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January 10, 2025

**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.**

Attention Filing Center:

Attached for filing in the above-referenced docket, please find Idaho Power Company's Request for Acknowledgment of Final Shortlist of Bidders in the 2028 All-Source Request for Proposals. The confidential version of this filing will be distributed via an encrypted, password protected and zipped folder to parties who have signed General Protective Order No. 23-132.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cole Albee".

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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 to  
Meet 2028 Capacity Resource Need.

**REQUEST FOR ACKNOWLEDGMENT  
OF FINAL SHORTLIST OF BIDDERS  
IN THE 2028 ALL-SOURCE REQUEST  
FOR PROPOSALS**

**I. INTRODUCTION**

In accordance with OAR 860-089-0500, Idaho Power Company (Idaho Power or Company) requests that the Public Utility Commission of Oregon (Commission) acknowledge the final shortlist of bidders in Idaho Power’s 2028 All-Source Request for Proposals for peak capacity and energy resources (2028 RFP or RFP) for bids with a commercial operation date no later than April 1, 2028 (2028 bids). While the 2028 RFP solicited 2028 bids, as well as bids beyond 2028, in this filing, the Company is seeking acknowledgment of the 2028 RFP final shortlist to meet the 2028 energy and capacity needs outlined in the acknowledged 2023 Integrated Resource Plan (2023 IRP).<sup>1</sup> The energy and capacity needs beyond 2028 and solicited as part of the 2028 RFP will be evaluated at a later date.

**II. IDAHO POWER RESOURCE NEED**

In this RFP, Idaho Power is pursuing energy and capacity resources to meet customers’ needs and ensure the Company can continue to reliably meet the growing

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<sup>1</sup> [Integrated Resource Plan \(idahopower.com\)](https://idahopower.com)

demands on its electrical system. Idaho Power recognizes that during the near-term resource decision-making phase, the annual capacity positions can be very fluid and therefore regularly performs system reliability assessments. The Company constantly monitors resource needs, and in the face of growing loads and deficits has responded with added and appropriate urgency to acquire additional low-cost, reliable sources of generation and capacity, as evidenced by the consecutive issuance of RFPs to acquire resources to be online in 2023,<sup>2</sup> 2024, 2025,<sup>3</sup> 2026 and 2027.<sup>4</sup>

The annual capacity position developed to inform Idaho Power's 2023 IRP, which was filed on September 29, 2023, and reflected current information on the expected timing of major new loads, the resource procurements the Company has made to date, and other updates, identified 138 MW of incremental peak capacity needs in 2028, 142

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<sup>2</sup> In June 2021, the Company issued an RFP for approximately 80 megawatts ("MW") of capacity. This RFP was exempt from the Oregon competitive bidding rules due to its size, and the Company conducted a competitive solicitation through an RFP seeking to acquire Idaho Power-owned resources, to be online by June 2023. The procurement process resulted in the acquisition of least-cost, least-risk resources necessary to fill the 2023 capacity deficiency. The Company performed a qualitative and quantitative evaluation of the project proposals submitted through the RFP process as well as a parallel investigation into different configurations of Company-owned and constructed battery storage systems, which culminated in the acquisition of 120 MW of dispatchable energy storage as well as a 20-year power purchase agreement for the output of a planned third-party solar facility.

<sup>3</sup> In December 2021, the Company issued an RFP to meet the resource deficiencies identified in 2024 and 2025. The procurement process resulted in the acquisition of least-cost, least-risk resources necessary to fill the 2024 and 2025 deficiencies. The Company performed a qualitative and quantitative evaluation of the project proposals submitted through the RFP process which culminated in a 25-year power purchase agreement for the output of a third-party solar facility, the acquisition of 173 MW of Idaho Power owned dispatchable energy storage as well as a 20-year battery services agreement for the capacity of a 150-MW battery storage system owned and operated by a third-party.

<sup>4</sup> In June 2023, the Company issued an RFP to meet the resource deficiencies identified in 2026 and 2027. The procurement process resulted in the acquisition of least-cost, least-risk resources necessary to fill the 2026 and a portion of the 2027 deficiencies. Idaho Power is still negotiating agreements to procure 2027 resources to fill the remaining capacity deficiency. The Company performed a qualitative and quantitative evaluation of the project proposals submitted through the RFP process which culminated in the execution of a 200 MW market purchase product and a total of 250 MW of Idaho Power-owned battery storage for 2026 as well as a combined power purchase agreement for the output of a third-party wind facility providing approximately 300 MW and a Company-owned wind powered generation facility providing approximately 300 MW for 2027.

MW in 2029, and growing to over 1,150 MW by 2038,<sup>5</sup> driving the need for additional resources in 2028 and beyond.<sup>6</sup> With Idaho Power's resource procurement efforts for 2026 and 2027 advancing, in February 2024, the Company filed its initial application in this proceeding to address resource needs beginning in 2028. Idaho Power continues to experience high load growth across its service territory, including major new large loads. Assuming adequate resources are procured to meet 2026-2027 needs, at the time of the filing of the initial Application in this proceeding, the Company expected to need significant incremental capacity by the summer of 2028 and beyond. As a result of these findings and ongoing evaluation of Idaho Power's resource position, this RFP sought bids for a combination of capacity and energy resources that provide a minimum of approximately 138 MW of incremental peak capacity and 555 MW of supply-side resource additions in 2028 and beyond.

**A. The 2023 IRP identified significant incremental capacity needs should major new large loads materialize.**

Specifically related to large customers in the service area, the Company continues to see substantial interest from large industrial customers that wish to site, or expand operations, in Idaho Power's service area. 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. Incremental needs associated with potential large customers is not part of the Company's current load forecast and could increase resource

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<sup>5</sup> Idaho Power 2023 IRP at 174 (Table 11.15).

<sup>6</sup> Forecasted peak load is anticipated to grow by approximately 80 MW per year on average, or 1,500 MW over the next two decades due to unprecedented customer growth.

needs in the near term substantially. For example, in the 2023 IRP Idaho Power included a Large Load growth scenario that resulted in increased incremental capacity needs of 200 MW more than the incremental capacity needs referenced earlier, further supporting the 2028 RFP solicitation.

### **III. RFP DEVELOPMENT**

To ensure a fair and transparent procurement process that was compliant with the Commission's competitive bidding rules, on February 29, 2024, Idaho Power filed an application requesting the Commission: (1) approve the selection of London Economics International, LLC (LEI) as the independent evaluator (IE) to oversee the 2028 RFP process, (2) approve the scoring and modeling methodology for the 2028 RFP, (3) approve the draft 2028 RFP, and (4) waive certain competitive bidding rules (OAR 860-089-0100 *et seq.*) to allow expedited review and approval of the 2028 RFP. The requested waivers enabled the Company to have the 2028 RFP review process run in parallel with the 2023 IRP docket and occur on an expedited basis, to continue working with LEI, the IE approved for Idaho Power's 2026 All-Source RFP, and to have the scoring and modeling methodology review occur in parallel with review of the draft 2028 RFP. On May 2, 2024, the Commission approved the Company's use of LEI as the IE, and on August 15, 2024, in a Special Public Meeting, the Commission approved Idaho Power's scoring and modeling methodology and the final draft 2028 RFP.

As required by OAR 860-089-0300, the Company identified a separate team of Idaho Power staff and retained consultants (Internal Bid Team) to submit resource-based product bids or benchmark bids. As such, the Company instituted a Separation of Functions protocol where the evaluation of bids would be performed by a separate team

of Idaho Power staff and retained consultants with relevant subject matter expertise (Evaluation Team) to work directly with the IE. This Separation of Functions protocol was developed with the purpose to define specific roles and responsibilities and outlined policies and procedures to be maintained as a living document to ensure the Evaluation Team and Internal Bid Team operate separately, and access to any non-public information is not shared.

The 2028 RFP solicited bids for capacity and energy delivered from specific electric resources (Resource Based Proposal) and firm energy that meets the eligibility requirements of the Western Resource Adequacy Program (Market Purchase Proposals) that will begin delivery before summer 2028. The Company holds (or expects to hold) transmission rights on various paths that could be used for the delivery of various products, including capacity from the Boardman to Hemingway transmission line (B2H). As such, this RFP targeted resource procurements that could provide a minimum of approximately 138 MW of incremental peak capacity and 555 MW of supply-side resource additions in 2028 and beyond. The eligible products included asset purchases, power purchase agreements, and battery storage agreements with exclusive ownership by Idaho Power of any and all environmental attributes associated with the energy generated.

The 2028 RFP is designed to support the Company's reliability and cost-effective acquisition of resources in a manner and timeframe that supports appropriate planning and construction timelines, particularly when construction is necessary. Idaho Power also continues to source needed energy/capacity products through alternate permissible means as well, including but not limited to bilateral wholesale energy market transactions.

In particular, the Company plans for more near-term reliability needs (looking within the current year as well as multiple years into the future) and makes purchases through the bilateral wholesale energy market to acquire energy or capacity to associate with available transmission for reliability needs. These purchases may vary in length from less than a year to multiple years, and, in conjunction with RFPs such as this, ensure that Idaho Power has the necessary energy and capacity to meet its needs, both in the short-term and in the longer-term.

#### **IV. COMMISSION REVIEW AND APPROVAL OF THE RFP**

The Company hosted an introductory workshop on May 14, 2024, to present the Idaho Power's resource need, introduce the draft 2028 RFP and scoring and modeling methodology, and solicit feedback. After the workshop, Idaho Power made minor changes to the draft 2028 RFP and formally filed the draft 2028 RFP and associated scoring and modeling methodology with the Commission on April 24, 2024.<sup>7</sup>

During this time, the Company worked to respond to questions and comments from Staff, stakeholders, and the IE. 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. Staff filed its opening comments on June 3, 2024. Additionally, stakeholder comments were filed on the same date. The Company filed reply comments on June 10, 2024, and on July 16, 2024, Idaho Power filed a revised and updated final draft 2028 RFP based on feedback received from stakeholders, Staff, and LEI.<sup>8</sup>

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<sup>7</sup> A revised draft 2028 RFP was filed on May 17, 2024, with additional minor modifications.

<sup>8</sup> On July 25, 2024, Idaho Power filed a revised and updated Exhibit P with proposed benchmark bids in accordance with the docket schedule.

On July 29, 2024, Staff filed its recommendation to approve the Company's final 2028 RFP and the associated scoring and modeling methodology, which was followed by the Second IE Assessment Report on August 2, 2024. The Commission considered the 2028 RFP at its August 15, 2024, public meeting, adopting Staff's recommendations, with modifications, 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. The Company formally issued the 2028 RFP, with the Commission's modification, on August 16, 2024, with 2028 bids ultimately due September 17, 2024.<sup>9</sup>

## **V. RFP BID RESULTS**

The 2028 RFP was well received by the market. The Company received 95 proposals from 19 different bidders, with a total of 147 resource bids summing to more than 27 GW of resources. Notably, two developers submitted more than 10 resource-based proposals, with the highest number of proposals from a single company reaching 18. No market purchase proposals were received. Approximately 58 percent of the bids incorporated solar photovoltaic resources (Solar PV) within their portfolios, and approximately 39 percent incorporated energy storage. A summary of the proposals by resource type is provided below in *Table 1: Proposals by Resource Type*.

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<sup>9</sup> In accordance with Order No. 24-272, on October 4, 2024, Idaho Power reopened the Zycus portal to support the solicitation detailed in Exhibit R of the 2028 RFP. The multi-round event titled 2029 AS RFP – Round 2 is specific to the 2029 and beyond resources.



Table 1: Proposals by Resource Type

Resource Type	Number of Proposals
Wind	2
Wind + Battery Energy Storage System (BESS)	1
Solar PV	35
Solar PV + BESS	39
BESS	15
Gas to Hydrogen + BESS	1
Solar PV + Wind + BESS	1
Energy + BESS	1
<b>Total</b>	<b>95</b>

The resource capacity proposals presented varied in structure, featuring power purchase agreements, battery storage agreements, and asset purchases. A summary of the bids by ownership structure is provided below in *Table 2: Proposals by Ownership*.

Table 2: Proposals by Ownership

Owner	Number of Proposals
Bidder	75
Idaho Power	16
Mix	4
<b>Total</b>	<b>95</b>

On August 23, 2024, before third-party bids were due, the Company received four benchmark bids across three sites from the Internal Bid Team. Consistent with OAR 860-089-0350, Idaho Power reviewed the benchmark bids for conformity with minimum bid eligibility requirements and scored and filed the benchmark bid evaluations on August 28, 2024. The review and evaluation of the benchmark bids was completed prior to the Evaluation Team opening the third-party bids on September 17, 2024.

**VI. Bid Eligibility**

Following Idaho Power’s scoring and submittal of the benchmark bids, third party bids were screened against the specified minimum requirements as described in Section 4.1 of the 2028 RFP and further defined in Exhibit C to the 2028 RFP (Bid Eligibility Checklist). Accordingly, and with IE oversight, requests for clarification and/or additional information were solicited from the bidders (including the Company’s Internal Bid Team). With review and input from the IE, Idaho Power determined that certain 2028 bids were non-conforming and failed to meet the 2028 RFP’s initial bidder eligibility requirements. The Company issued a notice dated September 25, 2024, notifying bidders with non-conforming submittals, and provided the opportunity for bidders to correct their bid within five business days. Bidders unable to resolve the eligibility concerns were removed from further consideration. Concluding the eligibility screen, the number of conforming bids totaled 88, across 19 eligible bidders, with over 25 GW of resources<sup>10</sup>.

The below *Table 3 – Bid Eligibility* further summarizes the Company’s non-conformance rationale as it relates to the specific eligibility factors defined in Exhibit C – of the RFP<sup>11</sup>.

*Table 3: Bid Eligibility*

<b>Bidder</b>	<b>Proposal(s)</b>	<b>Non-Conforming Factors</b>	<b>Rationale for Non-Conformance</b>
██████████	4	6	Failed criteria #6 on interconnection agreement – they are not part of any cluster study, nor are they in a queue – nonetheless they could resubmit their bids for the beyond 2028 bids.

<sup>10</sup> This data includes all four of the submitted Benchmark bids.

<sup>11</sup> [2021 All-Source Request for Proposals \(RFP\) for Peak Capacity Resources \(idahopower.com\)](https://www.idahopower.com/2021-All-Source-Request-for-Proposals-RFP-for-Peak-Capacity-Resources)

**REDACTED**

Bidder	Proposal(s)	Non-Conforming Factors	Rationale for Non-Conformance
[REDACTED]	3	2, 6, 7, 8	No documents supporting delivery to an Idaho Power Point of Receipt.

**VII. Bid Evaluation and Determination of Initial Shortlist**

The bid evaluation process is designed to identify the combination and size of the proposed resources that will maximize the customer benefits while ensuring the Company meets its energy and capacity needs.

Eligible bids were evaluated pursuant to the process described in Section 7.2 Phase 1 – Initial Shortlist of the 2028 RFP to identify a subset of bids that would be advanced to further evaluation. Each bid was ranked within the respective technology group based on its pricing and non-pricing scores. The scoring methodology was consistent and prescriptive as described in the 2028 RFP. Based on the diversity of the technology of the bids, and to ensure fair and equitable evaluation of the bids, Idaho Power identified the need to group bids by their specific technology. As such, the Company utilized the following considerations to develop the initial shortlist within each disparate technology group.

1. All eligible bids were evaluated, and a combined price and non-price score was established for each technology grouping.
2. In general, the Company desired a reasonable and diversified quantity of projects that represent each technology category meeting the following principles:

- a. Minimum of three bidders/projects where sufficient bids were included,
- b. Sufficient capacity/energy quantity to meet the stated needs of the 2028 RFP,
- c. Technology categories that only had one bid were automatically moved forward to the initial shortlist, and
- d. Step increases to price and total score were utilized as a natural cutoff.

For purposes of clarity, the highest ranking and relatively lowest cost bids within each technology category moved forward to the initial shortlist.

Idaho Power provided its updated bid eligibility and confidential initial shortlist report to the IE on October 11, 2024. The Company received the confidential review of eligibility and initial shortlist report from the IE documenting initial evaluation and scoring of conforming bids on November 1, 2024, stating “LEI finds that IPC’s approach was reasonable, and the process was conducted in a fair and impartial manner.”. After conducting these evaluations and determining the initial shortlist as outlined in Section 7.2 of the 2028 RFP, on November 5, 2024, Idaho Power notified 11 bidders whose projects did not rank in the pool for further consideration to make the initial shortlist. The Company also notified bidders whose proposed bids had been ranked in the pool for further consideration to make the initial shortlist and requested: (1) any and all significant changes to overall projects (including schedule modifications, interconnection study results, or any other material changes), and (2) firm cost inputs (including any changes or modifications to project pricing) as defined in Section 7.3 Phase 2 - Final Shortlist of

the 2028 RFP, with updates due by November 11, 2024. Bidders receiving this notification of the best and final offer opportunity are considered to comprise the initial shortlist. Idaho Power's initial shortlist included all projects found to be conforming by the Company and the IE and included 42 projects from 19 bidders, consisting of 15 facilities across seven technologies.

### **VIII. Development of Final Shortlist**

Consistent with the bid evaluation and selection process outlined in the 2028 RFP, Idaho Power performed the following additional analyses and due diligence of the initial shortlist to identify and select projects on the final shortlist.

#### **A. Wind and Solar Performance Factors**

In accordance with OAR 860-089-0400(5)(a), the Company retained the services of Hendrickson Renewables, LLC (Hendrickson) to provide an independent third-party review of site-specific critical performance factors for wind and solar resources, including but not limited to: (1) an evaluation of the Variable Energy Resource (VER) assessments submitted with each applicable proposal, (2) quantification of any potential impact on energy production, and (3) adjustment (if any) to the P50 Net Capacity Factor (NCF) including the associated confidence level where differences are identified. Idaho Power incorporated Hendrickson's proposed adjusted NCF's, as applicable, into the models for the wind and solar resource types, as part of the final shortlist selection process.

#### **B. AURORA Modeling Scenarios**

The Company created the following eight AURORA scenarios used to help develop the final shortlist. The eight scenarios were created to capture a range of B2H online dates, natural gas price futures, carbon price futures, large load demand futures,

and revised Environmental Protection Agency (EPA) carbon emissions rules on potential new gas fired power plants. These scenarios were discussed and developed with the IE and Staff prior to their use in final shortlist modeling. Projects selected across the eight AURORA scenarios were considered for inclusion on the final shortlist. Below is a brief description of the assumptions included with each scenario. For further information regarding the AURORA modeling process, see Confidential Attachment 2 – AURORA Modeling.

### **Scenario #1 – Base**

The ‘Base’ AURORA scenario is consistent with the general base assumptions used in the acknowledged 2023 IRP with the addition of the Southwest Intertie Project – North transmission line (SWIP-North). In this scenario, B2H is assumed to be online before 2028, and includes a November 2028 commercial operation date (COD) for SWIP-North. As stated in the 2023 IRP, Idaho Power analyzed SWIP-North as providing a 500 MW resource equivalent capacity from the Desert Southwest market in the winter months. This winter capacity benefit begins in November 2028.

### **Scenario #2 – Base + Alternate B2H COD**

The ‘Base + Alternate B2H COD’ AURORA scenario is consistent with the general base assumptions used in the acknowledged 2023 IRP, with the addition of SWIP-North. In this scenario, a 2029 online date is assumed for B2H as well as a 2029 online date for SWIP-North and is intended to assess how alternate transmission line online dates would affect the Company’s resource needs in 2028.

### **Scenario #3 – High Gas Price + High Carbon Price**

The ‘High Gas Price + High Carbon Price’ AURORA scenario is consistent with the general base assumptions utilized in Idaho Power’s acknowledged 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028 and includes a November 2028 online date for SWIP-North. The same SWIP-North assumptions described in Scenario #1 were utilized. This scenario also utilizes a high natural gas price forecast and high carbon price forecast as noted below:

- [Natural Gas Price Forecast](#)<sup>12</sup> – EIA Low Oil and Gas Supply (2023 Annual Energy Outlook)
- Carbon Price Adder Forecast – Social Cost of Carbon, Methane, and Nitrous Oxide, Interim Estimates under Executive Order 13990

### **Scenario #4 – Low Gas Price + Zero Carbon Price**

The ‘Low Gas Price + Zero Carbon Price’ AURORA scenario is consistent with the general base assumptions utilized in the Company’s acknowledged 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028 and includes a November 2028 online date for SWIP-North. The same SWIP-North assumptions described in Scenario #1 were utilized. This scenario also utilizes a low natural gas price forecast and zero carbon price forecast as noted below:

- [Natural Gas Price Forecast](#)<sup>13</sup> – EIA High Oil and Gas Supply (2023 Annual Energy Outlook)
- Carbon Price Adder Forecast – Consistent Zero Dollars per Ton

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<sup>12</sup> <https://www.eia.gov/outlooks/aeo/>

<sup>13</sup> <https://www.eia.gov/outlooks/aeo/>

### **Scenario #5 – Large Load – 100 MW**

The ‘Large Load – 100 MW’ AURORA scenario is consistent with the general base assumptions utilized in Idaho Power’s acknowledged 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028, and includes a November 2028 online date for SWIP-North. The same SWIP-North assumptions described in Scenario #1 were utilized. Additionally, the ‘Large Load – 100 MW’ AURORA scenario load forecast is increased above the base load forecast to reflect an additional large load, causing an incremental 100 MW peak capacity need in 2028 when compared to the base case.

### **Scenario #6 – Large Load – 200 MW**

The ‘Large Load – 200 MW’ AURORA scenario is consistent with the general base assumptions utilized in the Company’s acknowledged 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028, and includes a November 2028 online date for SWIP-North. The same SWIP-North assumptions described in Scenario #1 were utilized. Additionally, the ‘Large Load – 200 MW’ AURORA scenario load forecast is increased above the base load forecast to reflect an additional large load, causing an incremental 200 MW peak capacity need in 2028 when compared to the base case.

### **Scenario #7 – Large Load – 100 MW With EPA Emissions Rule**

The ‘Large Load – 100 MW With EPA Emissions Rule’ AURORA scenario is consistent with the general base assumptions utilized in acknowledged Idaho Power’s 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028, and includes a November 2028 online date for SWIP-North. The same



SWIP-North assumptions described in Scenario #1 were utilized. Additionally, the ‘Large Load – 100 MW With EPA Emissions Rule’ AURORA scenario load forecast is increased above the base load forecast to reflect an additional large load, causing an incremental 100 MW peak capacity need in 2028 when compared to the base case. This scenario also models the recently revised Clean Air Act section 111(d) carbon emissions rules on potential new natural gas fired power plant project submittals.

### **Scenario #8 – Large Load – 200 MW With EPA Emissions Rule**

The ‘Large Load – 200 MW With EPA Emissions Rule’ AURORA scenario is consistent with the general base assumptions utilized in the Company’s acknowledged 2023 IRP with the addition of SWIP-North. In this scenario, B2H is assumed to be online before 2028, and includes a November 2028 online date for SWIP-North. The same SWIP-North assumptions described in Scenario #1 were utilized. Additionally, the ‘Large Load – 200 MW With EPA Emissions Rule’ AURORA scenario load forecast is increased above the base load forecast to reflect an additional large load, causing an incremental 200 MW peak capacity need in 2028 when compared to the base case. This scenario also models the recently revised Clean Air Act section 111(d) carbon emissions rules on potential new natural gas fired power plant project submittals.

The projects selected at least once across the eight AURORA scenarios and considered for inclusion on the final shortlist are shown below in *Table 4 - Projects Selected in AURORA Modeling Scenarios*.

Table 4: Projects Selected in AURORA Modeling Scenarios

<b>Delivery Year</b>	<b>Bidder/Project</b>	<b>Resource</b>
<b>2028</b>		178.6 MW Wind
		330 MW Solar
		400 MW Solar
		80 MW Solar
		149 MW Solar
		150 MW BESS
		200 MW BESS
		110 MW Gas + 110 MW BESS

All projects selected from the eight AURORA scenarios were moved forward and included in the final shortlist.

**C. Final Shortlist Portfolio Sensitivities**

After the final shortlist was derived from the AURORA scenarios described above, Idaho Power performed a portfolio sensitivity analysis on the aforementioned final shortlisted projects. The intention of the portfolio sensitivity process is to assess the various mixes of final shortlisted projects and how their impacts to portfolio costs compare to each other in potential variable futures. This sensitivity analysis informs the comparative ranking of final shortlist projects to each other.

The ‘Base’ scenario assumptions were used as the basis for final shortlist portfolio sensitivity modeling. The Company is working with the SWIP-North project developer to obtain an interest in 500 MW of south-to-north capacity in the project. If the parties come to an agreement regarding the Company’s participation in SWIP-North, Idaho Power would seek appropriate regulatory review and approval of the necessary definitive agreements reflecting the Company’s interest in the transmission line. With respect to

B2H, the pre-2028 B2H online date was selected as this is the most recent projection of B2H's online date.

More details and results of the final shortlist portfolio sensitivity analysis was provided to LEI and can be found in LEI's Closing Report on the 2028 RFP included as Confidential Attachment 1.

## **IX. CONTRACT NEGOTIATION STRATEGY**

Idaho Power plans to contact all bidders whose projects are on the final shortlist after filing this request for acknowledgement to inform them of their inclusion on the list and offer draft contracts. As contract discussions progress, the Company will prioritize negotiation efforts with the bids that ranked highest on the final shortlist. As time allows or as circumstances change with the higher-ranked projects, Idaho Power will then proceed with negotiations with lower-ranked projects.

In the course of contract negotiations with projects on the final shortlist, various deal parameters may be subject to change, with mutual agreement of the parties. Certain components of the transaction may not have been addressed in the bid proposals and other components may ultimately vary somewhat from what was initially proposed or identified in the final shortlist based on the overall negotiation, potential changed circumstances, and economic opportunity. 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.

## **X. COMPLIANCE WITH THE RULES**

### **A. OAR 860-089-0100 Applicability of Competitive Bidding Requirements**

OAR 860-089-0100 requires an electric company issue an RFP for all major resource acquisitions with durations greater than five years and quantities greater than 80 MW. The Company's filing in this case, based on its 2023 IRP resource needs, which has since been acknowledged, called for the acquisition of a combination of capacity and energy resources that provide a minimum of approximately 138 MW of incremental peak capacity and 555 MW of supply-side resource additions in 2028. The 2028 RFP solicited bids intended to fulfill this energy or capacity need incrementally to its system beginning April 1, 2028, and beyond. As discussed in this filing, Idaho Power's development and issuance of the 2028 RFP satisfies OAR 860-089-0100.

### **B. OAR 860-089-0200 Engaging an Independent Evaluator**

As described in OAR 860-089-0200, prior to issuing an RFP, the electric company must engage the services of an IE. The IE will oversee the competitive bidding process to ensure it is administered fairly and in accordance with the competitive bidding rules. The Company filed a request on February 29, 2024, to (1) approve the selection of LEI as the IE to oversee the 2028 RFP process, the IE approved for Idaho Power's 2026 All-Source RFP. The Commission adopted Staff's recommendation and approved LEI as the IE on April 30, 2024 (later memorialized through Order No. 24-120).

**C. OAR 860-089-0250 Design of Request for Proposals**

As part of the request for approval of LEI as the IE filed on February 29, 2024, Idaho Power also requested approval of the scoring and methodology to be utilized for the 2028 RFP and for approval of the draft 2028 RFP, in accordance with OAR 860-089-0250. The Company held an introductory workshop on May 14, 2024, to present Idaho Power's resource need, introduce the draft 2028 RFP and scoring and modeling methodology, and solicit feedback. 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.

On July 29, 2024, Staff filed its recommendation to approve the Company's final 2028 RFP and the associated scoring and modeling methodology, which was followed by the Second IE Assessment Report on August 2, 2024. 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. The Company formally issued the 2028 RFP, with the Commission's modification, on August 16, 2024.

**D. OAR 860-089-0300 Resource Ownership**

Under OAR 860-089-0300, an electric company may submit bids in response to its RFP, which must be treated in the same manner as other bids. Idaho Power submitted benchmark bids into this 2028 RFP and took precautions to ensure that the benchmark development and bid process was kept distinctly separate from the development of the 2028 RFP, evaluation of bids, or scoring of bids, consistent with OAR 860-089-0300. The

Company prepared a personnel list of Idaho Power employees who were assigned to either the Internal Bid Team or the Evaluation Team and shared that list with the IE to demonstrate the clear separation of functions.

Under OAR 860-089-0300, the electric company may make elements of the benchmark resource owned or secured by the electric company available for use in third-party bids, and if not made available, the electric company must provide analysis explaining that decision. All elements owned or secured by the benchmark bid team were outlined and noted in Exhibit P of the 2028 RFP, which is posted publicly on Idaho Power's Request for New Resources webpage.<sup>14</sup>

Under OAR 860-089-0300(5), the electric company must allow independent power producers to submit bids with and without an option to renew and may not require that bids include an option for transferring ownership of the resource. The 2028 RFP allowed for these options as outlined in the "Proposal Specifications" section on pages 9 to 13 of the main 2028 RFP document.

**E. OAR 860-089-0350 Benchmark Resource Score**

OAR 860-089-0350 directs that prior to the opening of bidding on an approved RFP, the Company must file with the Commission and submit to the IE, for review and comment, a detailed score for any benchmark resource with supporting cost information, any transmission arrangements, and all other information necessary to score the benchmark resource. As part of this 2028 RFP, Idaho Power applied the same

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<sup>14</sup> [https://docs.idahopower.com/pdfs/AboutUs/businessToBusiness/2028\\_IPC\\_AllSource\\_RFP.pdf](https://docs.idahopower.com/pdfs/AboutUs/businessToBusiness/2028_IPC_AllSource_RFP.pdf)

assumptions and bid scoring and evaluation criteria to the benchmark bid that are used to score other bids consistent with OAR 860-089-0350.

The Company made the filing required under OAR 860-089-0350(1)-(3) on August 28, 2024, before opening 2028 bids submitted as part of the 2028 RFP. In accordance with the 2028 RFP design and as required by Commission rules, Idaho Power did not open bids for review and scoring until the benchmark bid scores were filed. No updates have been made to the benchmark scores other than the opportunity to provide best and final offer price updates, consistent with the opportunity offered simultaneously to all other 2028 bids in the 2028 RFP.

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

OAR 860-089-0400 states that the utility must provide all proposed and final scoring criteria and metrics in its draft and final RFPs filed with the Commission. The scoring of bids and selection of the initial shortlist must be based on price and non-price factors with non-price factors converted to price factors where practicable. As explained earlier, the Company complied with this rule through its stakeholder process preceding Commission approval of the 2028 RFP.

Idaho Power's 2028 RFP initial shortlist of 2028 bids was identified using both price and non-price scoring. Non-price scoring was based on the following factors: 1) contracting progress and viability, and 2) project readiness and deliverability. The Company converted all non-price criteria that were better suited as minimum requirements to the "minimum bidder requirements" as outlined in the 2028 RFP documents.

The non-price criteria selected by Idaho Power was based on overall risk and was consistent with the Company's 2023 IRP. The non-price criteria were selected due to their focus on the 2028 capacity shortfall date, contribution to capacity need, ability to procure transmission, and providing a least-risk option for the Company's customers. Idaho Power took steps to ensure that the non-price criteria was reasonably able to be self-scored by potential bidders.

The Company's price scoring was consistent with 2023 IRP analysis as it used the same economic models and methodology, with updated financial assumptions, to evaluate system impact and costs associated with each bid.

Per OAR 860-089-0400(6), the IE had full access to all price and non-price scoring, including any production models, cost models, and sensitivity analyses.

#### **G. OAR 860-089-0450 Independent Evaluator Duties**

Consistent with OAR 860-089-0450(1), the IE oversaw the 2028 RFP process to ensure it was conducted fairly, transparently, and properly. The IE participated in review meetings, workshops, and filed assessments as part of the 2028 RFP structure process. The IE attended the pre-RFP workshop focusing on scoring methodology and the draft 2028 RFP. Consistent with OAR 860-089-0450(3), the IE consulted with Idaho Power during the Company's preparation of the draft 2028 RFP and filed its assessment of the final draft 2028 RFP to the Commission. The IE also reviewed the financial inputs to the evaluation models and reviewed final scoring and evaluation criteria.

In accordance with OAR 860-089-0450, the IE had access to all Idaho Power scoring documents and models, was included on communications as the Company sought additional information and clarification from bidders, scored all benchmark bids,



and was consulted as Idaho Power determined bidder conformance and selected the initial and final shortlists. The IE separately evaluated and scored the Company's benchmark bids. The IE also reviewed all bids to ensure conformance with the 2028 RFP's identified requirements, reviewed all correspondence between bidders and the Evaluation Team, and reviewed all memoranda sent to bidders of non-complaint bids. The IE independently scored all bids to determine whether the selections for the initial and final shortlists were consistent with the bid evaluation criteria and compared the results of the IE's scoring with Idaho Power's scoring to determine whether the Company's scoring of the 2028 bids and selection of the initial and final shortlists were reasonable. The IE prepared a Closing Report on the 2028 RFP for the Commission after Idaho Power selected the final shortlist, providing the IE's assessment of the solicitation process and the IE's involvement, including detailed bid scoring and evaluation results. The IE Closing Report on the 2028 RFP is included in this filing as Confidential Attachment 1.

Under OAR 860-089-0450(6), the IE must "evaluate the unique risks and advantages associated with any company owned resources (including but not limited to the electric company's benchmark), and may apply the same evaluation to third-party bids," including an evaluation of certain issues. The IE discusses these factors as part of the Closing Report on the 2028 RFP, stating: "As IE, LEI attests to the reasonableness of IPC's approach in identifying bids for the final AS RFP shortlist. The process was conducted with the utmost fairness and impartiality, upholding the integrity of the selection process."

Under OAR 860-089-0450(7), the IE reviews the reasonableness of any score submitted by Idaho Power for a benchmark resource and once the Company and the IE have both scored and evaluated the competing bids and any benchmark resource, the IE and Idaho Power must file their scores with the Commission. The IE and Company must compare results and attempt to reconcile and resolve any scoring differences. Here, as discussed above, the IE reviewed scores submitted by Idaho Power for the benchmark bids, summarizing the reconciliation in the September 16, 2024, Benchmark Bids report, prior to the Evaluation Team opening the third-party bids on September 17, 2024.

Under OAR 860-089-0450(8), the IE is required to review the Company's sensitivity analysis of the bid rankings required under OAR 860-089-0400 and file a written assessment with the Commission before Idaho Power requests acknowledgment of the final shortlist. Here, the Company provided its sensitivity analysis of the bid rankings to the IE on December 10, 2024, and on January 10, 2025, the IE filed its written assessment in the IE Closing Report on the 2028 RFP.

#### **H. OAR 860-089-0500 Final Shortlist Acknowledgement**

Idaho Power's final shortlist of 2028 bids is consistent with the 2023 IRP Action Plan and Idaho Power seeks acknowledgment of the final shortlist. The Company requests Commission acknowledgment of this final shortlist of 2028 bids by April 1, 2025, to enable Idaho Power to timely finalize negotiations with final shortlist bidders and ensure projects are online by the required April 1, 2028, commercial operation date.

OAR 860-089-0500 directs utilities to request acknowledgement of the final shortlist before negotiations may begin with bidders. "Acknowledgement" is defined as "finding by the Commission that an electric company's final shortlist of bid responses

appears reasonable at the time of acknowledgment and was determined in a manner consistent with the rules in this division.”

In accordance with OAR 860-089-0500, the Company’s request for acknowledgement includes the IE’s Closing Report on the 2028 RFP (attached), which includes Idaho Power’s final shortlist of responsive 2028 bids, the sensitivity analyses performed, and a discussion of the consistency between the final shortlist and the Company’s last acknowledged IRP Action Plan, the 2023 IRP Action Plan. Consistent with this rule, Idaho Power will begin contract negotiations with bidders after filing this request for acknowledgment.

## **XI. ATTACHMENTS**

The following documents are attached to this filing and incorporated herein by this reference.

*Confidential Attachment 1 – LEI Closing Report on the 2028 RFP*

*Confidential Attachment 2 – AURORA Modeling*

## **XII. CONCLUSION**

The Commission’s acknowledgment of Idaho Power’s final shortlist of 2028 bids will enable the Company to secure long-term value for customers, filling the 2028 capacity shortfall identified in the 2023 IRP process. Idaho Power is committed to continuing to provide safe, reliable, affordable, and increasingly clean electricity to our customers. The 2028 bids submitted under the 2028 RFP indicate robust participation and provided the Company a competitive selection process. The final shortlist of 2028 bids included in this Request represents resources with the best combination of cost and risk for customers to implement the 2023 IRP Action Plan.

DATED: January 10, 2025.

**MCDOWELL RACKNER GIBSON PC**



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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

UM 2317

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Attachment 1

LEI Closing Report on the 2028 RFP

**CONFIDENTIAL**

January 10, 2025

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

UM 2317

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Attachment 2

AURORA Modeling

**CONFIDENTIAL**

January 10, 2025

## CERTIFICATE OF SERVICE

I certify that on this January 10, 2025 a true and correct copy of the Idaho Power Company's **CONFIDENTIAL Request for Acknowledgment of Final Shortlist of Bidders in the 2028 All-Source Request for Proposals** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated January 10, 2025.

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