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**VIA ELECTRONIC FILING**

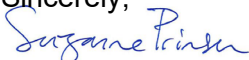
Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

**Re: Docket UM 1730(8) – In the Matter of IDAHO POWER COMPANY, Application to  
Update Schedule 85 Qualifying Facility Information.**

Attention Filing Center:

Attached for filing in the above-captioned docket are Idaho Power Company's Reply Comments.

Please contact this office with any questions.

Sincerely,  


Suzanne Prinsen  
Legal Assistant

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 1730(8)**

In the Matter of  
IDAHO POWER COMPANY  
Application to Update Schedule 85  
Qualifying Facility Information

**IDAHO POWER COMPANY'S  
REPLY COMMENTS**

1 Idaho Power Company (“Idaho Power” or “Company”) respectfully submits the  
2 following comments to the Public Utility Commission of Oregon (“Commission”) in  
3 response to the Public Utility Commission of Oregon Staff’s (“Staff”) February 15, 2023,  
4 Report (“Staff Report”) and the February 17, 2023, comments filed by the Community  
5 Renewable Energy Association (“CREA”) and the Renewable Energy Coalition (“REC”)  
6 (the “QF Parties’ Comments”).

7 On January 5, 2023, Idaho Power filed updated standard avoided cost prices in  
8 accordance with OAR 860-029-0080(3) and OAR 860-0290085(1), which require  
9 utilities to update avoided cost prices within 30 days of acknowledgment of an  
10 Integrated Resource Plan. Staff recommends approving Idaho Power’s avoided cost  
11 update as filed.<sup>1</sup> Idaho Power appreciates Staff’s review of its filing and agrees with  
12 Staff’s recommendation to approve the updated avoided cost prices as filed and without  
13 change.

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<sup>1</sup> Staff Report at 1.

1           In their February 17<sup>th</sup> comments, the QF Parties recommend for the first time in  
2 this case that the Commission approve the filed avoided cost prices but also ask the  
3 Commission to either (1) require Idaho Power to develop a standard solar-plus-storage  
4 rate as part of this post-IRP update; or (2) “provide clear direction that it expects  
5 development of a solar-plus-storage rate in the near term, and approval of Idaho  
6 Power’s avoided cost rates at this time does not prejudice adoption of such a rate  
7 before the next IRP cycle.”<sup>2</sup>

8           Staff preemptively recommended that the Commission reject the QF Parties’  
9 recommendation to develop a solar-plus-storage price here because it is inappropriate  
10 “for the Commission to order a change in the avoided cost methodology in connection  
11 with a post-IRP avoided cost update for one utility.”<sup>3</sup> Staff noted that there is no harm to  
12 potential solar-plus-storage QFs because they can negotiate a non-standard avoided  
13 cost price and that the issue of developing an appropriate solar-plus-storage price  
14 should be addressed in docket UM 2000, where the Commission is investigating  
15 revisions to avoided cost methodologies.<sup>4</sup>

16           The Company agrees with Staff. Developing an entirely new avoided cost price  
17 is far outside the scope of a post-IRP avoided cost price update. Docket UM 2000 is  
18 the appropriate forum for developing new avoided cost methodologies, not a post-IRP  
19 update. This is particularly true here because adopting a standard solar-plus-storage  
20 price is far more complex than simply applying a different capacity contribution to the  
21 existing surrogate avoided resource methodology used to calculate standard prices in

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<sup>2</sup> QF Parties’ Comments at 2.

<sup>3</sup> Staff Report at 4.

<sup>4</sup> Staff Report at 4.

1 Oregon. For example, the standard solar-plus-storage prices adopted in Idaho, and  
2 referred to by the QF Parties, were established using Idaho Power’s Incremental IRP  
3 Methodology. That Incremental IRP Methodology is used for non-standard prices in  
4 Oregon, which, as Staff correctly noted, are available for Oregon solar-plus-storage  
5 QFs.

6 For the foregoing reasons, Idaho Power supports Staff’s recommendation that  
7 the Commission approve the updated avoided cost prices as filed and reject the QF  
8 Parties’ recommendation to develop an entirely new avoided cost pricing methodology  
9 in this case.

Respectfully submitted this 21<sup>st</sup> day of February 2023.

**McDOWELL RACKNER GIBSON PC**



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Adam Lowney

**IDAHO POWER COMPANY**

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