



ALISHA TILL
Direct (503) 290-3628
alisha@mrg-law.com

December 8, 2022

VIA ELECTRONIC FILING

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

Re: UM 2255 - In the Matter of Idaho Power Company, Application for Approval of 2026 All-Source Request for Proposals to Meet 2026 Capacity Resource Need.

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power Company's Request for Commission Approval to Engage an Independent Evaluator.

Please contact this office with any questions.

Sincerely,

Alisha Till
Paralegal

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2255

In the Matter of

IDAHO POWER COMPANY

Application for Approval of 2026 All-Source
Request for Proposals to Meet 2026 Capacity
Resource Need.

**IDAHO POWER COMPANY'S REQUEST
FOR COMMISSION APPROVAL TO
ENGAGE INDEPENDENT EVALUATOR**

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I. INTRODUCTION

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In accordance with the Competitive Bidding Rules adopted by the Public Utility Commission of Oregon (Commission), Idaho Power Company (Idaho Power or Company) is issuing a 2026 All-Source Request for Proposals (RFP), soliciting the acquisition of a combination of energy and capacity resources with as much as 1,100 megawatts (MW) of variable energy resources and a minimum of roughly 800 MW of peak capacity. This solicitation is responsive to the resource needs identified in the Company's 2021 Integrated Resource Plan (IRP) filing, which was acknowledged by the Commission on December 6, 2022,¹ and advances Idaho Power's goals to deliver affordable, reliable, and clean energy to its customers.

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In accordance with OAR 860-089-0200(2), Idaho Power files this request for Commission approval to select and engage an Independent Evaluator (IE) to assist the Company and the Commission through the development and oversight of Idaho Power's 2026 All-Source RFP. The Company has engaged with Commission Staff and Stakeholders to solicit feedback regarding the IE RFP, the Company's IE scoring criteria, and the candidate most experienced and competent to perform the IE's required duties at a reasonable cost. Following collaborative and productive

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¹ Commission Special Public Meeting – LC 78 Idaho Power IRP Decision of Acknowledgement (Dec. 6, 2022), available at: https://oregonpuc.granicus.com/player/clip/1058?view_id=2&redirect=true&h=02ecd2462c38d0b96694b1c337989cd0.

1 discussions with Commission Staff and Stakeholders, Idaho Power recommends the Commission
2 approve selection of London Economics International, LLC as IE for the 2026 All-Source RFP.

3 **II. PROCEDURE**

4 Idaho Power filed its application to open an IE selection docket on September 15, 2022.
5 The Company shared an initial IE RFP with interested intervenors, solicited feedback at the
6 October 19, 2022, workshop, and requested any additional recommendations for invited IE
7 candidates. Idaho Power issued a final IE RFP on November 1, 2022, incorporating input from
8 Commission Staff and Stakeholders. The Company received five responsive bids from interested
9 IE candidates by the November 15, 2022, deadline. Idaho Power subsequently held a confidential
10 workshop with interested intervenors on December 1, 2022, to review bids and exchange
11 recommendations on preferred IE candidates. The Company requested and received additional
12 feedback from Commission Staff and Stakeholders following the December 1, 2022, workshop.

13 **III. IDAHO POWER'S RECOMMENDED IE CANDIDATE**

14 Idaho Power evaluated a total of five IE candidates. All bids were evaluated based upon
15 an assessment of each IE candidate's RFP oversight experience, understanding of an IE's role
16 and responsibilities under the Commission's Competitive Bidding Rules, and demonstrated
17 technical and topical experience. In addition, bids were evaluated based on the overall cost of the
18 project, the overall elements of that cost, and the overall appropriateness of the submitted costs
19 in relation to the submitted proposal. Finally, the bids were evaluated based on the IE candidate's
20 adherence to the terms and conditions of Idaho Power's Professional Services Agreement. The
21 not to exceed bid of each proposal was considered to create a composite score for each IE
22 candidate.

23 Idaho Power shared the results from the Company's evaluation with Commission Staff
24 and Stakeholders on November 29, 2022, and at the December 1, 2022, workshop. The Company
25 determined that all five IE candidates possessed the necessary experience to perform the duties
26 associated with oversight of the 2026 All-Source RFP, but London Economics International, LLC

1 received the highest cumulative weighted score. Accordingly, Idaho Power supports selection of
2 any of the five IE candidates—with a preference for London Economics International, LLC.

3 Idaho Power requests the Commission’s approval to engage the services of London
4 Economics International, LLC, who received support from both the Company and participating
5 Stakeholders. London Economics International, LLC has demonstrated experience as an IE in
6 other jurisdictions. Moreover, based on additional communications with London Economics
7 International, LLC at the request of Commission Staff, London Economics International, LLC
8 shows a clear understanding of the IE’s duties as expressed in the Commission’s Competitive
9 Bidding Rules, OAR 860-089-0450. Finally, London Economics International, LLC’s proposal
10 reflects the most reasonable cost to customers.

11 **IV. CONCLUSION**

12 Idaho Power respectfully requests that the Commission approve selection of London
13 Economics International, LLC as the IE for Idaho Power’s 2026 All-Source RFP. Following a
14 Commission decision, Idaho Power will engage the Commission-approved IE and will remain
15 responsible for all fees and expenses associated with engaging an IE as mandated under
16 OAR 860-089-0200(3). The Company also intends to file a deferral to recover these costs.
17 Following engagement with the IE, Idaho Power will invite feedback on its bid scoring and
18 modeling methodology proposal (Attachment D to Idaho Power’s Application to Open the
19 Independent Evaluator Selection Docket) and will work with the IE to prepare the draft 2026 All-
20 Source RFP to be filed for Commission approval.

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Respectfully submitted this 8th day of December 2022.

DATED: December 8, 2022

McDOWELL RACKNER GIBSON PC



Lisa Rackner
Adam Lowney
McDowell Rackner Gibson PC
419 SW 11th Avenue, Ste 400
Portland, Oregon 97205
Telephone: (503) 595-3925
Email: dockets@mrg-law.com

IDAHO POWER COMPANY

Donovan Walker
Idaho Power Company
1221 W. Idaho Street
P.O. Box 70
Boise, Idaho 83707-0070
Telephone: (208) 388-5317
E-mail: dwalker@idahopower.com
dockets@idahopower.com

Attorneys for Idaho Power Company