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October 28, 2015

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UM 1725 – In the Matter of IDAHO POWER COMPANY Application to Lower
Standard Contract Eligibility Cap and to Reduce the Standard Contract Term**

Attention Filing Center:

Attached for filing in the above-referenced docket is an electronic copy of Idaho Power Company's Motion for Leave to File Supplemental Testimony and the Supplemental Reply Testimony of Randy Allphin.

Please contact this office with any questions.

Very truly yours,

Handwritten signature of Wendy McIndoo in blue ink.

Wendy McIndoo
Office Manager

Enclosures

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1725**

4 In the Matter of
5 IDAHO POWER COMPANY
6 Application to Lower Standard Contract
7 Eligibility Cap and to Reduce the
Standard Contract Term.

**IDAHO POWER COMPANY'S MOTION
FOR LEAVE TO FILE SUPPLEMENTAL
TESTIMONY**

8 Pursuant to OAR 860-001-0420, Idaho Power Company ("Idaho Power" or
9 "Company") hereby submits to the Public Utility Commission of Oregon ("Commission")
10 this Motion for Leave to File Supplemental Testimony.

11 The Company's Supplemental Reply Testimony of Randy Allphin, which is
12 attached to this motion, updates data already in the record describing the status of QF
13 development on Idaho Power's system.¹ Since the Company filed its reply testimony on
14 September 18, 2015, there have been significant changes in the number of executed QF
15 contracts and outstanding QF proposals in its Idaho and Oregon jurisdictions. The
16 Company's supplemental testimony is highly relevant to the issues in this proceeding and
17 will ensure that the Commission's decision in this case is based on an up-to-date and
18 accurate record.

19 The Company commits to responding to any data requests related to its
20 supplemental testimony on an expedited basis.

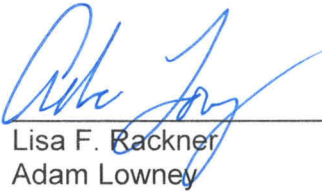
21 For these reasons, Idaho Power requests that the Commission grant this motion
22 and accept the attached testimony for filing.

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26 ¹ See Idaho Power/106.

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Respectfully submitted this 28th day of October, 2015.

MCDOWELL RACKNER & GIBSON PC



Lisa F. Rackner
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IDAHO POWER COMPANY

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 1725

In the Matter of)
)
IDAHO POWER COMPANY,)
)
Application to Lower Standard Contract)
Eligibility Cap and to Reduce the Standard)
Contract Term, for Approval of Solar)
Integration Charge, and for Change in)
Resource Sufficiency Determination.)
_____)

IDAHO POWER COMPANY
SUPPLEMENTAL REPLY TESTIMONY
OF
RANDY ALLPHIN

October 28, 2015

1 **Q. Please state your name and business address.**

2 A. My name is Randy Allphin. My business address is 1221 West Idaho Street, Boise,
3 Idaho 83702.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company (“Idaho Power” or “Company”) as the Energy
6 Contracts Coordinator Leader.

7 **Q. Are you the same Randy Allphin that filed Direct Testimony in this matter?**

8 A. Yes.

9 **Q. What is the purpose of your supplemental reply testimony?**

10 A. The purpose of my supplemental reply testimony is to update the Public Utility
11 Commission of Oregon (“Commission”) and the parties regarding factual
12 developments that have occurred since the Company filed its reply testimony on
13 September 18, 2015. Since that date, there have been significant changes in the level
14 of QF development in both Idaho and Oregon. The purpose of my supplemental
15 testimony is simply to update the current level of QF development facing the Company.

16 **Q. Have you prepared an exhibit summarizing the changes that have occurred?**

17 A. Yes. Attached to this testimony is an exhibit (Idaho Power/501) that describes the
18 current status, as of October 22, 2015, of all of the QF projects that were proposed as
19 of May 18, 2015, along with an updated list of new QF projects that were not included
20 in the Company’s previous testimony.¹ This exhibit shows that while this case has
21 been pending, Idaho Power has been required to execute additional Oregon QF solar
22 contracts. In addition, in both Oregon and Idaho, the Company has received new solar
23 QF proposals, while numerous other solar QF proposals have been formally withdrawn
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25 ¹ In my direct testimony I included a similar table as of April 18, 2015. See Idaho Power/106.
26 Through discovery, the Company provided the same information as of May 18, 2015. Therefore,
the updated table is based on the information provided to the parties as of May 18, 2015.

1 or labeled “inactive” due to an extended period of inactivity, which coupled with the
2 current changes in QF regulations, indicate that these QF projects are most likely not
3 being actively developed at this time.

4 **Q. Please describe the changes that have occurred in Idaho.**

5 A. As I discussed in my reply testimony, on August 15, 2015, the Idaho Public Utilities
6 Commission (“IPUC”) issued its final order reducing the Company’s maximum contract
7 term from 20 to two years for solar and wind projects with greater than 100 kW
8 nameplate rating.² Following the IPUC final order Idaho Power contacted the
9 developers for all Idaho proposed projects that had received indicative pricing and
10 informed them that the previous indicative pricing was no longer valid. We instructed
11 the developers that if they wished to proceed with their projects, and receive new two
12 year indicative pricing proposals, they needed to inform Idaho Power of such desire
13 no later than September 23, 2015. As of the date of my reply testimony (September
14 18, 2015) only one 80 MW project had notified Idaho Power that it did *not* wish to
15 proceed with its proposed project.

16 **Q. Since September 18, 2015, have other developers also indicated that they no
17 longer intend to pursue QF contracts with for projects located in Idaho?**

18 A. Yes. Developers either affirmatively withdrew their projects or did not respond, in
19 which case Idaho Power advised the non-responsive developer that its lack of
20 response was assumed to be a withdrawal. As shown on Idaho Power/501, of the
21 original 1,081 MW of Idaho solar QFs in development as of May 18, only two projects
22 totaling 40 MW are still active. Neither of these projects have an executed contract.

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26 ² *In the Matter of Idaho Power Company’s Petition to Modify Terms and Conditions of PURPA
Purchase Agreements*, Case No. IPC-E-15-01, Order No. 33357 (Aug. 20, 2015).

1 **Q. Since the IPUC issued its order shortening the contract term, has the Company**
2 **received any additional requests for contracts in Idaho?**

3 A. Yes. On August 31, 2015, the Company received a request for a contract for a 16 MW
4 solar project proposal, which has an estimated two year contractual obligation of
5 \$2,300,000. This newly proposed project has provided a complete request for
6 negotiated avoided cost values.

7 **Q. Please describe the changes that have occurred in Oregon.**

8 A. Two important developments have occurred since I filed my reply testimony on
9 September 18. First, as required by the interim relief required by Order 15-199, the
10 Company executed and filed with the Commission nine negotiated solar QF contracts,
11 which have a total nameplate capacity of 69 MW. These nine contracts consist of
12 three projects from Gardner Capital and six projects from Pacific Northwest Solar. For
13 these nine projects, there is an estimated contract obligation of approximately
14 \$200,000,000 for the 20-year term.

15 In addition to these nine QFs, there is also one additional 10 MW solar QF that
16 had requested a contract in April that is still actively being developed, but has not yet
17 executed a contract. Thus, of the 265 MW of solar projects actively seeking contracts
18 as of May 2018, 69 MW (26%) is now under contract and 10 MW is still being actively
19 pursued.

20 **Q. What is the second important development in Oregon?**

21 A. On September 15, 2015, the Company received new Oregon proposals from 10 QFs,
22 with a total nameplate capacity of 77.4 MW. Of these 10 QF projects, eight are greater
23 than 3 MW and are therefore ineligible for standard contracts under the Commission's
24 interim relief set forth in Order No. 15-199. All of the 10 projects have a scheduled
25 operation date of July 31, 2017. These 10 QFs have an estimated 20-year contractual
26 obligation of approximately \$224,000,000, as compared to a two-year estimated

1 obligation of \$11,600,000. All of these projects have requested interconnection with
2 Idaho Power and one has also requested negotiated avoided costs. When this
3 additional 77.4 MW is added to the 69 MW that is now under contract—the total volume
4 of solar QF generation that the Company now has under development equals 146.4
5 MW. This number represents over 55% of the 265 MW of solar project originally
6 proposed—all of which has been either executed or initiated after the Commission
7 issued the order for interim relief.

8 **Q. Does this conclude your testimony?**

9 A. Yes.

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Idaho Power/501
Witness: Randy Allphin

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Supplemental Reply Testimony of Randy Allphin

October 28, 2015

Idaho Power Company Proposed PURPA Solar - As of May 18, 2015 Idaho											Updated as of October 22, 2015	
Project Name	Project Developer	MWac	Term (Years)	State	Indicative Pricing request or an ESA Request Date	Date a draft ESA was provided	Date a final ESA was provided	Estimated Operation Date	Estimated Obligation (includes integration)	Estimated 2 Year Obligation (includes integration)	Status	Active Proposed MW
Project A1	Developer A	80	20	Idaho	06/30/2014	9/5/2014	No	12/01/16	\$213,159,625	\$9,052,344	Withdrawn	
Project A2	Developer A	28	20	Idaho	07/28/2014	No	No	12/01/16	\$62,482,130	\$2,843,077	Inactive	
Project A3	Developer A	30	20	Idaho	Other Inquiry	No	No	12/31/16	\$40,316,768	\$2,110,838	Inactive	
Project A4	Developer A	30	20	Idaho	Other Inquiry	No	No	12/31/16	\$40,316,768	\$2,110,838	Withdrawn	
Project B1	Developer B	20	20	Idaho	10/10/2014	No	No	10/30/16	\$48,378,647	\$2,408,124	Withdrawn	
Project B2	Developer B	20	20	Idaho	10/10/2014	No	No	10/30/16	\$45,549,075	\$2,277,533	Withdrawn	
Project C1	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$53,382,246	\$2,318,923	Withdrawn	
Project C2	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$53,283,030	\$2,337,229	Withdrawn	
Project C3	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$49,203,964	\$2,150,196	Withdrawn	
Project C4	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$49,360,962	\$2,148,558	Withdrawn	
Project C5	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$48,760,343	\$2,084,643	Withdrawn	
Project C6	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$51,486,567	\$2,208,705	Withdrawn	
Project C7	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$51,493,788	\$2,178,763	Withdrawn	
Project C8	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$51,355,246	\$2,169,541	Withdrawn	
Project C9	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$51,797,625	\$2,148,386	Withdrawn	
Project C10	Developer C	20	20	Idaho	12/18/2014	No	No	12/31/16	\$48,438,230	\$2,048,049	Withdrawn	
Project D1	Developer D	6	20	Idaho	03/20/2015	No	No	12/31/16	\$8,063,354	\$422,168	Withdrawn	
Project D2	Developer D	7.5	20	Idaho	03/20/2015	No	No	12/31/16	\$10,079,192	\$527,709	Withdrawn	
Project D3	Developer D	10	20	Idaho	03/02/2015	No	No	12/31/16	\$14,413,193	\$810,279	Withdrawn	
Project D4	Developer D	10	20	Idaho	03/02/2015	No	No	12/31/16	\$14,412,285	\$806,685	Withdrawn	
Project E1	Developer E	13	20	Idaho	Other Inquiry	No	No	12/31/16	\$17,470,600	\$914,696	Withdrawn	
Project E2	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E3	Developer E	13	20	Idaho	Other Inquiry	No	No	12/31/16	\$17,470,600	\$914,696	Withdrawn	
Project E4	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E5	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E6	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E7	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E8	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E9	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E10	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E11	Developer E	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project E12	Developer E	13	20	Idaho	Other Inquiry	No	No	12/31/16	\$17,470,600	\$914,696	Withdrawn	
Project F1	Developer F	70	20	Idaho	Other Inquiry	No	No	12/31/16	\$94,072,460	\$4,925,289	Inactive	
Project G1	Developer G	3	20	Idaho	Other Inquiry	No	No	12/31/16	\$4,031,677	\$211,084	Inactive	
Project H1	Developer H	1	20	Idaho	06/02/2014	No	No	12/31/16	\$1,343,892	\$70,361	Inactive	
Project I1	Developer I	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Inactive	
Project B3	Developer B	20	5	Idaho	01/28/2015	No	No	12/31/16	\$42,588,215	\$2,059,783	Withdrawn	
Project B4	Developer B	20	5	Idaho	01/28/2015	No	No	12/31/16	\$42,415,239	\$2,053,467	Withdrawn	
Project B5	Developer B	50	5	Idaho	01/28/2015	No	No	12/31/16	\$103,750,045	\$4,820,801	Withdrawn	
Project B6	Developer B	40	5	Idaho	01/28/2015	No	No	12/31/16	\$80,232,480	\$3,666,449	Withdrawn	
Project D5	Developer D	10	20	Idaho	02/17/2015	No	No	12/31/16	\$19,377,901	\$1,001,813	Withdrawn	
Project D6	Developer D	10	20	Idaho	02/17/2015	No	No	12/31/16	\$18,700,526	\$968,550	Withdrawn	
Project L1	Developer L	28	20	Idaho	Other Inquiry	No	No	12/31/16	\$37,628,984	\$1,970,115	Inactive	
Project L2	Developer L	28	20	Idaho	01/22/2015	No	No	12/31/16	\$37,628,984	\$1,970,115	Inactive	
Project L3	Developer L	80	20	Idaho	02/02/2015	No	No	12/31/16	\$107,511,382	\$5,628,901	Inactive	
Project O1	Developer O	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Active	20
Project O2	Developer O	20	20	Idaho	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Active	20
Subtotal		1081							\$1,969,960,769	\$94,140,109		40

Idaho Power Company Proposed PURPA Solar - As of May 18, 2015 Oregon											Updated As of October 22, 2015	
Project Name	Project Developer	MWac	Term (Years)	State	ESA Request Date	Date a draft ESA was provided	Date a final ESA was provided	Estimated Operation Date	Estimated Obligation	Estimated 2 Year Obligation	Status	Active Proposed MW
Project J1	Developer J	10	20	Oregon	11/11/2014	12/2/2014	No	06/15/16	\$30,325,795	\$2,008,461	Withdrawn	
Project E13	Developer E	20	20	Oregon	Other Inquiry	No	No	12/31/16	\$26,877,846	\$1,407,225	Withdrawn	
Project K1	Developer K	10	20	Oregon	11/12/2013	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K2	Developer K	10	20	Oregon	Other Inquiry	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K3	Developer K	10	20	Oregon	11/12/2013	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K4	Developer K	10	20	Oregon	Other Inquiry	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K5	Developer K	10	20	Oregon	09/19/2013	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K6	Developer K	10	20	Oregon	Other Inquiry	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K7	Developer K	10	20	Oregon	08/23/2013	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K8	Developer K	10	20	Oregon	Other Inquiry	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K9	Developer K	10	20	Oregon	Other Inquiry	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project K10	Developer K	10	20	Oregon	08/23/2013	No	No	12/31/16	\$31,934,668	\$2,186,583	Inactive	
Project M1	Developer M	5	20	Oregon	04/07/2015	No	No	12/31/16	\$15,967,334	\$1,093,292	Withdrawn	
Project M2	Developer M	10	20	Oregon	04/07/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Withdrawn	
Project M3	Developer M	10	20	Oregon	04/07/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project M4	Developer M	5	20	Oregon	04/07/2015	No	No	12/31/16	\$15,967,334	\$1,093,292	Signed Contract	
Project M5	Developer M	10	20	Oregon	04/07/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Withdrawn	
Project M6	Developer M	10	20	Oregon	05/06/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project N1	Developer N	5	20	Oregon	04/16/2015	No	No	12/31/16	\$15,967,334	\$1,093,292	Signed Contract	
Project N2	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Withdrawn	
Project N3	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project N4	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project N5	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project N6	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project N7	Developer N	6	20	Oregon	04/27/2015	No	No	12/31/16	\$19,160,801	\$1,311,950	Withdrawn	
Project N8	Developer N	4	20	Oregon	04/27/2015	No	No	12/31/16	\$12,773,867	\$874,633	Withdrawn	
Project N9	Developer N	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Signed Contract	
Project P1	Developer P	10	20	Oregon	04/27/2015	No	No	12/31/16	\$31,934,668	\$2,186,583	Active	10
Subtotal		265							\$807,668,339	\$54,800,389		10
Total		1,346							\$2,777,629,108	\$148,940,498		

Signed Contracts and New Project requests since the filing of the reponse to Staff discovery request 5, Updated as of October 22, 2015

Signed contracts

Project Name	Project Developer	MWac	Term (Years)	State	ESA Request Date	Date a draft ESA was provided	Date a final ESA was provided	Estimated Operation Date	Estimated 20 Year Obligation	Estimated 2 Year Obligation	Status	MW of final signed contract
Project M3	Developer M	10	20	Oregon	04/07/2015	9/28/2015	9/28/2015	12/31/16	\$29,386,410	\$1,672,691	Signed Contract	10
Project M4	Developer M	5	20	Oregon	04/07/2015	9/28/2015	9/28/2015	12/31/16	\$14,553,402	\$824,613	Signed Contract	5
Project M6	Developer M	10	20	Oregon	05/06/2015	9/28/2015	9/28/2015	12/31/16	\$29,742,547	\$1,687,765	Signed Contract	10
Project N1	Developer N	5	20	Oregon	04/16/2015	7/28/2015	9/9/2015	12/31/16	\$13,358,301	\$767,881	Signed Contract	5
Project N3	Developer N	10	20	Oregon	04/27/2015	8/3/2015	9/9/2015	12/31/16	\$10,652,073	\$609,223	Signed Contract	4
Project N4	Developer N	10	20	Oregon	04/27/2015	8/3/2015	9/9/2015	12/31/16	\$29,913,809	\$1,704,151	Signed Contract	10
Project N5	Developer N	10	20	Oregon	04/27/2015	8/3/2015	9/9/2015	12/31/16	\$29,940,932	\$1,695,286	Signed Contract	10
Project N6	Developer N	10	20	Oregon	04/27/2015	8/3/2015	9/9/2015	12/31/16	\$13,378,588	\$760,665	Signed Contract	5
Project N9	Developer N	10	20	Oregon	04/27/2015	8/3/2015	9/9/2015	12/31/16	\$29,880,577	\$1,701,577	Signed Contract	10
Subtotal									\$200,806,639	\$11,423,852		69

New Project Requests

Project Name	Project Developer	MWac	Term (Years)	State	ESA Request Date	Date a draft ESA was provided	Date a final ESA was provided	Estimated Operation Date	Estimated 20 Year Obligation	Estimated 2 Year Obligation	Status	Active Proposed MW
Project M7	Developer M	16	2	Idaho	08/31/2015			12/30/2016	N/A	\$2,338,515	Active	16
Project P2	Developer P	10	20	Oregon	09/15/2015			07/31/17	\$29,010,268	\$1,505,176	Active	10
Project P3	Developer P	10	20	Oregon				07/31/17	\$29,010,268	\$1,505,176	Active	10
Project P4	Developer P	6	20	Oregon				07/31/17	\$17,406,161	\$903,106	Active	6
Project P5	Developer P	8.25	20	Oregon				07/31/17	\$23,933,471	\$1,241,770	Active	8.25
Project P6	Developer P	7.15	20	Oregon				07/31/17	\$20,742,342	\$1,076,201	Active	7.15
Project P7	Developer P	10	20	Oregon				07/31/17	\$29,010,268	\$1,505,176	Active	10
Project P8	Developer P	3	20	Oregon				07/31/17	\$8,703,080	\$451,553	Active	3
Project P9	Developer P	3	20	Oregon				07/31/17	\$8,703,080	\$451,553	Active	3
Project P10	Developer P	10	20	Oregon				07/31/17	\$29,010,268	\$1,505,176	Active	10
Project P11	Developer P	10	20	Oregon				07/31/17	\$29,010,268	\$1,505,176	Active	10
Subtotal									\$224,539,474	\$13,988,577		93.4