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**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 is Idaho Power Company's ("Idaho Power") revised and updated Exhibit P – Benchmark Bids with proposed benchmark bids provided by the Idaho Power's Internal Bid Team.

Sincerely,

A handwritten signature in black ink that reads "Adam Lowney".

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

Proposed 2028 and 2029 AS RFP Benchmark Bids

Idaho Power intends to submit the following four (4) individual Benchmark Bids for commercial operation in 2028 (“2028 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)	ID1	Asset Purchase / Battery Storage Agreement	Mix	215	20	4/1/2028	New	Hemingway 230 kV Substation	Owyhee, Idaho	No	LGIA
4	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

Idaho Power provides the following potential Benchmark Bids for commercial operation Post-2028 (“Post-2028 Benchmark Bids”)<sup>1</sup>:

Preliminary List of Post-2028 Benchmark Bids				
Resource Type	Benchmark Type/Structure	Capacity (MW)	Existing or New	State
Solar and/or BESS	Asset Purchase	25 - 200	Existing Site, Expansion	Idaho
Solar and/or BESS	Asset Purchase		Existing Site, Expansion	Idaho
Solar and/or BESS	Asset Purchase		Existing Site, Expansion	Idaho
Solar and/or BESS	Asset Purchase		Existing Site, Expansion	Idaho
Solar and/or BESS and/or Gas	Asset Purchase	25 - 150	Existing Site, Expansion	Idaho
Solar and/or BESS and/or Gas	Asset Purchase		Existing Site, Expansion	Idaho
Solar and/or BESS and/or Gas	Asset Purchase		Existing Site, Expansion	Idaho
Solar and/or BESS and/or Gas	Asset Purchase		Existing Site, Expansion	Idaho

<sup>1</sup> Post-2028 Benchmark Bids are preliminary and are provided for informational purposes as prospective Benchmark Bids currently being evaluated pertaining to a Post-2028 commercial operation date pursuant to Exhibit R – Supplemental 2029 and Later Requirements. Idaho Power intends to seek approval to submit Post-2028 Benchmark Bids concurrent with the timeline for submission of all other post-2028 bids.

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

Solar and/or BESS and/or Gas	Asset Purchase		Potential Greenfield Development	Idaho
Solar and/or BESS	Asset Purchase	25-150	Existing Site, Expansion	Idaho
Solar and/or BESS	Asset Purchase		Existing Site, Expansion	Idaho
BESS and/or Solar and/or Wind	Prospective Partnership TBD	100-150	Joint Development, Expansion	Idaho
BESS	Prospective Partnership TBD	25-115	Joint Development, Expansion	Idaho
Wind	Asset Purchase	25-150	Existing Site, Expansion	Oregon
Wind	Prospective Partnership TBD	25-200	Joint Development, New	Wyoming

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. 2028 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. 2028 Benchmark Bid No. 3 and 4 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. All Post-2028 Benchmark Bids are either 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) or located on property that Idaho Power has no current rights directly and is relying on partnership site control (thus cannot offer site access as Idaho Power has no authority to do so).