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January 25, 2024

VIA ELECTRONIC FILING

puc.FilingCenter@puc.oregon.gov

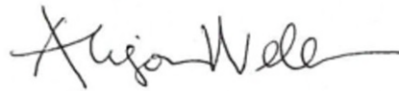
Public Utility Commission of Oregon
Filing Center
P.O. Box 1088
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket No. AR 660 – Resource Adequacy Rules

Attention Filing Center:

Attached for filing in the above-referenced docket is a copy of Idaho Power Company's Comments. Feel free to contact me at (208) 388-2872 with any questions.

Sincerely,



Alison Williams
Regulatory Policy and Strategy Leader
Idaho Power Company

AW:cd
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 660

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Adoption of Rules Relating to Resource
Adequacy.

**IDAHO POWER COMPANY
COMMENTS**

1 **I. INTRODUCTION**

2 On September 21, 2023, the Public Utility Commission of Oregon (“OPUC” or
3 “Commission”) approved Commission Staff’s recommendation to open a formal rulemaking on
4 resource adequacy. Idaho Power Company (“Idaho Power” or “Company”) was an active
5 participant in the resource adequacy investigation (UM 2143), in which the draft rules for this
6 rulemaking were developed.

7 In the investigation phase, the Company provided several rounds of conceptual and
8 educational comments about resource adequacy, the function and design of the Western Resource
9 Adequacy Program (“WRAP”) (to which Idaho Power is committed), and how WRAP is
10 necessarily different from a utility’s long-term planning as conducted through the Integrated
11 Resource Plan (“IRP”) process. The purpose of the Company’s comments in UM 2143 was to help
12 Staff draft a reasonable set of rules that accurately reflect WRAP—the one regional program that
13 exists on which Staff based the rule language.

14 Idaho Power also provided redline edits and comments on the draft rules. Staff, within UM
15 2143, considered and incorporated many of Idaho Power’s comments and edits. However, the draft
16 rules continue to reflect several misstatements that will likely lead to confusion if the rules are

1 adopted as currently drafted. These language issues are the focus of Idaho Power’s comments
2 herein.

3 To be clear, Idaho Power considers the draft rules a reasonable set of requirements and
4 does not take issue with the scope or intent of the rules – the Company agrees that resource
5 adequacy is vital and understands that the Commission desires to monitor the progress toward
6 resource adequacy of those that it regulates.

7 Idaho Power believed there would be sufficient time in the rulemaking to ensure precision
8 of language with the draft rules, as this is the type of activity that routinely occurs in rulemakings.
9 This does not seem to be the case here. Rather, this rulemaking has been truncated, with a single
10 hearing, no workshops, a single comment period, and a denial to extend the comment period. As
11 a result, Idaho Power considers these comments its last opportunity to draw attention to concerning
12 language issues within the rules, and the Company would implore the Commission to take
13 seriously what may appear as minor and insignificant language changes but which are, in fact,
14 critical for these resource adequacy rules to endure – and endure without confusion.

15 II. RECOMMENDED CHANGES TO DEFINITIONS

16 A. Definition (g): Regional Forward Showing

17 The Company proposes a modification to the definition of “Regional Forward Showing.”
18 As Idaho Power has commented before, WRAP (the “Qualified Regional Program” in question)
19 is actually two distinct elements—a Forward Showing program and an Operations program.
20 Because the proposed resource adequacy rules only focus on the forward showing work, it is not
21 appropriate for Regional Participants to provide both forward showing *and* operations “data,
22 forecasts, or submittals” as required for compliance with a Qualified Regional Program. As such,

1 the Company proposes an addition to definition (g) that distinguishes a Regional Forward Showing
2 to *only* include data that support forward showing, or planning, program compliance:

3 *g. “Regional Forward Showing” means any data, forecasts, or submittals required by a*
4 *Qualified Regional Program to support **planning** program compliance by a Regional*
5 *Participant.*

6 **B. Definition (m): Informational Filing**

7 The Company also proposes modifications to the definition of “Informational Filing”. The
8 Company’s proposed modifications intend to simplify and clarify the meaning and purpose of an
9 “Informational Filing” as a definition. The drafted definition includes a general requirement for
10 “...all underlying or related data needed to support such explanation”. As a matter of good practice,
11 definitions should not also state requirements. Rather, requirements should be distinct from
12 definitions. And, indeed, the draft rules separately identify what “must” be submitted as part of an
13 Informational Filing. For clarity and refinement, the Company proposes to strike text from the
14 definition as follows:

15 *m. “Informational Filing” means a written explanation of a Load Serving Entity’s strategy*
16 *to address Resource Adequacy. ~~and all underlying or related data needed to support such~~*
17 *~~explanation.~~*

18 **III. RECOMMENDED CHANGES TO ELECTRIC COMPANY INFORMATIONAL**
19 **FILING REQUIREMENTS**

20 **A. Rule section (3)(b)(A): Informational Filing Data Requirements**

21 In Section (3)(b)(A), the draft rules identify the type and extent of detailed analysis that
22 must be supplied, and the associated methodology for producing such analysis. As drafted, this
23 part of the rule language confuses incomparable data streams and analyses. Specifically, Electric
24 Companies are asked to provide information that “uses methods consistent with outputs of the

1 Qualified Regional Program’s Advisory Forecast.” This reference to the Advisory Forecast is the
2 source of confusion. As the Company has endeavored to explain before in UM 2143, Idaho Power
3 is aware of only one modeling output that would qualify as the “Advisory Forecast” – that is the
4 Western Power Pool’s (“WPP”) Advisory Forward Showing Planning Reserve Margin (“Advisory
5 FSPRM”).

6 For each WRAP summer and winter operating season, WPP conducts an Annual
7 Assessment that includes Loss of Load Expectation (“LOLE”) and Effective Load Carrying
8 Capability (“ELCC”) studies for the WRAP footprint and subregions. From this Annual
9 Assessment, WPP produces an Advisory FSPRM for each WRAP subregion. No information from
10 this output is specific to individual participant capacity or load. Rather, the Advisory FSPRM is a
11 single planning reserve margin (“PRM”) outlook for the entire subregion.

12 Considering the above, the information the Company would supply about its own P50 load
13 forecast and Company-specific ELCCs would be incomparable to the subregional information in
14 the Advisory FSPRM. It is entirely possible that the Advisory FSPRM changes in the future and
15 that it produces different data streams.

16 Additionally, the time-based requirement to provide the “greater of” number of years’
17 worth of information has the potential to require data for a longer duration than the Advisory
18 FSPRM is available. If the rules are intended to draw comparisons to this forecast, then the data
19 should be provided for matching time periods.

20 Finally, it is worth noting that the Advisory FSPRM is developed based on submissions by
21 Regional Participants. Rather than ask for information consistent with the *outputs* of the Advisory
22 Forecast, the best information to submit is what each Participant *provided* to WPP to form the

1 forecast. Simply put, the rules should require Regional Participants to provide their inputs to the
2 Advisory forecast, not information consistent with its outputs.

3 With these objectives in mind, Idaho Power proposes the following refinements to subpart
4 (A) of the Informational Filing requirements:

5 A. *Qualified Regional Program data as provided by the Regional Participant that was*
6 *developed for utilization in ~~A monthly P50 Peak Load Forecast and Effective Load~~*
7 *~~Carrying Capability curve over a period of the greater of four years or the longest~~*
8 *~~available time timeline from a Qualified Regional Program using methods consistent with~~*
9 *~~the outputs of the Qualified Regional Program's Advisory Forecast; and mirrors the~~*
10 *number of years of information provided in the Advisory Forecast.*

11 **B. Rule section (3)(b)(B): Informational Filing Transmission Requirements**

12 As introduced above, the Advisory FSPRM produces a limited amount of information—
13 and that does not include anything about transmission rights. But, transmission rights *are* a
14 consideration within WRAP's Forward Showing. As such, this part of the rules should align to the
15 near-term forward showing seasons and not beyond. Additionally, transmission rights may be
16 secured through individual agreements under development or which are confidential. The
17 “discussion” supplied should specifically note that a breach of confidentiality is not required to
18 satisfy the requirement. Finally, and as a reminder, WRAP is based on two seasons of the year and
19 is not a year-round program. Subpart (B) should align with the seasonal aspect of WRAP.

20 Considering the above, the Company offers the following proposed modifications:

21 B. A *high-level discussion, not to include confidential information, ~~covering at least four~~*
22 *years of the transmission rights necessary to serve P50 load, the transmission rights*
23 *currently owned or used, the steps that will be taken to procure transmission rights to fill*

1 *any open position, and any expected constraints or difficulties in filling any open positions.*

2 *The information supplied should cover the time period of the two forthcoming Qualified*

3 *Regional Program operating seasons.*

4 **C. Rule section (3)(b)(C): Informational Filing Resource Adequacy Comparison**

5 This subpart sets up a direct comparison between a Qualified Regional Program’s Advisory
6 Forecast and an individual utility’s Integrated Resource Plan (“IRP”) process. The Company
7 believes the intent of this subpart is to compare inputs not outputs, similar to the comments above.
8 Idaho Power feels confident it can provide meaningful explanations of any differences between
9 what it supplies to WPP to create the Advisory Forecast and can then distinguish those inputs from
10 what is used within the Company’s IRP.

11 . As such, the Company offers the following suggestions:

12 *C. A description of information supplied to produce the Advisory Forecast and explanation*
13 *of any differences between that information and comparable inputs to ~~any notable~~*
14 *~~deviations between the load forecast, Qualified Capacity Contributions, or Planning~~*
15 *~~Reserve Margin contained in a Qualified Regional Program’s Advisory Forecast and what~~*
16 *~~is used in~~ the Electric Company’s Integrated Resource Plan analysis and associated action*
17 *plan.*

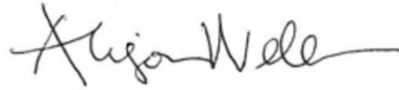
18 **IV. CONCLUSION**

19 Idaho Power appreciates the opportunity to provide these comments. Should the detailed
20 nature of the Company’s language edits necessitate a workshop or an additional round of reply
21 comments, the Company would welcome the opportunity. Idaho Power’s primary objective in this
22 rulemaking is to ensure the establishment of clear, workable, and logical rules that will not create

- 1 confusion at the time of reporting and compliance nor require additional interpretation or
- 2 refinement at a later date.

DATED: January 25, 2024

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Alison Williams", with a long horizontal flourish extending to the right.

Alison Williams
Regulatory Policy and Strategy Leader
Idaho Power Company