



e-FILING REPORT COVER SHEET

COMPANY NAME: Idaho Power Company

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? No Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)
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Report is required by: OAR 860-089-0100
 Statute
 Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other
(For example, federal regulations, or requested by Staff)

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List Key Words for this report. We use these to improve search results.

Notice of Exception to Competitive Bidding Requirements

Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@puc.oregon.gov

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.



ADAM LOWNEY
Direct (503) 595-3926
adam@mrg-law.com

January 22, 2025

VIA E-MAIL TO

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

Re: Idaho Power Company's Notice of Exception under OAR 860-089-0100.

Attention Filing Center:

In accordance with OAR 860-089-0100(3) and (4), Idaho Power Company ("Idaho Power") provides the enclosed report detailing the circumstances related to a time-limited opportunity to acquire a resource of unique value to Idaho Power's customers. This report is being served on all parties to Idaho Power's last general rate case, docket UE 426, Idaho Power's last Integrated Resource Plan case, docket LC 84, and current request for proposal case, docket UM 2317.

The enclosed report contains commercially sensitive information that is provided as confidential under OAR 860-001-0070. Confidential information will be provided upon request to those that execute a non-disclosure agreement; please contact Idaho Power's legal counsel listed below for additional information.

Idaho Power respectfully requests that all communications related to this filing be addressed to:

Donovan E. Walker
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
dwalker@idahopower.com

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

January 22, 2025

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Regulatory Dockets
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
dockets@idahopower.com

Please direct inquiries regarding this filing to Donovan E. Walker at (208) 388-5317.

Sincerely,



Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th, Ave., Suite 400
Portland, OR 97205
Direct: (503) 595-3926
Email: adam@mrq-law.com

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on the parties to Dockets UE 426, LC 84, and UM 2317, Idaho Power's previous rate case, IRP and RFP, on the date indicated by email addressed to said person(s) at his or her last-known address(es) indicated below.

UE 426 Service List

Staff	
Stephanie S. Andrus Oregon Department of Justice Business Activities Section 1162 Court St. NE Salem, OR 97301-4096 stephanie.andrus@doj.oregon.gov	Matthew Muldoon Public Utility Commission of Oregon P.O. Box 1088 Salem, OR 97308-1088 matt.muldoon@puc.oregon.gov
Simplot	
Dru Nakaya Simplot 1099 Front St. Boise, ID 83702 dru.nakaya@simplot.com	Peter J. Richardson Richardson Adams PLLC 515 N 27 th St. Boise, ID 83702 peter@richardsonadams.com
Oregon Irrigation Pumpers Association, LLC	
Lance Kaufman 2623 NW Bluebell Place Corvallis, OR 97330 lance@aeqisinsight.com	Eric Olsen 505 Pershing Ave., Ste. 100 Pocatello, ID 83201 elo@echohawk.com

<p>Brent Stanger Oregon Irrigation Pumpers Association P.O. Box 667 Ontario, OR 97914 brents@grant4dfarms.com</p>	
<p>CUB</p>	
<p>Ryan Tran Oregon Citizens' Utility Board 610 SW Broadway, Ste. 400 Portland, OR 97205 ryan@oregoncub.org</p>	<p>Claire Valentine-Fossum Oregon Citizens' Utility Board 610 SW Broadway, Ste. 400 Portland, OR 97205 claire@oregoncub.org dockets@oregoncub.org</p>
<p>Idaho Power Company</p>	
<p>Adam Lowney Jocelyn Pease McDowell Rackner Gibson PC 419 SW 11th Ave. Ste. 400 Portland, OR 97205 adam@mrg-law.com jocelyn@mrg-law.com dockets@mrg-law.com</p>	<p>Lisa Nordstrom Idaho Power Company P.O. Box 70 Boise, ID 83707-0070 lnordstrom@idahopower.com dockets@idahopower.com</p>
<p>CEP</p>	
<p>Tonia L. Moro Attorney at Law PC 106 Talent Ave., Ste. 6 Talent, OR 97540 tonia@toniamoro.com</p>	<p>Siraat Younas Community Energy Project 2705 E Burnside, Ste. 112 Portland, OR 97214 siraat@communityenergyproject.org</p>

LC 84 Service List

Stop B2H	
Jim Kreider 60366 Marvin Rd. La Grande, OR 97850 jkreider@campblackdog.org	
Staff	
Aboubakr Abdallah Public Utility Commission of Oregon P.O. Box 1088 Salem, OR 97308-1088 aboubakr.abdallah@puc.oregon.gov	Marli Klass Oregon Department of Justice 1162 Court St. NE Salem, OR 97301-4096 marli.klass@doj.oregon.gov
Renewable NW	
Diane Brandt Katie Chamberlain Renewable Northwest 421 SW 6 th Ave., Ste. 1400 Portland, OR 97204 diane@renewablenw.org katherine@renewablenw.org	Max Greene Sanger Law PC 4031 SE Hawthorne Blvd. Portland, OR 97214 max@sanger-law.com
Renewable Energy Coalition	
Irion A. Sanger Ellie Hardwick Sanger Law PC 4031 SE Hawthorne Blvd. Portland, OR 97214 irion@sanger-law.com ellie@sanger-law.com	John Lowe Renewable Energy Coalition P.O. Box 25576 Portland, OR 97298 johnl@recoalition.com

CUB	
John Garrett Claire Valentine-Fossum Oregon Citizens' Utility Board 610 SW Broadway, Ste. 400 Portland, OR 97205 john@oregoncub.org claire@oregoncub.org dockets@oregoncub.org	
Idaho Power Company	
Lisa D. Nordstrom Idaho Power Company P.O. Box 70 Boise, ID 83707-0070 lnordstrom@idahopower.com dockets@idahopower.com	Lisa F. Rackner McDowell Rackner Gibson PC 419 SW 11 th Ave, Ste. 400 Portland, OR 97205 dockets@mrg-law.com

UM 2317 Service List

Staff	
Natascha Smith Oregon Department of Justice Business Activities Section 1162 Court St. NE Salem, OR 97301 Natascha.b.smith@doj.oregon.gov	
Pivotgen	
Rob Curulla Pivotgen 500 W Madison St., Ste. 1000 Chicago, IL 60661 rob.curulla@pivotgen.com	

CUB	
<p>Claire Valentine-Fossum Oregon Citizens' Utility Board 610 SW Broadway Ste. 400 Portland, OR 97205 claire@oregoncub.org dockets@oregoncub.org</p>	
NIPPC	
<p>Gregory M. Adams Richardson Adams PLLC 515 N 27th St. Boise, ID 83702 greg@richardsonadams.com</p>	<p>Spencer Gray NIPPC sgray@nippc.org</p>
<p>Irion A. Sanger Ellie Hardwick Sanger Law PC 4031 SE Hawthorne Blvd. Portland, OR 97214 irion@sanger-law.com ellie@sanger-law.com</p>	
Key Capture Energy	
<p>Kai Lin Yi Zhang Quinn Beckham Bruna Da Silva Danny Musher Heather Wong Peter Zullo kai.lin@keycaptureenergy.com yi.zhang@keycaptureenergy.com quinn.beckham@keycaptureenergy.com bruna.dasilva@keycaptureenergy.com danny.musher@keycaptureenergy.com heather.wong@keycaptureenergy.com peter.zullo@keycaptureenergy.com</p>	

Idaho Power Company	
Adam Lowney McDowell Rackner Gibson PC 419 SW 11 th Ave, Ste. 400 Portland, OR 97205 adam@mrg-law.com dockets@mrg-law.com	Donovan E. Walker Megan Goicoechea-Allen Idaho Power Company P.O. Box 70 Boise, ID 83707-0070 dwalker@idahopower.com mgoicoecheaallen@idahopower.com dockets@idahopower.com
Step toe & Johnson LLP	
Thomas V. Donadio Step toe & Johnson LLP 227 W. Monroe St. Chicago, IL 60606 tdonadio@step toe.com	
Nova Gen Consulting LLC	
Dina Dubson Kelley Nova Gen Consulting LLC dina@novagen.us	

DATED: January 22, 2025.

Cole Albee
Paralegal
McDowell Rackner Gibson PC



RESOURCE PROCUREMENT FOR ELECTRIC COMPANIES

**REPORT TO THE
PUBLIC UTILITY COMMISSION OF OREGON
PURSUANT TO OAR 860-089-0100
(REDACTED)**

IDAHO POWER COMPANY
ACQUISITION OF RESOURCES FOR 2026

January 22, 2025

I. INTRODUCTION

Idaho Power Company (“Idaho Power” or “Company”), in accordance with OAR 860-089-0100(3) and (4), hereby respectfully submits this report explaining the circumstances related to a time-limited opportunity to acquire a resource of unique value to Idaho Power customers. Under the Public Utility Commission of Oregon’s (“Commission”) Competitive Bidding Rules (“CBRs”),¹ an electric utility such as Idaho Power must issue a request for proposal (“RFP”) that complies with the CBRs for the acquisition of a generation resource or contract 80 megawatts (“MW”) and larger and five years or longer in length, subject to certain exceptions.² An exception to this requirement is where “[t]here is a time-limited opportunity to acquire a resource of unique value to the electric company’s customers.”³ When this exception to the CBRs applies, the electric company must file a report with the Commission explaining the relevant circumstances of the acquisition.⁴

In this filing, Idaho Power provides notice that it has acquired a resource subject to the exception for a time-limited opportunity to acquire a resource of unique value to the electric company’s customers—a 50 MW dispatchable battery energy storage system (“BESS”) that will be installed at the Hemingway substation (“Hemingway Incremental 50 MW”). This resource was selected as a replacement resource for shortlisted projects in the 2026 All Source Request for Proposal (“2026 RFP”) that will not be capable of achieving commercial operation in 2026.

¹ OAR Chapter 860, Division 089.

² OAR 860-089-0100(1).

³ OAR 860-089-0100(3)(b).

⁴ OAR 860-089-0100(4).

II. BACKGROUND

A. Resource Need

During preparation of the 2021 Integrated Resource Plan (“IRP”), the Company first identified a capacity deficit beginning in 2023. The annual capacity positions identified in the 2021 IRP were deficits of approximately 101 MW in 2023, 186 MW in 2024, 311 MW in 2025, 560 MW in 2026 and 665 MW in 2027. As a result, in order to meet its obligation to reliably serve customer load in a least-cost, least-risk manner, Idaho Power began the competitive solicitation for the acquisition of resources, conducted through the issuance of multiple RFPs—the 2021 All Source Request for Proposals for Peak Capacity and Energy Resources issued on June 30, 2021 (“2021 RFP”), the 2022 All Source Request for Proposals for Peak Capacity and Energy Resources issued on December 30, 2021 (“2022 RFP”), and the 2026 RFP. The competitive RFP process allowed the Company to access the broader peak capacity and energy market to obtain the best resources for Idaho Power’s customers, allowing for access to a spectrum of potential resources and developers. Use of a formal RFP process provides customers with the assurance that the resource selection process was competitive, all potential developers had an equal opportunity to participate, and that the best resource alternative was selected.

B. 2026 RFP

Following approval by the Commission, the 2026 RFP was issued on June 8, 2023, and targeted resource procurement consistent with the capacity deficiencies identified in the 2021 IRP. Accordingly, the 2026 RFP sought proposals for a combination of energy and capacity resources with as much as 1,100 MW of variable energy resources and a minimum of 350 MW of peak capacity. Idaho Power accepted bids for energy or capacity

incremental to its system in the 2026 timeframe from market energy purchases or new or existing resources.

Through the 2026 RFP, the Company’s intent was to solicit bids for (1) energy market purchases and (2) new or existing resources. Energy market bids were required to begin delivery across Idaho Power-controlled transmission on or before June 2026. The eligible products included asset purchases, power purchase agreements (“PPAs”), and battery service agreements (“BSAs”) with exclusive ownership by the Company of any and all environmental attributes associated with the energy generated. New resource bids were required to have a target commercial operation date on or before June 2026.

C. Final Shortlist

On December 8, 2023, in accordance with OAR 860-089-0500, Idaho Power filed a request for acknowledgment of the final shortlist resulting from the 2026 RFP. The final shortlist included the following projects:

Table 1. Final Shortlist – 2026 Projects.

Rank	Resource
1	Market Contract: 5 Years
2	200 MW Solar + 100 MW BESS
3	200 MW Solar
4	150 MW BESS
5	100 MW Solar + 100 MW BESS
6	200 MW Solar + 50 MW BESS

On February 22, 2024, the Commission issued Order No. 24-055⁵ approving the Company’s final shortlist with two conditions: (1) the Commission acknowledged the final shortlist volume up to 1,100 MW of variable energy resources and 350 MW of peak

⁵ *In re Idaho Power Company, Application for Approval of 2026 All-Source Request for Proposals to Meet 2026 Capacity Resource Need*, Docket No. UM 2255, Order No. 24-055 (Feb. 22, 2024).

capacity to meet the 2026 and 2027 capacity needs as identified in the 2021 IRP, but ordered Idaho Power to file a report with an explanation and justification for any procurement volume in excess of those amounts, and (2) the Company must retain the Independent Evaluator (“IE”) to monitor and report on all contract negotiations, with the IE reporting to Staff at least monthly on contract negotiations and any impacts to pricing or bid withdrawals.

D. Negotiations

Once the most cost-effective 2026 projects were identified, the Company began negotiations with developers for procurement of the resources necessary to meet Idaho Power’s updated 2026 capacity deficit of 236 MW: (1) the 200 MW market purchase product, (2) the Savion, LLC (“Savion”) 200 MW solar photovoltaic (“PV”) plus 100 MW BESS project (the Powers Butte Energy Center), and (3) a benchmark resource, the Idaho Power-owned battery storage facility providing up to 150 MW of operating capacity (the Boise Bench project).⁶

Since identification of the final shortlist, the Company worked diligently with Savion on both the PPA associated with the 200 MW solar PV facility as well as the battery supply agreement associated with the 100 MW battery storage facility. But execution of the agreements stalled when, on July 30, 2024, Savion was denied a Conditional Use Permit by Ada County, Idaho, for their Powers Butte Energy Center. While Savion intends to

⁶ Two of Savion’s projects made the final shortlist, the 200 MW solar PV plus 100 MW BESS project as well as a 200 MW solar PV project (projects two and three in Table 1). However, Savion indicated that, while multiple variations of its 2026 Powers Butte Energy Center project were submitted, only one alternative was available for procurement. That is, the third ranked 200 MW solar facility is the same solar facility reflected in the second ranked Savion project, not a separate, additional 200 MW solar facility.

continue siting efforts, Savion indicated the June 1, 2026, commercial operation date is no longer feasible.

During negotiations with Savion, the Company was also working with the developer of the next most cost-effective project on the final shortlist for the procurement of additional resources to ensure continued reliable electric service in 2026. Because [REDACTED] 200 MW solar PV plus 50 MW BESS would not be large enough to fill the remaining 2026 capacity deficiency, only one potential final shortlist project remained, [REDACTED] 100 MW solar PV plus 100 MW BESS. Unfortunately, when it became evident the Power Butte Energy Center project was likely delayed, [REDACTED] notified Idaho Power that they too would not be able to meet a June 1, 2026, commercial operation date. While the Company continues negotiations with Savion and [REDACTED] as potential cost-effective resource additions for 2027, the inability to contract 2026 resources required Idaho Power to seek alternative resources.

E. Hemingway Incremental 50 MW

To meet the remaining 2026 capacity deficiency created by the delay of the Savion and [REDACTED] projects, that Company was able to cost-effectively expand the least-cost, least-risk 150 MW Boise Bench project to provide an additional 50 MW of operating capacity. The expansion of the Boise Bench project was the subject of an exception filing made on August 30, 2024.⁷ In addition, the Company procured a separate battery storage facility that will provide an additional 50 MW of operating capacity at the

⁷ The filing is available here: <https://edocs.puc.state.or.us/efdocs/HNA/um2317hna331120055.pdf>. In the August 30, 2024, report, the Company noted that it was pursuing the addition 50 MW of BESS that is the subject of this report but that it had not yet finalized the acquisition of the resource.

Hemingway substation, which is the subject of this filing.⁸ Confidential Attachment 1 is a copy of the Hemingway Incremental 50 MW BESS Agreement. In total, the two battery storage facilities will provide the 100 MW of operating capacity necessary to meet the remaining deficit to ensure Idaho Power is able to continue to provide safe, reliable electric service in 2026.

III. DISCUSSION

The Hemingway Incremental 50 MW battery storage represents a time-limited opportunity to acquire a resource of unique value to customers. The BESS is a least-cost, least-risk resource necessary to meet the 2026 capacity deficiency.

To determine the reasonableness of the Hemingway Incremental 50 MW battery storage, Idaho Power compared the levelized cost of the BESS to the levelized cost of the final shortlist project in the equivalent technology group. This comparison was possible because the 2026 RFP bids were ranked within their respective technology group based on their pricing and non-pricing scores. The Company was able to procure the Hemingway Incremental 50 MW battery storage at a levelized cost *less than* the levelized cost of the initial Boise Bench battery storage facility bid.

In addition, after requesting bids from several entities for the Hemingway Incremental 50 MW battery storage, the Company was able to obtain competitive pricing from a domestic supplier for whom import tariff rates do not apply, reducing the risk associated with increased import tariff rates. To further safeguard against any potential tariff risks, the Hemingway Incremental 50 MW battery storage system will be delivered in 2025. Finally, it is worth noting that one of the projects bid into the 2026 RFP was a

⁸ Because the procurement of the second 50 MW BESS is not completed yet, the Company will submit a second exception filing for that resource.

battery storage facility providing 100 MW of operating capacity at Hemingway. Although the project ranked as one of the top 10 most cost-effective resources for 2026, it was not moved forward to the final shortlist because the project's existing Generator Interconnection Agreement ("GIA") only had approximately 50 MW of available capacity, not the 100 MW of capacity bid into the RFP. With an operating capacity of 50 MW, the Hemingway Incremental 50 MW battery storage facility is, essentially, the same project bid into the RFP and identified as a cost-effective resource.

The procurement of the Hemingway Incremental 50 MW battery storage is also time sensitive because there is insufficient time to conduct another RFP before the 2026 resource need. The 2026 RFP spanned nearly 15 months, which did not include contract negotiation, contract execution, material procurement, and construction, which can take another two to four years, depending on the resource. When it became apparent that projects from the 2026 RFP final shortlist were unable to achieve commercial operation by 2026, the Company was required to act quickly to find timely alternatives.

While the Hemingway Incremental 50 MW battery storage was not procured through an RFP, its procurement was informed by the results of the 2026 RFP, which began with the engagement of an IE, included participation from Staff and stakeholders throughout, and involved a comprehensive eligibility screening process, the meticulous assessment and scoring of the resource bids, including benchmark resources, and a rigorous scenario analysis followed by a portfolio sensitivity analysis of the final shortlist. At the end of the process, the Company's IE attested to the reasonableness of Idaho Power's approach in identifying bids for the final shortlist and stated the process was

conducted with the utmost fairness and impartiality, upholding the integrity of the selection process.

To meet the 2026 capacity deficiency, the Company used the results from the final shortlist, selecting two of the most cost-effective projects identified through the extensive competitive bidding process but was unable to contract from the final shortlist additional resources necessary to meet the remaining 2026 capacity deficiency. The procurement of the alternative discussed here, together with the resource subject to the Company's August 30, 2024, exception filing, will provide for the least-cost and least-risk resources necessary and required to timely meet the Company's resource needs and continue to provide reliable and adequate service to Idaho Power's customers starting in the summer of 2026 and into the future.

IV. CONCLUSION

To meet Idaho Power's 2026 capacity deficit, the Company acquired a replacement resource to fulfill the need created by delays in final shortlist projects from the 2026 RFP. This resource is least-cost, least-risk and present a time limited opportunity and provide value to customers because it can achieve commercial operation by summer 2026.

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY'S NOTICE OF EXCEPTION
UNDER OAR 860-089-0100

Attachment 1

Hemingway Incremental 50 MW BESS Agreement

REDACTED

January 22, 2025

IDAHO POWER COMPANY'S NOTICE
OF EXCEPTION UNDER
OAR 860-089-0100

ATTACHMENT 1 IS CONFIDENTIAL IN
ITS ENTIRETY SUBJECT TO OAR
860-001-0070 AND IS PROVIDED
SEPARATELY

January 22, 2025