ITEM NO. 1

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: August 15, 2024

REGULAR X **CONSENT** ____ **EFFECTIVE DATE** N/A

DATE: July 29, 2024

TO: Public Utility Commission

FROM: Will Mulhern

THROUGH: JP Batmale and Kim Herb **SIGNED**

SUBJECT: IDAHO POWER COMPANY: (Docket No. UM 2317)
Application for Approval of the 2028 All-Source RFP Scoring and Modeling Methodology and RFP Final Draft.

STAFF RECOMMENDATION:

1. Approve Idaho Power Company's Scoring and Modeling Methodology (SMM), subject to the conditions outlined in this memo.
2. Approve Idaho Power Company's Final Draft of the 2028 All-Source Request for Proposals, as filed by the Company on July 16, 2024, subject to the conditions outlined in this memo.

DISCUSSION:

Issue

1. Whether the Commission should approve Idaho Power Company's (IPC or Company) SMM, with or without conditions.
2. Whether the Commission should approve IPC's Final Draft of the 2028 All-Source (AS) Request for Proposals (RFP) with or without conditions.

Applicable Rule or Law

The Commission's Competitive Bidding Requirements (CBRs) in OAR Chapter 860, Division 89, apply when an electric utility may acquire a resource or a contract for more than an aggregate of 80 megawatts (MW) with a duration of five or more years, as specified in OAR 860-089-0100(1).

Requirements for RFPs are set forth in OAR 860-089-0250. OAR 860-089-0250(2) requires that a draft RFP must reflect the elements, scoring methodology, and associated modeling from a Commission acknowledged IRP.

OAR 860-089-0250(3) specifies that a draft RFP must include minimum bidder requirements, standard form contracts, bid evaluation and scoring criteria, language allowing bidders to negotiation final contract terms, a description of how the utility will share information, the bid evaluation and scoring criteria for the selection of the shortlist, the alignment of the needs addressed by the RFP with an identified need from an acknowledged IRP, and the impact of any multi-state regulation on the development of the RFP.

Under OAR 860-089-0250(2)(a), when a utility that does not have a Commission-acknowledged IRP in which the RFP design, scoring methodology, and associated modeling was included, the utility must develop and file for approval a proposal for scoring methodology and associated modeling prior to preparing a draft RFP.

OAR 860-089-0250(3)(g) requires that the RFP at minimum include the alignment of the electric company's resource need addressed by the RFP with an identified need in an acknowledged IRP or subsequently identified need or change in circumstances with good cause shown.

Under OAR 860-089-0250(5), the Commission may approve an RFP with any necessary conditions if the Commission finds the RFP meets the requirements of the CBRs and will result in a fair and competitive bidding process.

Analysis

Background
On February 29, 2024, Idaho Power Company filed notice of the commencement of the process for a 2028 All-Source (AS) Request for Proposals (RFP), including a request to approve the draft SMM and a draft of its RFP.[1]

[1] Docket No. UM 2317, Idaho Power Company, Application for Approval of the 2028 All-Source Request for Proposals to Meet 2028 Capacity Resource Need, February 29, 2024 (*hereinafter* Application).

At a public meeting on April 30, 2024, the Commission approved waivers to competitive bidding rules OAR 860-089-0200 (1) and (2) and OAR 860-089-0250(2)(a) to allow Idaho Power to retain London Economics International (LEI) as the Independent Evaluator (IE) for the 2028 AS RFP and to allow concurrent review of the SMM and RFP.[2]

LEI filed its initial report on the RFP on May 28, 2024. Staff, the Northwest Intermountain Power Producers Coalition (NIPPC), and Renewable Northwest (RNW) filed comments on the Initial Draft RFP on June 3, 2024. IPC filed an Updated Draft RFP with its Reply Comments on June 10, 2024, and Key Capture Energy filed comments on June 17, 2024.

Because large portions of the RFP were the same as what was approved in the 2026 RFP, Staff has attempted to conduct a streamlined analysis of this RFP. Accordingly, Staff has focused its analysis on substantive changes to the RFP, as outlined in the April 30, 2024 public meeting Staff Report, and other issues raised by Stakeholders and the IE during the RFP review process.[3]

Since IPC filed its initial RFP draft, Staff has worked with Stakeholders, the IE, and the Company to resolve several issues raised during the process. Staff appreciates the Company's responsiveness to feedback and willingness to address issues raised in the RFP process. This process resulted in the Company publishing a Final Draft RFP and SMM on July 16, 2024. Staff's analysis in this report focuses on the Final Draft RFP. Versions of the RFP are referenced as listed in Table 1.

Table 1 – RFP Draft versions referenced in the Staff Report

RFP Name	Date	Notes
Initial Draft RFP	May 17, 2024	Submitted following stakeholder workshop.
Updated Draft RFP	June 10, 2024	Submitted with IPC Reply Comments.
Final Draft RFP	July 16, 2024	Current version, analyzed in Staff Report.

Summary of key draft RFP and changes to date:

- Revisions based on Staff and stakeholder opening comments, most issues were addressed in IPC's Reply Comments and in the subsequent Draft Final RFP. See details in Attachment A.
- Inclusion of one additional 2028 benchmark project with Commercial Operation Date (COD) of April 2028, bringing the total to four and reflecting 644 MW of capacity. All benchmark bids are Battery Energy Storage (BESS) projects.
- Significant modifications to accommodate consideration of bids meeting interconnection criteria but with later CODs, and those with 2029 and later CODs.

[2] Docket No. UM 2317, Order No. 24-120, May 2, 2024.
[3] *Id*.

In this report, Staff discusses outstanding issues from its comments as well as additional issues raised by stakeholders following Staff's opening comments. Recommended conditions of approval are presented where appropriate. Attachment A includes a table specifying Staff and the IE's recommendations in opening comments and how they were addressed by IPC.

Staff Analysis of Scoring and Modeling Methodology (SMM)

The SMM for the 2028 AS RFP is similar to what was approved in the 2026 AS RFP. Staff appreciates Idaho Power using a similar SMM to the 2026 AS RFP and incorporating the conditions of approval for the 2026 AS RFP in the 2028 AS RFP.

Staff also provides analysis of three changes from the 2026 AS RFP. The most substantial change to the 2028 SMM is Idaho Power's inclusion of an eligibility criteria related to a bidder's interconnection status. In the June 10 Updated Draft RFP, the Company added Exhibit R, which created a separate process for bidders who do not meet the interconnection requirement as initially proposed. Staff worked with stakeholders and the Company to revise this exhibit. The analysis below reflects these revisions, as presented in the July 16 Final Draft RFP. The second is the treatment of tax credits that can be sold on secondary markets as a result of the Inflation Reduction Act, and the third is the treatment of ERIS and NRIS bids.

2029 and Later COD and Interconnection Requirement

In the May 17, 2024 Initial Draft RFP, Idaho Power included a new bid eligibility requirement stating bidders must provide "Evidence that the Bidder's proposal has a Generator Interconnection Agreement (GIA) ***or*** a Generator Interconnection application in either the IPC Serial Study Process or the Transitional Cluster Study Process."[4] This "GIA requirement" was added to reflect IPC's new transmission interconnection processes, resulting from FERC Order No. 2023, and intended to mitigate potential delays in delivery caused by projects encountering unexpected constraints and costs when subject to a full transmission study.[5] Additionally, Idaho Power stated it had a "preference" for bids with 2028 CODs but would accept and evaluate bids with later CODs.[6]

Staff, Stakeholders, and the IE all requested further clarification noting that the interconnection requirement could limit the number of bidders eligible to participate in the RFP and the lack of clarity around the company's preference made it difficult to understand how bids with 2028 CODs would be evaluated against those with later CODs, which could lead to utility bias.

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[4] Docket No. UM 2317, Idaho Power's 2028 All-Source Request for Proposals Final Draft, Exhibit C, p. 39, May 17, 2024 (*hereinafter* Initial Draft RFP).
[5] *Improvements to Generator Interconnection Procs. & Agreements*, Order No. 2023-A, 186 FERC ¶ 61 (2024) available at FERC Order 202 https://www.ferc.gov/media/order-no-2023.
[6] Initial Draft RFP, May 17, 2024, p. 9.

In response to this feedback, IPC's Reply Comments included an updated RFP with significant additional details and proposed a process for considering bids with later CODs. This new process ultimately creates three groups of bids that can be submitted through the 2028 AS RFP process:

1. Bids that meet the GIA requirement and can deliver by April 1, 2028 ("2028 GIA Eligible").
2. Bids that meet the GIA requirement but cannot deliver by April 1, 2028 ("2029 GIA Eligible").
3. Bids that do not meet the GIA requirement ("Exhibit R Eligible").

The Company made changes to Section 7.2 of the Final Draft RFP to reflect these changes. It also included Exhibit R, which specifies the eligibility requirement for bids that do not meet the GIA requirement. Table 3 outlines the three types of bids and the relevant differences for each group.

Table 3 – Eligible bid groups in the 2028 AS RFP.

<table>
<tr><th></th><th colspan="2">Group 1</th><th>Group 2</th></tr>
<tr><th></th><th>2028 GIA Eligible</th><th>2029 GIA Eligible</th><th>Exhibit R Eligible</th></tr>
<tr><td>COD</td><td>April 1, 2028</td><td>Later than April 1, 2028.</td><td>Later than April 1, 2028.</td></tr>
<tr><td>GIA Requirement</td><td colspan="2">Evidence of an active Generator Interconnection Agreement or Generator Interconnection application is required.</td><td>Not required. Proposals intend to enter the cluster study process in March 2025.</td></tr>
<tr><td>Timeline</td><td colspan="2">Evaluated on the schedule proposed in Section 2.8 of the Draft Final RFP.</td><td>Evaluated on the schedule proposed in Exhibit R of the Draft Final RFP.</td></tr>
<tr><td>Capacity</td><td>128 MW of incremental peak capacity

555 MW of supply-side resource additions</td><td colspan="2">511 MW of incremental peak capacity

1,190 MW of supply-side resource additions</td></tr>
</table>

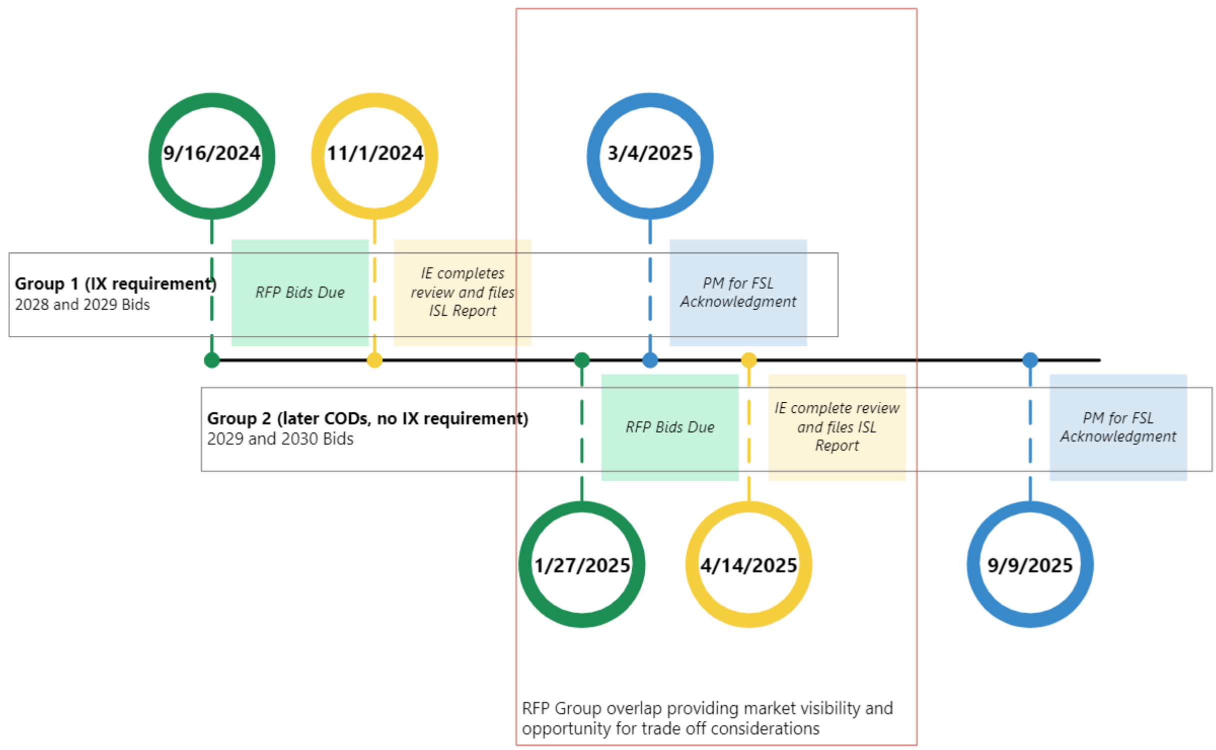
Schedule

This proposed change would modify the schedule and effectively separate the RFP as considered in this docket into two separate but overlapping bid evaluation processes. A draft combined scheduled as proposed by Staff is provided in Attachment A. The first process, Group 1 in Table 3, would proceed along the timeline initially proposed by the Company, specified in Section 2.8 of the Final Draft RFP, and would largely mirror the process used in the 2026 AS RFP. This would involve IPC evaluating proposals and using the 2028 GIA Eligible pool to fill the identified Summer 2028 deficit need 138 MW of incremental peak capacity and 555 MW of supply-side resource additions.[7] After the stated need is filled, the Company will consider other eligible bids that meet the interconnection requirement (2029 GIA Eligible bids) resulting in an Initial Shortlist and Final Shortlist that meets the Company's 2028 capacity need and includes competitive bids with CODs in 2029. The Company was not explicit in the 2028 RFP, or Exhibit R, about the capacity needs that might be filled with bids with CODs beyond 2029. However, Staff notes that the need filled by bids with 2029 CODs could be supported by the capacity need documented in the 2023 IRP for 2029 - 2030. This need includes 511 MW of incremental peak capacity and 1,190 MW of supply-side resource needs.[8]

The second timeline would evaluate Exhibit R Bids and develop a separate ISL and FSL consisting of bids with later CODs (for example, a bid with a 2030 COD) that do not meet the interconnection requirement. This gives bidders the opportunity to put together bids that do not need to be in the current interconnection queue to support COD feasibility. This allows for the inclusion of long lead-time resources that support the incremental capacity needs for 2029 and 2030 documented in the 2023 IRP. This later timeline is intended to provide these bidders more time to assemble and submit bids that would not have been eligible based on the criteria in the Initial Draft RFP. Figure 1 provides a visual representation of these two timelines.

[7] Docket No. UM 2317, Idaho Power Company's Updated Final Draft 2028 All-Source Request for Proposals, July 16, 2024, p. 7.
[8] Docket No. LC 84, Idaho Power Company's 2023 Integrated Resource Plan, September 29, 2023, pp. 146, 174.

Figure 1 – Key dates of proposed RFP schedules



Crucially, as noted in the figure above, these two timelines overlap in early 2025. 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.

The outcome would be two ISLs and two FSLs, with the ISL and FSL developed as part of the second process being informed by the shortlists selected through the first process.

Stakeholder feedback
Staff met with NIPPC who was generally supportive of this approach and saw it as a feasible solution for allowing bidders who do not meet the interconnection requirement to still participate in the 2028 RFP. NIPPC emphasized the importance of the RFP clearly stating and justifying the 2028 capacity volume the Company is seeking to procure, so as not to unnecessarily advantage 2028 bids over bids with later CODs.

Staff analysis
Staff commends IPC for its willingness to incorporate this feedback into its revised Draft RFP and to develop a solution for pursuing long lead-time resources while also addressing its 2028 needs. Staff also appreciates the Company's responsiveness to questions and feedback and that IPC is using a process that largely mirrors what was used in the 2026 AS RFP to fill its immediate need while adding Exhibit R to address concerns about bids that would not meet the GIA requirement.

Staff is generally comfortable with how the approach is specified within Section 7.2 of the RFP and in Exhibit R. Staff believes this approach:

1. Addresses concerns about the interconnection requirement, which would have otherwise limited the pool of eligible bidders.
2. More clearly specifies how bids with CODs beyond 2028 will be considered.
3. Allows the company to consider tradeoffs between a higher priced bid that can be online by April 2028, and a lower priced bid that would not be online until 2029.

Staff notes that this is a new approach to running an RFP process, but one that is consistent with Oregon's Competitive Bidding Rules. Staff believes it supports the Company's effort to meet a near-term capacity need while identifying the most economical bid opportunities by limiting COD restrictions and overly restrictive interconnection requirements for bids.

This additional process extends the docket and increases the work for the IE and Staff. Staff has confirmed with the IE that they are comfortable with this increased workload. The IE shared with Staff a proposed budget and additional scope of work which Staff found to be reasonable. If the Draft Final RFP is approved, the IE will work with IPC to prepare a revised contract that reflects this additional scope.

Staff also acknowledges that this process creates risks the Company must manage. Staff sees two primary risks created by this approach that it seeks to mitigate with the approval conditions specified in this report:

1. *2028 Capacity Risk:* An actual decrease in the 2028 capacity need could lead to over-procurement of 2028 resources, which could be more expensive than those with later CODs.

2. *Modeling Risk:* Failing to appropriately model a portfolio that compares all three pools of bids to construct a least-cost, least-risk portfolio could result in the Company not realizing the benefits of an expanded bid pool.

Staff provides an analysis of these risks and opportunities for mitigation below.

2028 Capacity Risk

Idaho Power cites an urgent capacity need in 2028 as justification for prioritizing bids with a 2028 COD. This need is documented in the 2023 IRP and is driven largely by projected increases in load growth caused by new large customers in the Company's service territory.[9]

NIPPC has emphasized the importance of the Company justifying its 2028 capacity need to ensure bids addressing the projected 2028 deficit are not unfairly advantaged over bids with later CODs. In its opening comments, NIPPC states that any adjustments to the 2028 capacity need resulting from the IRP process should be reflected in the RFP prior to the selection of a final shortlist.[10]

In the July 2, 2024, Staff Report on the 2023 IRP (Docket No. LC 84), Staff noted an uncertainty of the timing and volume of this new load growth.[11] Further, Staff pointed out that the Valmy conversions by 2026 selected in the Preferred Portfolio made the Company capacity long by 284 MW in 2027.[12] While this position was possibly transitory and preferable to being short in 2027 and into 2030, it does raise questions around the urgency of the 2028 capacity need.[13]

As stated in LC 84, Staff is sensitive to the uncertainty around the Company's available capacity and the volatility of capacity in the Western Electricity Coordinating Council (WECC). Staff supports Idaho Power pursing incremental capacity to meet the projected 2028 capacity need and thus is comfortable moving forward with this RFP to meet this need. However, Staff believes the volatility associated with this capacity need creates an opportunity for utility bias in the procurement process that warrants oversight. Staff's concern arises with the consideration and treatment of bids with CODs able to meet the Summer 2028 as compared to those with CODs shortly after. Specifically, Staff seeks to ensure that IPC does not over-procure bids with 2028 CODs in order to meet a capacity deficit that may not materialize.

Staff understands Idaho Power's projected need and recognizes the risks associated with failing to add the capacity necessary to meet this need by Summer of 2028. However, Staff believes that to secure resources economically it is important that the Summer 2028 capacity be as low as reasonably possible

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[9] Docket No. LC 84, Idaho Power Company 2023 Integrated Resource Plan, September 28, 2023.

[10] Docket No. UM 2317, NIPPC's Comments on Draft RFP, June 3, 2024, p. 11 (*hereinafter,* NIPPC Comments on Draft RFP).

[11] Docket No. LC 84, Staff Report for the July 30, 2024, Special Public Meeting, p. 21, July 2, 2024.

[12] *Id.*, p. 14.

[13] *Id.*, pp. 21 – 23.

and should reflect the best information available. Staff agrees with NIPPC that any adjustments must be made prior to the selection of a final shortlist to avoid unfairly preferencing bids with 2028 CODs.

Staff reiterates its recommendation in its Opening Comments that any changes to the 2028 capacity need be well-supported, published to the docket, and shared with bidders. Further, the Company should adjust its 2028 capacity volumes to reflect the most recent modeling before selecting a final shortlist. Staff also recommends the Company conduct sensitivities testing varying levels of 2028 capacity need when conducting modeling for the Final Shortlist. In particular, Staff would like a sensitivity that helps shed light on the financial impact of procuring more capacity than is needed by Summer of 2028. Staff's primary concern is that an artificially high capacity need for Summer 2028, combined with interconnection cluster study participation deadlines that eliminated otherwise economic third-party bidders, could result in the procurement of a high number of expensive benchmark bids that reflect a price premium due to interconnection status and summer 2028 COD.

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.

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.

Modeling Risk

Given the overlapping RFP processes, there is a risk the Company fails to appropriately model a portfolio that considers bids from all bid pools in developing each of the initial and final shortlists. This would negate the benefits of the multi-bid pool process being proposed in this RFP.

Idaho Power has clarified that continuous modeling iterations are part of its standard processes, and it will update its portfolio as appropriate to ensure it is selecting economical bids while meeting its stated capacity need. Further, Staff notes that selection of an FSL does not guarantee a particular resource will be built. Given the length of the negotiation process, the Company will have the opportunity to walk away from a bid selected in the FSL for the initial group and pursue opportunities in the second group that may present better opportunities for the Company and its ratepayers.

To address this risk, Staff asks IPC to ensure it considers bids from all three pools when developing the first FSL, consisting of bids that meet the GIA requirement (Group 1 in Table 2 above). The Company should share modeling results that reflect portfolios constructed with bids selected from multiple pools. The Company should also provide justification for any bids selected to the FSL that is chooses to abandon in favor of bids from the later group. Staff recommends a condition of approval that requires the Company share modeling results reflecting the construction of portfolios that consider bids from all bid pools as appropriate.

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

Tax Credit Transferability Assumptions
The federal Inflation Reduction Act (IRA) permits utilities to transfer Production Tax Credit (PTC) and Investment Tax Credit (ITC) tax credits to other eligible tax-liable entities. [14] Under this new policy, utilities will be able to sell eligible tax credits in secondary markets. Because these markets will not pay the full price for the tax credits, the utility will need to apply a discount rate when modeling the value of these tax credits in the RFP.[15]

Stakeholder feedback
NIPPC raised the issue of tax benefit modelling of utility-owned resources in its opening comments, where it recommended the Company make available assumptions regarding tax benefits modeling for utility-owned resources. NIPPC also requested these assumptions through discovery and noted the risks of incorrect assumptions for tax credit transferability are unique to utility-owned bids because PPAs and BSAs incorporate these assumptions into their fixed price bids.[16]

The Company responded in its Reply Comments that, depending on the outcome of the 2026/2027 RFP negotiations, it may need to investigate the potential of selling tax credits from the 2028 RFP and estimated the current market for selling Investment Tax Credits (ITCs) is in the 90 cents to 95 cents on the dollar range while Production Tax Credits (PTCs) are selling in the 95 cents to 96 cents range on the dollar.[17] The Company also replied to NIPPC's Discovery Request, providing the same information it presented in its Reply Comments.[18]

Staff analysis
Staff agrees with NIPPC that it is important these assumptions are made available and scrutinized by Staff, stakeholders, and the IE. Staff acknowledges that the value of these tax credits in secondary markets is not well-established and it is difficult for the Company or stakeholders to estimate an exact discount rate.

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[14] Inflation Reduction Act of 2022, PL 117-169, August 16, 2022, 136 Stat 1818; *see also*, Internal Revenue Service, Elective Pay and Transferability, https://www.irs.gov/credits-deductions/elective-pay-and-transferability; U.S. White House, Clean Energy Provisions in the Inflation Reduction Act, Clean Energy Tax Provisions in the Inflation Reduction Act | Clean Energy | The White House.
[15] *See e.g.*, Docket No. UM 2274, Staff Report for January 4, 2024, Special Public Meeting, p. 16, December 29, 2023.
[16] NIPPC Comments on Draft RFP, pp. 20-21.
[17] See UM 2317, Idaho Power's Reply Comments, June 10, 2024, p. 6 (henceforth referred to as "IPC Reply Comments").
[18] Idaho Power Company's Supplemental Response to NIPPC's Information Requests No. 4, June 3, 2024.

Staff's main concern is that the Company's discount assumptions will be too low, resulting in utility-owned bids appearing more cost effective than they actually are and causing them to outbid a PPA or BSA that has priced-in these assumptions.

The values proposed by IPC are generally in line with the estimates Staff has seen in other dockets. Accordingly, Staff finds IPCs estimated values to be reasonable.

However, Staff does have an interest in better understanding how these assumptions may influence bid price scores. Accordingly, Staff recommends the IE be directed to work with the Company to develop sensitivity analyses for both the initial and final shortlists that use a range of discount rates for both ITCs and PTCs where applicable. This will provide insight into the threshold at which the discount rate assumption would lead to the selection of a different bid. By including this in the initial shortlist, Staff and the IE will be able to analyze results in their final reports.

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.

ERIS vs NRIS

Idaho Power has included a non-price scoring criteria related to Network Resource Interconnection Service (NRIS). Bidders who have an active interconnection request or completed assessment for NRIS will receive yellow and green scores, respectively, while bidders whose interconnection request is for Energy Resource Interconnect Services (ERIS) receive a red score. This factor makes up 5 percent of the total non-price score.[19]

In addition to its inclusion as a non-price scoring factor, the RFP states "Projects that are seeking to interconnect to IPC's system and have not requested Network Resource Interconnection Service (NRIS) may need additional costs added to account for additional upgrades needed to ensure delivery to load."[20] This means ERIS bids may be assigned additional costs in the bid evaluation process.

When a generator enters an interconnection study, it chooses the type of interconnection service it would like to receive. ERIS and NRIS are the two types of services available for a generator to choose. NRIS provides firm transmission capacity and requires interconnection customers to pay for transmission upgrade costs while ERIS provides non-firm transmission that can be curtailed and does not require the customer to pay upgrade costs.[21]

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[19] IPC Reply Comments, June 10, 2024, p. 9.

[20] Docket No. UM 2317, Idaho Power Company's Updated Final Draft 2028 All-Source Request for Proposals, July 16, 2024, p. 15.

[21] Idaho Power Company, Large Generator Interconnection Procedures (LGIP), Appendix 5 - Standard Large Generator Interconnection Agreement (LGIA), January 1, 2024, pp. 460, 464 at https://docs.idahopower.com/pdfs/BusinessToBusiness/LG_GEN_LGIA.pdf.

Stakeholder feedback
NIPPC and RNW both submitted comments related to this topic. RNW suggested the Company reduce its proposed 5 percent penalty for ERIS bids.[22] In Reply Comments, the Company clarified that while the factor is weighted at 5 percent, the point difference between ERIS and NRIS is only 1.25 points out of the 100 possible points for a bid.[23]

NIPPC did not take issue with the inclusion of the non-price factor, but recommended IPC take additional steps to facilitate the use of ERIS interconnection. It stated that IPC should publish locations expected to have the lowest cost for ERIS interconnection, as it did in the 2026 RFP.[24]

NIPPC also recommended IPC be directed to "consider the likelihood of being able to reduce any new costs for an ERIS bid by dispatching existing resources to accept the power from an ERIS bid and the IE be directed to review this aspect and specifically comment on the reasonableness of any increased costs allocated to ERIS bids in the shortlist report."[25]

Idaho Power opposed RNW and NIPPC's recommendations in its Reply Comments, stating that ERIS interconnection increases the risk that additional network upgrade costs will be identified when the Company submits a transmission service request and having firm transmission service available is critical to ensuring resource availability to reliably serve load.[26] Accordingly, the company believes the 1.25 point penalty to be reasonable.

The Company further clarified in conversations with Staff that it does not believe the locational information provided in the 2026 AS RFP is particularly useful to bidders as bids will not be sited based on this information. Further, it explained that the information is likely to change quickly and may be out of date between it being published with the RFP and bids being submitted.

Staff analysis
Staff agrees with both RNW and NIPPC that ERIS bids can provide flexibility and potential cost-savings to the Company. However, Staff also understands the Company's desire to avoid costly, unforeseen network upgrades that may be associated with an ERIS bid. Staff further notes that because ERIS bids are non-firm, they may not be dispatchable during peak periods when the transmission system is full and thus may not address the Company's incremental capacity need.

Staff believes the 1.25 point penalty currently applied to ERIS bids is reasonable given the certainty that NRIS interconnection provides to the Company. Further, Staff is not convinced that publishing the

[22] Docket No. UM 2317, Renewable NW's Comments, June 3, 2024, p.2.
[23] Docket No. UM 2317, IPC Reply Comments, June 10, 2024, p.9.
[24] NIPPC Comments on Draft RFP, June 3, 2024, pp. 15 – 16.
[25] *Id*.
[26] IPC Reply Comments, p.9, June 10, 2024.

information requested by NIPPC provides meaningful value to bidders, as bidders are not likely to change their bid locations based on this information.

Regarding NIPPC's suggestion that the IE be directed to consider the likelihood of reducing costs of an ERIS bid by examining how resources can be dispatched to accept the bid at a lower cost, Staff agrees in part. Staff believes directing the IE to consider how resources may be dispatched is a grid management issue that exceeds the scope of the IE in an RFP process. However, Staff agrees with NIPPC's recommendation that the IE be directed to comment on the reasonableness of any increased costs allocated to ERIS bids in the initial shortlist report.

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.

Staff Analysis of Draft RFP

Staff finds that IPCs Final Draft 2028 AS RFP, with conditions recommended below by Staff, is compliant with the Commission's Competitive Bidding Rules in OAR Chapter 860, Division 89, that are applicable to this RFP, except as otherwise waived by the Commission.

Staff appreciates the updates the Company has made to the Draft RFP in response to Staff and stakeholder comments. The bifurcated schedule proposed in this RFP requires special consideration of the treatment of benchmark bids to adhere to the Competitive Bidding Rules and avoid utility bias. Staff discusses these considerations below.

Further, as discussed in the Staff Report for the April 30 Public Meeting, treatment of utility-owned bids is an ongoing issue in RFPs that warrants continued analysis and discussion.[27] Below, Staff discusses this issue and recommends a condition related to costs associated with utility-owned bids. Staff also provides analysis below of issues raised by stakeholders related to changing federal solar tariffs and treatment of existing facilities in the 2028 AS RFP.

Submission and Evaluation of Benchmark Bids

Given this, RFP intends to operate with two separate schedules. The Company may wish to submit benchmark bids into both groups being considered in the RFP. Because Oregon's Competitive Bidding Rules stipulate benchmark bids must be scored prior to the start of RFP bidding to "prevent the inspection, review or scoring of non-benchmark bids prior to submission of the benchmark bid score."[28] In response to this, Staff finds it necessary for all benchmark bids, regardless of bid pool, be scored before the first group of bids is opened.[29] This means the proposed date for the initial scoring of benchmark bids and IE benchmark bids report is applicable to all benchmark bids the Company wishes

[27] Docket No. UM 2317, Staff Report for the April 30, 2024, Public Meeting, p. 6, April 24, 2024.
[28] Docket No. AR 600, Staff Final Comments, June 15, 2018, p. 22.
[29] OAR 860-089-0350(1).

to submit, regardless of COD. The Company will then score all benchmark bids, and the IE will publish a single benchmark bids report.

Staff notes that IPC filed an updated Exhibit P – Benchmark Bids on July 25, 2024.[30] This included some information about additional post-2028 benchmark bids the Company is considering submitting, though few details were provided. This submission was in response to Staff's request that the Company include as much information as possible about any potential bids in the Final Draft RFP. Staff did not have the opportunity to analyze these additions prior to the submission of this report. Staff will review this information prior to the Special Public Meeting and looks forward to IPC submitting full bid information for all benchmark bids ahead of the bid deadline.

Staff analysis
Staff recognizes that changing market conditions may necessitate updates to benchmark bids following scoring and before the opening of the second round of RFP bids. Accordingly, Staff will allow IPC to make price updates to benchmark bids before a date specified in the schedule. These price updates will be reviewed by the IE for reasonableness. The IE will report on these price updates in a supplemental report.

Staff recommends a condition of approval that requires the Company to finalize an updated schedule that reflects the benchmark bid process outlined above prior to issuing the RFP. Staff will work with the Company and Stakeholders to develop this schedule ahead of the public meeting. If the RFP and SMM are approved, IPC will publish this schedule with the Final RFP, along with other changes conditioned in this report.

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.

<u>Utility Ownership Risks</u>
Utility-owned bids may face unique cost risks not present in third-party bids. As discussed in the initial Staff Report in this docket, Stakeholders have expressed concern in previous Idaho Power RFPs with the treatment of these risks in the company's evaluation process.[31]

Stakeholder feedback
NIPPC raised the issue of risks unique to utility-owned bids in its opening comments.[32] NIPPC stated it had concerns with how utility ownership bids O&M costs were modeled in the most recent Idaho Power

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[30] Docket No. UM 2317, Idaho Power Company's revised and updated Exhibit P – Benchmark Bids, July 25, 2024.
[31] Docket No. UM 2317, Staff Report for the April 30, 2024, Public Meeting, April 24, 2024, p. 6.
[32] NIPPC Comments on Draft RFP, June 3, 2024, pp. 3 – 6.

RFP (UM 2255). NIPPC cited the IE's initial report from UM 2255 which stated that O&M costs included with Idaho Power's benchmark bids were lower than reputable sources reviewed by the IE.[33]

NIPPC notes that as with UM 2255, this RFP IPC has omitted any requirement for Long Term Service Agreements (LTSAs) and O&M agreements for the life of the resource. NIPPC is concerned that this omission creates risks of overruns for these costs that are not present in utility owned bids, but which PPA and BSA agreements price into their bids.

NIPPC makes two recommendations in its comments to address this issue:[34]

1. The IE perform the analysis requested in UM 2255 in this docket but as part of the ISL report.
2. The Company develop a contingency cost adder for the LTSA costs associated with any utility-ownership bid and the IE evaluate the appropriateness of this cost adder in its report on benchmark bids.

The Company responded in its Reply Comments that it believes it has made reasonable cost assumptions for utility-owned resource bids and NIPPC's recommendation for contingency cost adders lacks support and should not be adopted.

Staff analysis
Staff agrees with NIPPC that the unique risks of utility-owned bids are an ongoing challenge in the RFP process. Similar to the tax credit discount assumption, Staff's concern is that an inappropriately low estimate of O&M and LTSA costs could lead to utility-owned bids being selected to the shortlist in place of third-party bids that have captured LTSA and O&M costs in their bids. This can result in the unfair treatment of third-party bids and create cost risks for ratepayers.

As part of its analysis, the IE is tasked with reviewing the reasonableness of cost assumptions in benchmark bids by comparing these costs to market sources. Staff directs the IE to conduct this analysis as part of its ISL report instead of its final report. This is consistent with the Commission's direction in Order No. 24-120 which directed the IE to identify lessons learned from the previous RFP as a condition of waiver approval.[35]

Further, Staff agrees in part with NIPPC's second recommendation that a cost adder could be useful to reflect risks of utility-owned bids. Based on conversations with the IE, Staff believes there is an opportunity for the Company to better reflect all expected LTSA costs of utility-owned BESS projects. The Company should update LTSA costs in these projects to reflect costs associated with managing the

[33] Docket No. UM 2255, Idaho Power Company's Request for Acknowledgement of Final Shortlist, December 4, 2023, Attachment 1, p. 13.
[34] NIPPC Comments on Draft RFP, June 3, 2024, pp. 3 – 6.
[35] Docket No. UM 2317, Order No. 24-120, May 2, 2024, p. 8.

performance of a battery throughout its lifespan. Specifically, the Company should specify its approach to managing energy storage degradation rates. If the Company intends to take an augmentation approach, in which it adds progressively more energy storage capacity to "maintain" the system performance at its original state throughout the project duration, it should specify the estimated costs associated with this approach. If instead the Company opts for a capacity maintenance agreement that provides a "guaranteed" performance against a targeted degradation rate, through maintenance and replacement of individual modules with under-performing cells, it should state its target degradation rate and specify the costs associated with maintaining this curve. Based on conversation with the IE, this is a feasible and reasonable approach to updating costs. The Company should work with the IE to review and validate the reasonableness of these costs.

RFP Condition No. 2: IPC reflect in LTSA 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.

Federal Solar Tariffs

Stakeholder feedback
NIPPC, RNW, and Key Capture Energy all submitted comments related to changes to tariffs that may affect solar supply chain costs.[36,37,38] RNW specifically pointed out a report indicating that the federal government plans to eliminate a tariff exemption for certain bifacial solar panels and recommended the Company work to align its timing for firm bid pricing and shortlist development with the government's decision-making timeline to ensure accurate bid pricing.[39] NIPPC highlighted the same issue and also references multiple potential supply chain cost increases in the solar and battery storage industry. Key Capture Energy asked about how Section 301 Tariffs will be handled in bid evaluation and recommended tariff impacts be excluded from evaluation until cost impacts are known.

Staff analysis
Staff appreciates Stakeholders' input on this subject and believes it is important that the RFP process is responsive to macroeconomic and supply chain conditions impacting bidders. Based on its Reply Comments and conversations with Staff, Staff believes the Company is committed to accommodating bid pricing changes that may result from changes to solar tariffs and is confident the existing schedule provides adequate opportunities for bid repricing and negotiation. Accordingly, Staff does not believe RFP modifications are necessary to address this issue.

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[36] NIPPC Comments on Draft RFP, June 2, 2024, pp. 19 – 20.
[37] Docket No. UM 2317, Renewable NW's Comments, June 3, 2024, p. 2.
[38] Docket No. UM 2317, Key Capture Energy's Comments, June 17, 2024, p. 1.
[39] See Nichola Groom and Jarrett Renshaw, Reuters, "Exclusive: US plans to restore tariffs on dominant solar technology." April 17, 2024. https://www.reuters.com/world/us/us-plans-restore-tariffs-dominant-solar-technology-sources-say-2024-04-17/.

Existing Facilities

In the Final Draft RFP, the Company specifies that bids already contracted to deliver to IPC as of or after April 1, 2028, are not eligible to bid into the RFP. The Company further clarified in a DR response to NIPPC that if it were to accept bids from resources with existing contracts, it would not provide the incremental capacity the Company is seeking.[40] It also clarified that projects with contracts expiring after 2028 could be eligible to provide incremental capacity in a later year and could be considered to meet future needs, such as through future RFPs.[41]

Stakeholder feedback

In its comments, NIPPC states it believes the RFP should provide more clarity and opportunity for existing resources to bid.[42] NIPPC outlines two reasons why it believes facilities currently contracted with IPC should be allowed to bid into this RFP:

1. Existing wind and solar facilities, including PURPA facilities, that have PPAs may be expiring within the next several years after the RFP's target date of April 1, 2028.
2. Existing facilities could repower with modern equipment that could increase output and add incremental capacity.

Specifically, NIPPC recommended that the RFP allow bidders with existing facilities selling to IPC to bid a replacement power sale term which would terminate or alter the terms of its existing Power Purchase Agreements (PPA). NIPPC notes there is precedent for allowing bids from existing facilities that provide incremental capacity.[43] In UM 2166, the Commission directed PGE to accept bids from repowered existing facilities.[44]

In its comments, NIPPC further explains that recent changes to Idaho's PURPA regulations may lead to Qualifying Facilities (QFs) having an interest in participating in the RFP process instead of the PURPA process.[45] Specifically, NIPPC notes that the Idaho Commission has established a two-year cap for QFs over 100 kW.[46] These facilities may be interested in bidding into the RFP process as a way to secure longer-term PPAs.

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[40] IPC Response to NIPPC DR No. 1.
[41] *Id*.
[42] NIPPC Comments on Draft RFP, June 3, 2024, p. 16.
[43] *Id*. pp. 16 – 19.
[44] Docket No. UM 2166, Order No. 21-320, October 6, 2021, p. 1.
[45] NIPPC Comments on Draft RFP, June 3, 2024, pp. 17 – 18.
[46] See Idaho Public Utility Commission. Case No. IPC-E-20-02, Order No. 34794, pp. 13 – 14, October 2, 2020.

Staff analysis
Staff understands IPC's desire for facilities that will provide incremental capacity. Staff also believes the Commission's order from UM 2166 is clear and applicable in this instance.[47] Allowing existing facilities, including those that would repower, to bid into the RFP will allow for a full consideration of projects and benefit customers. Further, Idaho's PURPA rules may make the RFP process appealing for QFs located in IPC's service territory. Staff finds it appropriate for these facilities to have the opportunity to bid into the RFP.

Specifically, Staff recommends a condition of approval that allows existing facilities with contracts with Idaho Power that are expected to expire and release capacity within the timeframes for COD specified in this RFP be allowed to bid into the RFP process with the capacity provided at the conclusion of the existing contract. For example, a QF contracted with IPC through 2029 should have the opportunity to bid into the RFP the capacity of that facility starting after the conclusion of their current contract.

Because Idaho Power's 2023 IRP did not assume wind QF renewals in its IRP modeling, Staff understands that the capacity need reflected in the RFP already reflects the capacity decrease of these projects having left IPCs system. As such, the capacity of RFP bids from any of these facilities would reflect incremental capacity to meet the Company's needs. Further, these facilities may choose to repower and add increased capacity.

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.

Form Contracts
Staff notes that it views form contracts as a starting point for negotiations between a bidder and the utility and often leaves specific provisions up to negotiation. However, as noted in UM 2274, bidders may view a utility's proposed form contracts as representative of the terms the utility would like priced into the bid.[48] Thus, Staff has an interest in ensuring form contracts are reflective of market expectations to avoid inflated bid prices.

Stakeholder feedback
In its comments, NIPPC proposed several changes to IPC's form contracts. The Company stated in its Reply Comments that many of these proposed changes are not appropriately debated at this point in the process and are better suited for contract negotiations.

[47] Docket No. UM 2166, Order No. 21-320, October 6, 2021, p. 1.
[48] Docket No. 2274, Order No. 24-011, January 12, 2024, pp. 2 – 4.

Staff analysis
To ensure the form contracts are reflective of market conditions and best practices, Staff worked with the IE to evaluate NIPPC's recommended changes to the form contracts. Staff provides this analysis below along with recommended conditions of approval where appropriate.

Staff emphasizes that terms presented in form contracts are ultimately negotiated between the bidder and the Company following selection to the FSL and the analysis presented below does not indicate a preference for certain terms or limit the Company's ability to negotiate terms it believes are in ratepayers' best interests.

COD Flexibility
NIPPC recommended the Company revise the form contracts to provide greater flexibility for a bidder to achieve the specified Commercial Operation for PPAs and BSAs, suggesting a 180-day window instead of the proposed 90-day window.

Per the IE's analysis, while on the low end of what is commonly seen in the market, the 90-day COD window is a reasonable starting point for a negotiation given IPC's resource and capacity needs. Staff does not believe a change to this aspect of the form contracts is necessary.

Pre-COD Damages Payment
NIPPC recommended IPC limit the damages owed by the Seller for termination prior to the COD to the amount of the Project Development Security. It notes under the current form contract for PPAs and BSAs, the Seller must pay the Project Development Security plus Delay Damages owed.

Staff agrees with NIPPC's analysis. However, based on how the form contract is written, Staff believes there is adequate opportunity for negotiation on this issue and thus does not recommend changes to this component of the form contracts. Both the Project Development Security and the Delay Damages-amount per MWh are best negotiated between the bidder and the Company.

PPA Output Guarantee
Staff and the IE agree with NIPPC that monthly output guarantees are unusual in the industry. Annual guarantees are generally advantageous, particularly for new projects as they allow a project to correct operations in the short term to meet the annual guarantee.

Staff does not believe monthly output guarantees are appropriate and is concerned that structuring the form contracts based off monthly guarantees could cause bidders to inflate prices to account for potential failures to meet these guarantees. While monthly guarantees were included in the 2026 AS RFP, Staff believes it would be beneficial to change this in the form contract for the 2028 AS RFP. Staff proposes the Company adjust the form contract to use yearly output guarantees.

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

PPA Deficit Damages
NIPPC recommends PPA's Deficit Damages for each MW placed in service less than Expected Nameplate Capacity be reduced from $150,000/MW to $100,000/MW.

Based on analysis of the IE, Staff believes the deficit damages included in the form contracts are an appropriate starting point for negotiations and does not believe an adjustment to the form contracts is necessary. Further, this amount matches what was approved in the 2026 AS RFP.[49]

Future environmental attributes
NIPPC recommended the PPA/Battery Storage Agreement form contracts be revised to ensure the seller is not "responsible for the open-ended and uncapped costs to register and supply future environmental attributes that do not exist today."[50]

Based on analysis of the IE, Staff believes this language is typical in the market and the way the contract is written provides sufficient opportunity for bidders to negotiate on this topic.

Technical specifications
Key Capture Energy submitted comments primarily focused on many of the technical specifications for battery energy storage system (BESS) projects outlined in Exhibit G of the Final Draft RFP.[51]

Staff Analysis
Staff appreciates Key Capture Energy submitting this information. Staff understands that bidders may provide exceptions to the technical specifications in their bid submissions. These exceptions are not cause for bid elimination and bidders will have the opportunity to negotiate these specifications with the Company. Further, it is within the IE's scope to monitor technical specifications during bid evaluation and contract negotiation and evaluate any price increases that occur due to exceptions provided by bidders. Staff will work with the IE and the Company to ensure this is evaluated as appropriate.

[49] Docket No. UM 2255, Idaho Power's Final Draft 2026 All-Source Request for Proposals (RFP), p. 4, February 22, 2023.
[50] NIPPC Comments on Draft RFP, June 3, 2024, p. 24.
[51] Docket No. UM 2317, Key Capture Energy's Comments, June 17, 2024.

Conclusion

Staff's analysis shows that the Final Draft RFP will result in a fair and competitive bidding process. Idaho Power's Final Draft 2028 All-Source Request for Proposals and its associated SMM should be approved for issuance, subject to the conditions recommended by Staff. Below is a list of Staff's recommendations:

SMM Conditions

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.

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.

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

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.

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.

RFP Conditions

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.

RFP Condition No. 2: IPC reflect in LTSA 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.

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.

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

PROPOSED COMMISSION MOTION:

Approve Idaho Power's Scoring and Modeling Methodology, subject to the SMM Conditions recommended by Staff.

Approve Idaho Power's Final Draft of the 2028 All-Source RFP, subject to the conditions outlined in this memo.

UM 2317

Attachment A – Staff and IE Recommendations from Opening Comments.

Number	Staff Recommendations	Status	Staff comment
Staff - 1	Company responds to the IE recommendations in its Reply Comments.	See second section of this table.	N/A
Staff - 2	In Reply Comments, the Company should propose and reflect on changes in the initial screening that will allow projects with CODs beyond 2028 to remain eligible.	Addressed through Final Draft RFP, Exhibit R.	Further discussion in Section: 2029 and Later COD and Interconnection Requirement of this report.
Staff - 3	In its Reply Comments, Idaho Power should clarify the guidelines it provides bidders for development schedules. If IPC does not have such guidelines, Staff suggests development schedules include the following details: o Development timeline. o Dates of major milestones. o Description of project risks, including discussion of their influence on the project's critical path and mitigation strategies.	Addressed in Final Draft RFP.	N/A
Staff - 4	In its Reply Comments, Idaho Power should clearly state the changes made to the assumptions in the price model, allowing stakeholders to provide feedback on these changes, ensuring they are consistent with industry best practices and reflective of the best available information.	Addressed in IPC Reply Comments.	N/A
Staff - 5	In Reply Comments, the Company should explain how it will evaluate economical bids with CODs beyond 2028.	Addressed through Final Draft RFP, Exhibit R.	Further discussion in Section - 2029 and Later COD and Interconnection Requirement of this report.

Number	Staff Recommendations	Status	Staff comment
Staff - 6	The 2028 RFP should specify the resource volume it plans to fill with the 2028 COD bids. Any changes to this volume that occur during the RFP process should be published to both this docket and to bidders, along with supporting rationale.	Addressed in IPC Reply Comments and in SMM Condition 1 of this Staff Report.	Staff proposes a condition based on this recommendation in this Staff Report.
Staff - 7	In Reply Comments, Staff would like IPC to propose a strategy for reflecting the risk of community opposition to renewable energy siting in its analysis of a project's ability to attain necessary permits.	Addressed in Final Draft RFP.	Idaho Power added an additional scoring metric under the permitting criteria that addresses this concern.
Staff - 8	In Reply Comments, the Company should clarify the variables subject to stochastic analysis as well as the assumptions used in this analysis.	Addressed in IPC Reply Comments.	N/A
Staff - 9	In Reply Comments, IPC should explain how it believes the current B2H delay, and possible further delays past 2028, could impact the selection of projects or ultimate performance of the FSL, including an explanation of any contingency plans.	Addressed in IPC Reply Comments.	IPC continues to assert that the delay in B2H is not relevant for bids with 2028 or later CODs given the expected in-service date for B2H is in 2027.
Staff - 10	In Reply Comments, IPC should provide a brief explanation of Present Value Revenue Requirement (PVRR) calculations.	Addressed in the Final Draft RFP.	IPC added a brief explanation for bidders in the document.
Number	**IE Recommendations**	**Status**	**Staff Comment**
IE - 1	State clearly in the RFP how IPC would reflect its "preference" in the processing of projects coming online in 2028 vs. projects with in-service dates beyond 2028.	Addressed through Final Draft RFP, Exhibit R.	N/A
IE - 2	Create separate questions under the permitting process to better assess the level of controversy.	Addressed in Final Draft RFP.	Same as Staff – 7.

Number	Staff Recommendations	Status	Staff comment
IE - 3	Provide a few clarifying sentences on the utilization of Exhibit O in contract normalization.	Addressed in Final Draft RFP.	Same as Staff – 10.
IE - 4	Eliminate the requirement for proof of GIA or GIA application for projects with in-service dates beyond 2028 and modify forms accordingly.	Addressed in Final Draft RFP, Exhibit R.	N/A
IE - 5	Include sensitivity analysis around the commercialization timing of the Gateway West transmission project.	Addressed in Reply Comments.	IPC notes this will not impact bids in 2028, but it will include a sensitivity for bids with 2029 or later CODs.

Attachment B – Staff's Proposed Draft RFP Schedule

Legend

Both bid pools
Group 1 bids (IX requirement)
Group 2 bids (later CODs, no IX requirement)

Milestone	**Staff Proposed Draft Schedule**
Staff Report on Scoring and Modeling Methodology & Draft Final RFP filed	7/29/2024
Final IE Report due on draft AS RFP	8/2/2024
All Party Comments on Staff report due	8/9/2024
Commission **special** public meeting (SMM and RFP discussion and approval)	8/15/2024
Bidders Notified of Final RFP	8/16/2024
Last Day for RFP Questions	8/21/2024
Benchmark bids due (2028 and 2029 Benchmark bids)	8/23/2024
IPC Submit Benchmark Bids Scores to IE (2028 and 2029 Benchmark bids)	8/28/2024
IE submit Benchmark bids report (2028 and 2029 Benchmark bids)	9/16/2024
RFP Bids Due	9/16/2024
Open RFP Bids	9/17/2024
Bid Eligibility Screening complete and scores to IE	9/20/2024
IE Files Report on Bid Eligibility	9/30/2024
IPC shares Initial shortlist with Staff and IE without sensitivity analysis	10/11/2024
2029 Benchmark bids price update deadline	10/15/2024
2029 Bids Bid Definition Forms Due	10/15/2024
2029 Bids Bid Entry Forms Distributed to Bidders	11/1/2024
IE completes review and files report of Initial shortlist	11/1/2024
Bidders Notified of Initial Shortlist	11/4/2024
Bidders provide updates to bid if applicable	11/11/2024
2029 Bids Last Day for RFP Questions	11/15/2024
Final short list - IPC shares sensitivities and workpapers supporting FSL with IE and staff	12/10/2024

IE closing report on RFP to IPC and staff	1/10/2025
IPC may file request for acknowledgement of final shortlist with IE closing report	1/10/2025
Begin 10 Day Response Time for Information Requests	1/10/2025
IPC Begins preliminary contract negotiations	1/13/2025
Staff and party comments on final shortlist	1/24/2025
IE submit 2029 Bids Benchmark Bids Update Report	1/27/2025
2029 Bids RFP Bids Due	1/27/2025
2029 Bids Open RFP Bids	1/28/2025
IPC Reply Comments	2/4/2025
2029 Bids Bid Eligibility Screening complete and scores to IE	2/17/2025
Staff report on final shortlist	2/21/2025
IPC and interested party comments on Staff report	2/28/2025
IE files 2029 Bids report on Bid Eligibility	3/4/2025
Public Meeting for Final shortlist acknowledgement decision	3/4/2025
2029 Bids IPC completes Non-Price & Price Scoring and prepares Initial Shortlist and submits to IE (without sensitivities)	3/22/2025
IE files 2029 Bids report on Initial Shortlist	4/14/2025
2029 Bids Bidders Notified of Initial Shortlist	4/15/2025
2029 Bids Bidders provide updates to bid if applicable	4/29/2025
Idaho Power provides 2029 Bids Final Shortlist and supporting workpapers to IE and Staff (with sensitivities)	6/13/2025