

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1793**

In the Matter of

IDAHO POWER COMPANY,

Application for Approval of Solar Integration  
Charge.

Renewable Northwest’s Response to  
Petition for Clarification

**I. Introduction.**

Renewable Northwest respectfully submits this Response to Idaho Power Company’s (“Idaho Power” or “the Company”) Petition for Clarification (“the Petition”) filed on May 1, 2017, in which the Company requested that the Oregon Public Utility Commission (“Commission) clarify its resolution of three issues addressed in Order 17-075. Renewable Northwest takes no position on Idaho Power’s request that the Commission clarify that Order 17-075 adopted solar integration charges like those used in Idaho. However, Renewable Northwest disagrees with Idaho Power’s proposed clarifications as to when the Company should form a technical review Committee (“TRC”) and whether the Company must conduct new integration cost studies as part of each of its integrated resource planning cycles. Accordingly, Renewable Northwest recommends that the Commission deny Idaho Power’s proposed clarification regarding the timing of the TRC, as well as the Company’s proposed clarification on the need for wind integration studies after 2019.

**II. Request for Waiver of Timeline to Respond to the Petition.**

Renewable Northwest respectfully requests a waiver of the timeline to respond to the Petition. Our understanding is that the Petition is being treated procedurally as an application for reconsideration of an order. OAR 860-001-0720(4) provides that responses to an application for reconsideration of an order should be filed within 15 days from filing of the application. Renewable Northwest submits this Response outside of that 15-day period. In accordance with OAR 860-001-0000, Renewable Northwest respectfully requests a waiver of the timeline set forth in OAR 860-001-0720(4) for the

limited purpose of filing this Response to the Petition.

### **III. Idaho Power’s Proposed Clarification on the Timing for Consulting with the Technical Review Committee Is Not Consistent with Order 17-075.**

Idaho Power asks the Commission to clarify that conducting the Wind Integration Study (“WIS”) and the energy Imbalance Market (“EIM”) Report prior to forming a TRC would comply with Order 17-075.<sup>1</sup> The Company proposes that, following completion of the WIS and EIM Report, it would form a TRC to “evaluate the feasibility of estimating the unified costs of integrating wind and solar into its system and evaluate methods for sharing out those estimated costs between wind and solar resources.”<sup>2</sup>

Order 17-075 directs Idaho Power to conduct a WIS in consultation with a TRC. Order 17-075 requires the Company to conduct a new WIS “utilizing the TRC process following the procedural path outlined below.”<sup>3</sup> Order 17-075 also directs Idaho Power to work with the TRC “to thoroughly evaluate whether to conduct a joint wind and solar integration cost study.”<sup>4</sup> Under Idaho Power’s proposed clarification, Commission Staff (“Staff”) and interested persons (including Renewable Northwest) who would participate in both a WIS TRC and a TRC to evaluate whether to conduct a joint integration cost study would not have the benefit of fully understanding the details and assumptions that went into the WIS. Similarly, Idaho Power’s approach would make it difficult for TRC participants to assess the effects of different approaches and assumptions in the WIS on the benefits of doing a joint study. As a result, Renewable Northwest agrees with Staff that establishing the TRC after completion of the WIS would run counter to this set of TRC purposes.<sup>5</sup> Therefore, Idaho Power’s proposed clarification is not consistent with Order 17-075.

Idaho Power’s proposed clarification would represent a step backward from established best practices for conducting integration cost studies for renewable resources. The solar integration study originally at issue in this docket represented an improvement in the Company’s practice in conducting integration cost studies for renewable resources. A key difference between this study and prior renewable integration studies that Idaho Power conducted was that the Company worked with a TRC throughout the process. As noted in Idaho Power’s testimony in this docket, National Renewable Energy Laboratory and the Utility Wind Integration Group outline some of the benefits of using TRCs for

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<sup>1</sup> Idaho Power Company’s Petition for Clarification at 5.

<sup>2</sup> *Id.*

<sup>3</sup> Order 17-075 at 7.

<sup>4</sup> *Id.*

<sup>5</sup> Staff Response to Petition for Clarification at 4.

integration cost studies in their “Principles for Technical Review Committee Involvement in Studies of Wind Integration into Electric Power System.”<sup>6</sup> Those benefits include “assisting the utility in ensuring that the quality of the technical work and the accuracy of the results will be as high as possible,” and enhancing “the credibility and acceptance of the study results throughout the affected stakeholder communities.”<sup>7</sup>

The Company’s proposed clarification would revert back to a study process that does not benefit from a TRC. Renewable Northwest participated in the TRC for the solar integration study originally at issue in this docket and can attest to the impact of the TRC in terms of increasing the credibility and acceptance of the study. Indeed, the early involvement of a TRC can help minimize the list of open issues that come before the Commission for review, thereby making the formal deliberations less contentious and narrower in scope. However, the Company’s proposed clarification relies on the premise that the Commission intended to dismiss lessons learned from the solar integration study and process at issue in this docket. Under the Company’s proposed clarification, the Commission would have found that Idaho Power’s wind integration cost methodology could be improved,<sup>8</sup> yet would have nonetheless excluded a TRC and its attendant benefits from the WIS process. As a result, we encourage the Commission to reject Idaho Power’s proposed clarification as inconsistent with Order 17-057.

#### **IV. Idaho Power’s Proposed Clarification on the Frequency of Wind Integration Studies Does Not Have a Basis in Order 17-075.**

Idaho Power requests that the Commission clarify that it does not intend to require the Company to perform new integration studies with each integrated resource plan (“IRP”) and IRP update.<sup>9</sup> However, Order 17-075 is silent on the issue of how frequently Idaho Power must conduct wind or solar integration studies. Moreover, as Staff notes, this issue was not addressed in testimony.<sup>10</sup> As a result, Renewable Northwest encourages the Commission to reject Idaho Power’s request for clarification on this issue.

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<sup>6</sup> Idaho Power/101 DeVol/71.

<sup>7</sup> *Id.*

<sup>8</sup> Order 17-075 at 6-7.

<sup>9</sup> Idaho Power Company’s Petition for Clarification at 6.

<sup>10</sup> Staff Response to Petition for Clarification at 4-5.

**V. Conclusion.**

Renewable Northwest recommends that the Commission deny Idaho Power's proposed clarification regarding the timing of the TRC, as well as the Company's proposed clarification on the need for wind integration studies after 2019.

Dated this 24<sup>th</sup> of May of 2017.

Respectfully submitted,

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