

UM 2210 Workshop Stakeholder Discussion

February 7, 2022



Agenda

Introductions

Overview of Waiver Request & Staff Position

Q & A

Next Steps



Overview of Waiver Request

Waive all CBR

Urgent situation

Proposed process equivalent to CBR

Superiority of Single Process

Akin to ID
CPCN

OR CBR
process takes
too long

OR CBR biased
against utility
ownership;
maybe
necessary

Similar levels
of oversight &
protection

Results in fair
and
transparent
outcomes, but
in less time

Approximates
CBR materials;
Final Report

Contemporane
ous review;
better than
waiting

Avoids
confusion and
delay

95% of
Territory in ID;
prefer an ID
process

Not ratemaking

Overview of Staff's Current Position

Opposed to Waiver

- Cannot support most of IPC's good cause arguments.
- Idaho's alternative process is too far from CBR.

Exception Most Likely Best Pathway

- CBR Compliance can still be achieved through exception.
- Company can share RFP results and any justifications in future GRC filing for potential cost recovery.



Current RFP Waiver “Good Cause” Criteria for Staff

New issue. Developed three evaluative criteria in UM 2176 (dark grey).

Staff’s current observations on merits of Idaho’s RFP waiver request using criteria (light grey).

Minimizes Long-Term Costs & Risks

- Urgency of resource need not clearly established based on lack of IRP review, timing, proposed process

Complements IRP Process

- RFP process largely completed independent of IRP acknowledgement
- Assumes IRP analysis is correct
- RFP will not use IRP model to assess scenarios

Transparent, Understandable, and Fair Given Circumstances

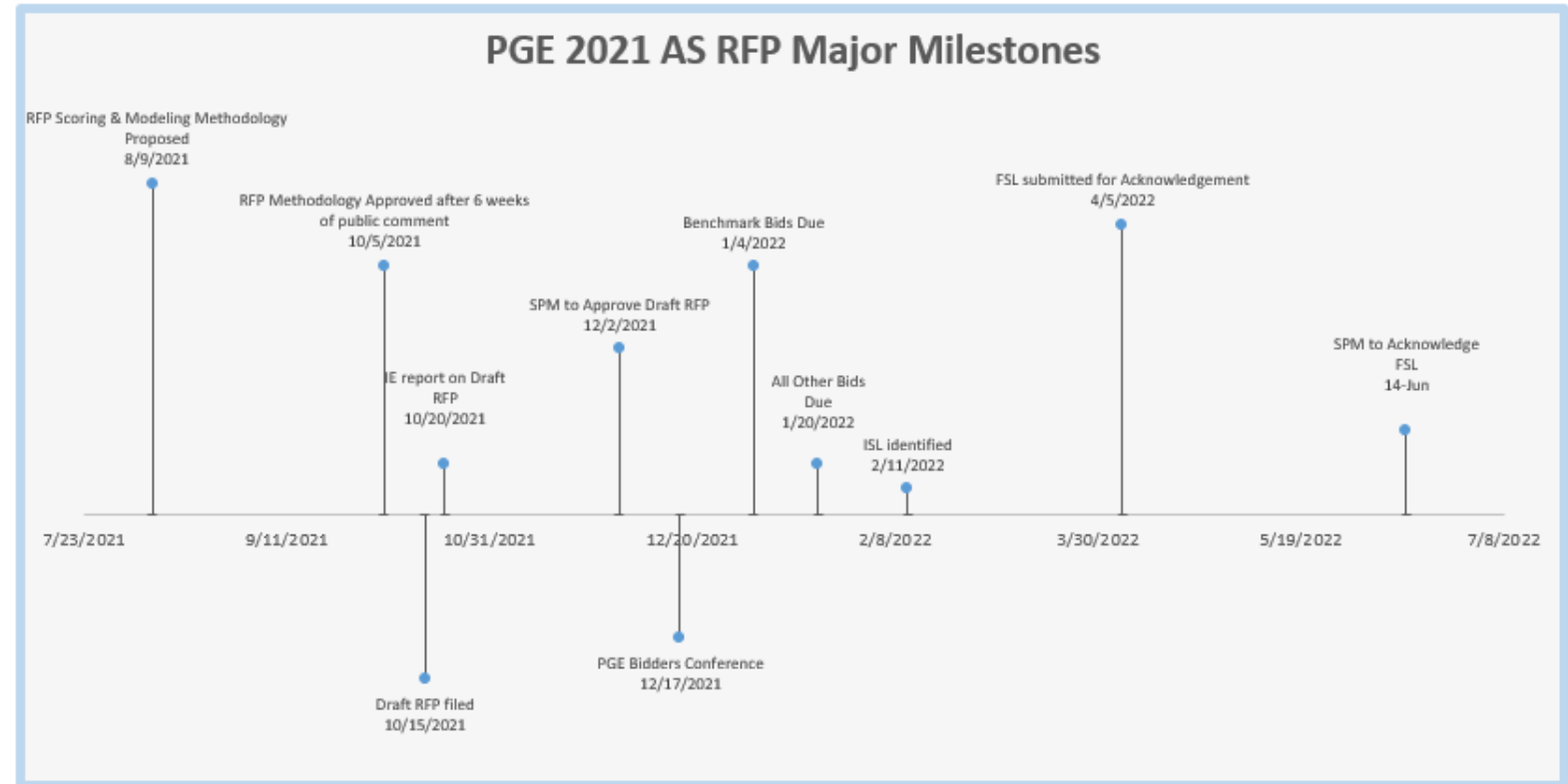
- Proposed CPCN-based process lacks CBR’s transparency and ability to interact at key junctures; complete waiver.
- RFP timeline urgency and 2024 COD raises concerns about fairness



Good Cause: Oregon CBR Lengthy Process

PGE's Process

Approximately ten months to finish, not including IE selection process.



Contrasting Key CBR Elements to Idaho's Process

Key Elements to OR CBR Not Found in Idaho's Proposed Process

Use of an Independent Evaluator at several key junctures in process

Review of Benchmark bids prior to reviewing other bids

Public Input & Commission Approval of Scoring & Modeling Methodology

Public Input & Commission Approval of RFP

Self-Scoring analysis of non-price criteria

Use of IRP model to analyze and test projects and portfolios against sensitivities.

Explanation in RFP Acknowledgement Request of benchmark bid elements made available to all bidders.

Not forcing transfer of ownership (batteries)

Full access by Commission & IE into all models and sensitivity analyses

Exception still an available pathway for CBR Compliance

- Idaho Power could try to make a case for emergency or a time-limited opportunity of unique value when filing the exception.
- Commission has options once exception is filed.
- Full cost recovery still possible in rate case under exception or other process, if the Company can be justify it.

Q & A

- Can submit to staff via email also.



NEXT STEPS

- Staff will publish PM memo early, week of February 21.
- Staff will bring to March 8 PM

Thank you!

