

ORDER NO. 26-359

ENTERED Sep 30 2026

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2454

In the Matter of

IDAHO POWER COMPANY,

2025 Renewable Portfolio Standard
Compliance Report.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on September 29, 2026, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA8

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 29, 2026**

REGULAR _____ **CONSENT** X **EFFECTIVE DATE** _____ **N/A**

DATE: September 21, 2026

TO: Public Utility Commission

FROM: Alondra Regalado

THROUGH: Caroline Moore and Kim Herb **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2454)
2025 Renewable Portfolio Standard Compliance Report.

STAFF RECOMMENDATION:

Staff recommends the Public Utility Commission of Oregon (Commission) take the following actions, based upon Idaho Power Company's (IPC or Company) 2025 Renewable Portfolio Standard (RPS) Compliance Report:

1. Find that IPC complied with the RPS requirements for the 2025 compliance period.
2. Direct IPC to retire the renewable energy certificates (RECs) identified in its 2025 Compliance Report.
3. Direct IPC to provide a Western Renewable Energy Generation Information System (WREGIS) retirement report to the Commission, within 30 calendar days of the Commission's Order.

DISCUSSION:

Issue

Whether IPC's 2025 RPS Compliance Report meets the requirements of applicable RPS statutes and administrative rules.

Docket No. UM 2454
September 21, 2026
Page 2

Applicable Rule or Law

The RPS is codified at ORS 469A.005 through 469A.210. ORS 469A.170(1) and OAR 860-083-0350(1)(a) require that each electric company subject to Oregon's RPS provide an annual report demonstrating its compliance (or failure to comply) with the RPS standard.

ORS 469A.055 states that beginning in calendar year 2025, at least five percent of the electricity sold to retail electricity consumers in a calendar year by an electric utility must be qualifying electricity if the electric utility makes sales of electricity to retail electricity consumers in an amount that equals less than one and one-half percent of all electricity sold to retail electricity consumers. Under ORS 469A.055, Idaho Power is categorized as a small electric utility because its retail electricity sales equal less than three percent of all Oregon retail electric sales.

Among the reporting details required by ORS 469A.170(2)(a)-(h) and OAR 850-083-0350(2)(a)-(s), the Compliance Report must contain a complete accounting of RECs used for compliance in the compliance year, separating the RECs into bundled or unbundled, showing clearly which generating unit produced the RECs, the total cost of compliance, and a detailed explanation of any material deviations from the electric company's applicable acknowledged RPS implementation Plan filed either under OAR 860-083-0400, prior to January 1, 2024, or from January 1, 2024, and going forward, as part of the company's applicable acknowledged integrated resource plan.¹

ORS 469A.170(2) and OAR 860-083-0350(2) subsections (b)-(g) provide the Commission with the information necessary to determine whether an electric company may be considered in compliance with the RPS. These subsections require the electric company to provide a complete Compliance Report that shows the electric company has acquired and retired an appropriate number of valid RECs, bundled or unbundled, banked or unbanked, for the compliance year.

ORS 469A.100(1) provides that "[e]lectric utilities are not required to comply with a renewable portfolio standard during a compliance year to the extent that the incremental cost of compliance, the cost of unbundled renewable energy certificates and the cost of

¹ Under ORS 469A.075, an electric company had to develop and file a Renewable Portfolio Implementation Plan (RPIP) with the Commission at least once every two years. In 2023, the Oregon Legislature passed House Bill (HB) 3161, which amended ORS 469A.075 to eliminate the requirement for a separate RPIP and require a plan for meeting the requirements of the RPS to be included in the electric company's integrated resource plan (IRP). The separate two-year filing requirement for an RPIP was eliminated. HB 3161 went into effect on January 1, 2024.

Docket No. UM 2454
 September 21, 2026
 Page 3

alternative compliance payments under ORS 469A.180 exceeds four percent of the utility's annual revenue requirement for the compliance year."

Concerning Community Solar Projects, OAR 860-088-0150(1) provides that "[m]egawatt hours of electricity associated with participant ownership interests or subscriptions will be deducted from the amount of electricity sold by the electric company to retail electricity consumers for purposes of calculating the electric company's renewable portfolio standard under ORS 469A.052."

ORS 469A.145(3) allows utilities to exclude unbundled RECs from PURPA qualifying facilities from calculation of the 20 percent cap on the use of unbundled RECs established under ORS 469A.145(1).

Analysis

Background

The Company filed its 2025 RPS Compliance Report (Compliance Report or Report) on June 1, 2025, in compliance with OAR 860-083-0350(1)(a). The Company's Report demonstrated IPC's compliance with the RPS for the period of January 1, 2025 through December 31, 2025. No comments were filed in the docket.

Idaho Power's Compliance Report

Table 1 below summarizes IPC's 2025 RPS obligations and compliance activities.

Table 1: Idaho Power's 2025 RPS Compliance Report

RECs Obligation	Value
Oregon retail sales (MWh)	675,391
Community Solar Program Deduction (MWh)	0
RPS % Obligation	5%
RPS Obligation of Qualifying Electricity (RECs)	33,770
Summary	Value
RPS MWhs used for Compliance in Year	33,770
Two-for-one Solar MWh reported	0
Total RECs reported in Compliance Year	33,770
RECs used for RPS Compliance in 2025	Value
Bundled - newly acquired (RECs)	0
<i>Bundled - newly acquired (% RPS)</i>	<i>0.0%</i>
Bundled - from bank (RECs)	0

Docket No. UM 2454
September 21, 2026
Page 4

<i>Bundled - from bank (% RPS)</i>	<i>0.0%</i>
Bundled RECS subtotal	0
<i>Bundled RECS subtotal (% RPS)</i>	<i>0%</i>
Unbundled - newly acquired (RECs)	0
<i>Unbundled - newly acquired (%)</i>	<i>0.0%</i>
Unbundled - from bank (RECs)	33,770
<i>Unbundled - from bank (%)</i>	<i>100.0%</i>
Unbundled RECs subtotal	33,770
<i>Unbundled RECs subtotal (% RPS)</i>	<i>100%</i>
Total RECs	33,770

Renewable Energy Credit (REC) Obligation

This is the first year Idaho Power has been subject to Oregon's RPS statute. Idaho Power is defined as a Small Utility per ORS 469.055, and as such, its RPS compliance level is determined by the Company's percentage of retail sales in Oregon. Table 2 below summarizes RPS obligations based on retail sales for small electric utilities, starting in Year 2025.

Table 2: Small Electric Utilities

Sales of electricity as a percentage of all electricity sold to retail customers in Oregon	Less than or equal to 1 %	Greater than or equal to 1.5% but less than 3%
RPS obligation	5%	10%

Since August 2024, the Company has been in communication with Staff to determine its compliance obligation. Idaho Power identified misalignment between the timing in which retail sales data would be published for 2025 and the June 1, 2026 report deadline. The Company explained to Staff that the publication of 2025 FERC Form 1 and the publication of the 2025 Oregon Utility Statistics Book (which includes sales data for compliance calculations) happens after the RPS compliance report is due. Staff advised the Company to use the best available data sources and noted that should Idaho Power find that it is short on RECs and unable to procure appropriate RECs on time, the statutes and rules provide other compliance methods. OAR 860-083 0500 permits alternative compliance payments in the instance that there is a shortage in RECs to comply with the obligation.

The Company used the 2024 Utility Statistics report to calculate its total annual Oregon electric retail sales. As shown in the table below, Idaho Power's annual electric retail

Docket No. UM 2454
 September 21, 2026
 Page 5

sales accounted for 1.1 percent of all retail electric sales in the state of Oregon in 2024. Per ORS 469A.055(2), this results in the Company's RPS obligation requiring that five percent of the Company's electric sales to retail customers in 2025 be qualifying electricity. For compliance year 2025, IPC then applied its 5 percent obligation to its updated sales numbers from the 2025 FERC Form 1. Based on this, and as seen in Table 4 below, IPC's RPS obligation is 33,770 RECs or 5 percent of the difference between its total Oregon retail sales (675,391 MWh) and power generated by Oregon Community Solar Program (0 MWh).

Table 3: Total Oregon Sales Calculation

Year	Idaho Power MWh Sales (A)	Total Oregon MWh Sales (B)	Idaho Power Percent of Total Oregon MWh Sales $[(A) / (B)] \times 100$
2024	673,939	59,307,336	1.1%

Table 4: REC Obligation Calculation

Year	Idaho Power 2025 FERC Form 1 Oregon MWh Sales (A)	ORS 469A.055(2) Compliance Obligation (B)	Idaho Power Percent of Total Oregon MWh Sales $[(A) * (B)]$
2025	675,391	5%	33,770

IPC's 2025 RPS Compliance Report demonstrates compliance with its RPS obligation through its use of 33,770 unbundled, banked RECs. Of those 33,770 RECs, 100 percent are banked. Staff notes that small electric utilities are not subject to ORS 469A.145, which imposes a 20 percent cap on the use of unbundled RECs by large utilities.

Cost of Compliance and Revenue Requirement

For compliance year 2025, IPC's total cost of compliance is \$37,846. This is IPC's first-time reporting compliance, and thus there is no historical data with which to compare this cost. In its compliance report, Idaho Power did not report revenue requirement under OAR 860-083-0350(2)(n), stating that it believes that small electric utilities are not subject to revenue requirement rules in OAR 860-083-0350(2).

In September 2025, Staff explained to IPC that the OARs may not reflect specific requirements for small electric utilities. In July 2026, Staff further explained that IPC is not exempt from RPS compliance reporting rules in Division 83. OAR 856-038-0350(8) does not impact the RPS compliance filing requirements nor absolve small electric utilities of a revenue requirement calculation and associated limits on the cost of compliance in ORS 469A.100 and 860-083-0200. The applicable OAR provision only exempts small electric utilities from Division 83, "as provided by 469A.055." Review of

Docket No. UM 2454
 September 21, 2026
 Page 6

Division ORS 469A.055 shows that small electric utilities are exempt prior to 2025. Subsections (2) and (3) provide the obligation beginning in the 2025 calendar year. Thus, IPC is expected to comply with the reporting requirements outlined in ORS 469A.170 in this filing, and in future filings. Staff submitted a discovery request for the missing information.

The Company responded to Staff request on August 25, 2026. In information request (IR) No. 1, IPC reports that its revenue requirement amounts to \$62,194,561. Table 5 below shows the calculation to determine the cap on compliance costs as a percentage of revenue requirement (per ORS 469A.100).

Table 5: Revenue Requirement²

Renewable Energy Certificate ("REC") Vintage	Market Price (A)	Number of RECs Used for 2025 RPS Compliance (B)	Total Cost [(A)*(B)]
2020 and before	\$1.10	10,469	\$11,515.90
2021	\$1.13	23,299	\$26,327.87
2022	\$1.18	1	\$1.18
2023	\$1.45	1	\$1.45
Total		33,770	\$37,846.40

Table 6: Cost of Compliance as Percentage of Revenue Requirement

Total Cost of Compliance (A)	Revenue Requirement (B)	Cost of Compliance as Percentage of Revenue Requirement (A)/(B)*100
\$37,846	\$62,194,561	0.1%

Staff finds that the Company's Cost of Compliance as percentage of Revenue Requirement does not exceed the 4 percent cap.

Material Deviations

House Bill (HB) 3161 streamlined the renewable portfolio standard reporting practices by eliminating the statutory requirement that utilities file Renewable Portfolio Implementation Plans (RPIPs) every two years. Instead, HB 3161 modified ORS 469A.075 to require utilities describe the electric company's plan for meeting the requirements of the renewable portfolio standard as part of the electric company's IRP.

Idaho Power's 2025 IRP, acknowledged in Order No. 25-503, does not specify a plan for its RPS because at the time the IRP was developed, the Company did not have an

² Idaho Power provided this information in response to Staff IR No. 2.

Docket No. UM 2454
September 21, 2026
Page 7

RPS obligation. In response to Staff's information request No. 4, Idaho Power clarifies that there were no material deviations in compliance strategy described in 2025 IRP and the Company's 2025 RPS compliance report.

Staff confirms the Company did not have an RPS to report on in the 2025 IRP, but notes the Company will need to include a renewable plan in its next IRP.

Conclusion

Staff concludes that IPC has met the RPS compliance target mandated by ORS 469A.052(1)(b) and the RPS compliance reporting requirements mandated by OAR 860-083-0350.

PROPOSED COMMISSION MOTION:

1. Find IPC to be compliant with Oregon's Renewable Portfolio Standard during the 2025 period;
2. Direct IPC to retire the RECs identified in its 2025 Compliance Report; and
3. Direct IPC to provide a Western Renewable Energy Generation Information System retirement report to the Commission, subject to appropriate non-disclosure agreements, within 30 calendar days of the Commission's Order.

Idaho Power UM 2454