

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 78

In the Matter of

IDAHO POWER COMPANY,

2021 Integrated Resource Plan.

THE RENEWABLE ENERGY
COALITION’S FINAL COMMENTS

I. INTRODUCTION

The Renewable Energy Coalition (the “Coalition”) respectfully submits these Final Comments for consideration by the Oregon Public Utility Commission (the “Commission” or “OPUC”) in the matter of Idaho Power Company’s (“Idaho Power’s”) 2021 Integrated Resource Plan (“IRP”). The Coalition continues to support its recommendations in its Opening Comments regarding qualifying facility (“QF”) renewal assumptions and does not repeat those recommendations here. In these Final Comments, the Coalition supports Staff’s recommendation related to future QFs. Therefore, the Commission should acknowledge the QF renewal planning assumptions in this IRP, direct Idaho Power to revisit the wind QF renewal assumption during the next IRP, and adopt Staff’s recommendation related to future QFs.

II. COMMENTS

In Staff’s Opening Comments, Staff recommends Idaho Power “assum[e] no growth in QFs in the first four years and then apply a forecast of future QF development informed by past QF activity and expanded transmission beginning in the fifth year of

planning.”¹ The Coalition believes accurate planning of QF assumptions, whether renewing QFs or future QFs, is important to forecast.

There are a number of reasonable ways in which future QF development can be forecast. At this time, the Coalition supports Staff’s recommendation and believes it is sufficient for this specific IRP. The Coalition recommends the Commission adopt Staff’s recommendation related to future QF planning assumptions and direct Idaho Power to work with stakeholders in future IRPs to develop a reasonable forecast of future QF development.

III. CONCLUSION

The Commission should acknowledge Idaho Power’s assumptions regarding QF renewals, direct Idaho Power to revisit its planning assumptions for wind QF renewals during the next IRP, and adopt Staff’s recommendation related to future QF planning assumptions.

¹ Staff’s Opening Comments at 25 (July 7, 2022).

Dated this 8th day of September 2022.

Respectfully submitted,

Sanger Law, PC

A handwritten signature in cursive script that reads "Ellie Hardwick". The signature is written in black ink and is positioned above a horizontal line.

Ellie Hardwick

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