of IPC’s cost assumptions for ERIS projects in the ISL report because IPC did not make any special assumptions for these costs. Instead, the costs used in the financial models resulted from the latest information IPC had on network upgrades costs for the projects.” ERIS studies do not fully evaluate the capability of the system to integrate prospective resources; only upgrades needed to interconnect resources at the point of

interconnection are identified. Any additional required upgrades remain unknown until a network transmission service request is submitted – in this respect, one could inflate the currently known network upgraded costs to account for potential future upgrades costs that might be required for the system. However, IPC used the network upgrades costs as known and did not make further assumptions. Staff has no concerns since no cost-adders were used and no ERIS project was included in the FSL.

- RFP Condition No. 1: IPC work with Staff and Stakeholders to finalize the RFP schedule, including but not limited to the timing of benchmark bid scoring, IE reports, and price updates, prior to releasing the RFP.

The RFP schedule has been posted in Docket No. UM 2317.³³

- RFP Condition No. 2: IPC reflect in Long Term Service Agreement costs of utility-owned bids either augmentation costs associated with maintaining the system performance at its original state throughout the project duration, or costs associated with maintaining a specified battery degradation curve.

This issue is discussed in the IE Benchmark Report. **[BEGIN CONFIDENTIAL]** [REDACTED]

[END

CONFIDENTIAL] However, the IE did not evaluate unique risks of BESS that are acquired through BTAs. There is one such project on the FSL, **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** The IE will cover unique risks of utility-owned non-benchmark resources in a supplemental report, at which point Staff will evaluate this issue.

Request 13: In Reply Comments, IPC should address whether augmentation/maintenance costs have been appropriately reflected for **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]**.

- RFP Condition No. 3: IPC allow for bids from existing resources with expiring contracts to offer incremental capacity to the system, including those that would repower.

According to 4.3 of the RFP, existing resources with expiring contracts are allowed to offer incremental capacity. No bids with those characteristics were submitted.

- RFP Condition No. 4: IPC change the form contracts to include yearly output guarantees instead of monthly guarantees.

Exhibit F of the RFP under 7.12 defines output guarantees by month. In response to RFP Condition No. 4, the Company inserted an optional alternative form contract, defining output guarantees by year, directly following Exhibit F on page 451 of the PDF.

³³ Docket No. UM 2317, [Staff's Updated Schedule](#), October 14, 2024.

Summary of Requests

Request 1: In Reply Comments, IPC should detail the reasons for significant volume changes in its procurement strategy, including changes to ELCC values.

Request 2: In Reply Comments, IPC should address the concerns outlined by the IE in its benchmark bid report, including construction cost overruns, additional capital costs, and decommissioning costs for any benchmark bid included in the FSL. In addition, IPC should explain the 0 percent FOR for the wind project.

Request 3: In Reply Comments, IPC should provide the updated COD estimate for [BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL], articulate all fuel supply concerns with this bid, and explain how these issues affect the Company's decision to keep or not keep the project on the FSL.

Request 4: In Reply Comments, IPC should detail how updates to load forecast, natural gas prices forecast, and 2026/2027 resource additions affect its proposed procurement size.

Request 5: In Reply Comments, IPC should provide a narrative about the qualitative attributes of projects derived from the scenario analysis, and how those attributes affect the final selection. The Company should specifically address the Gas/BESS project, including the dependence on the B2H COD.

Request 6: In Reply Comments, IPC should explain the role of wholesale energy prices in resource selection. The Comments should contain information that allow Staff to compare prices derived in the RFP portfolio runs to those of the 2023 IRP.

Request 7: In Reply Comments, IPC should address how concerns regarding [BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] were reflected in eligibility screening and non-price scoring.

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Request 11: In Reply Comments, IPC should at a minimum communicate the price and non-price scores of the [BEGIN CONFIDENTIAL] ██████████ [END CONFIDENTIAL] bids and, if possible, evaluate whether they would be selected in the portfolio analysis if December 2028 was used as the constraining COD. Further, IPC should explain why the Company diverged from procedures outlined in the RFP.

Request 12: In Reply Comments, IPC should state ITC and PTC discount rates used and present a sensitivity analysis that shows how ISL rankings would change under high/medium/low discount rate scenarios.

Request 13: In Reply Comments, IPC should address whether augmentation/maintenance costs have been appropriately reflected for [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL].

This concludes Staff comments.

/s/ Benedikt Springer

January 24, 2025

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