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February 22, 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: Docket LC 78 – In the Matter of Idaho Power Company, 2021 Integrated Resource Plan.

Attention Filing Center:

Attached for filing in the above-referenced docket is Idaho Power Company's Response to Staff's Motion for Waiver Under OAR 860-027-0400 and Extension of Time.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads 'Suzanne Prinsen'.

Suzanne Prinsen
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 78

In the Matter of

IDAHO POWER COMPANY,
2021 Integrated Resource Plan.

**IDAHO POWER COMPANY'S RESPONSE
TO STAFF'S MOTION FOR WAIVER
UNDER OAR 860-027-0400 AND
EXTENSION OF TIME**

I. INTRODUCTION

Pursuant to OAR 860-001-0420, Idaho Power Company ("Idaho Power" or "Company") files this response to Staff's Motion for Waiver Under OAR 860-027-0400 and Extension of Time, offering context for the discussions between Staff and Idaho Power and an alternate extension timeline.

II. RESPONSE

Idaho Power greatly values its relationship with Staff. The Company has always appreciated Staff's active and thoughtful engagement in its cases before the Commission. For the Integrated Resource Plan (IRP), in particular, Staff has consistently provided meaningful, high-quality analysis. For these reasons, Idaho Power does not object to a partial delay of Staff's review of the Company's 2021 IRP. The Company's primary concern with Staff's waiver request is the length of the requested extension. Under the Commission's rules, Staff and intervenor comments on the 2021 IRP are due on June 30, 2022; Staff is asking that they be allowed to file their comments on October 17, 2022. While a schedule has not yet been adopted in this docket (and Staff is asking that the prehearing conference not be held until late April), such an extension is certain to result in a Commission order that is significantly delayed. This result is problematic

1 for Idaho Power given its need to keep its IRP on a biennial schedule in Idaho ¹

2 One of the reasons that Staff is requesting the extension is because Idaho Power did not
3 file Appendix D until February 16, 2022, and Staff believes that it could not begin to vet the
4 assumptions and analyses in the IRP until that information was received. Idaho Power
5 acknowledges that Appendix D provides additional information related to the Boardman to
6 Hemingway Transmission Line. The Company understands and agrees that Staff should have
7 a thorough opportunity to review and vet Appendix D. To this end, when Staff conferred with
8 counsel for Idaho Power regarding its request for an extension, Idaho Power stated it would
9 support an extension of the comment deadline until six months after March 1, or two weeks after
10 Appendix D was filed.

11 Staff also points out that it is very busy right now, and that it cannot prioritize work in Idaho
12 Power's IRP over other dockets. Idaho Power does not dispute that Staff has very significant
13 demands on its time, and for that reason, offered to support an extension of the comment period
14 until August 31. However, contrary to Staff's suggestion, it is not a simple matter for Idaho Power
15 to begin a new IRP before the last one has been reviewed. In fact, when circumstances required
16 Idaho Power to request delays of its 2019 IRP, Staff voiced concern about the effect that the
17 overlap of the 2019 and 2021 IRP would have on participants in those processes. In response,
18 Idaho Power modified the start of its 2021 IRP schedule to minimize the amount of overlap in IRP
19 cycles.

20 Idaho Power acknowledges that its last IRP process was the source of substantial delays,
21 which were necessary to address modelling and data issues. Idaho Power apologizes if these
22 delays created hardships for Staff or other parties. Recognizing that the Company did cause

¹ Idaho Public Utilities Commission Order No. 30317 requires Idaho Power to file its IRP by June 30th in odd-numbered years. To meet this deadline, Idaho Power must begin meeting with planning participants no later than early September of even-numbered years.

1 delays with the 2019 IRP, Idaho Power offered what it believed was a reasonable compromise
2 solution for Staff's review to begin on March 1, 2022—two months after the Company filed the
3 2021 IRP on December 30, 2021, and two weeks after the Company filed Appendix D.

4 The Company would like to be clear that it remains willing to work with Staff on an
5 extension of Staff's 2021 IRP review. The Company can support an extension until August 31,
6 2022, to ensure that Staff has more than a full six-month period to review the complete IRP,
7 including Appendix D. This review period offers Staff nearly all the time it requests but still
8 prevents an overlap of IRP cycles.

9 Finally, the Company may not fully appreciate the magnitude of Staff's workload. If these
10 issues are so substantial that a compromise timeline cannot be achieved, the Company will not
11 object to the Commission's decision to grant the extension as requested by Staff if it feels those
12 burdens outweigh the resulting impacts on the IRP process.

13 Respectfully submitted this 22nd day of February 2022.

MCDOWELL RACKNER GIBSON PC



Lisa F. Rackner

IDAHO POWER COMPANY

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