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Idaho Power Company Comments on the Regional RA Program Proposals and Summer/Fall Workshops

Idaho Power appreciates the continued efforts of the RA Sponsors, Work Group participants, and stakeholders in developing a Regional Resource Adequacy Program. Idaho Power continues to advocate for development of a voluntary program that establishes common resource adequacy standards, supports reliability, promotes transparency, and allows participants to leverage the benefits of regional diversity. As Idaho Power stated in its prior comments, critical to the success of the program are accountability, capacity adequacy, accreditation integrity, deliverability, voluntary participation, and a governance structure that ensures a voice to entities with compliance obligations. Idaho Power provides comments on specific areas below, and otherwise incorporates and reiterates its June 17, 2026 comments.

Background on Idaho Power

Idaho Power is a vertically-integrated investor-owned utility serving more than 660,000 retail customers in Southern Idaho and Eastern Oregon. Idaho Power actively participates in the Western Resource Adequacy Program, and supports regional RA efforts. While no final decision has been made, Idaho Power has indicated a preference toward participation in EDAM.

Idaho Power Company Comments

Governance and Participant Oversight

While many details remain to be worked out, Idaho Power generally supports the proposed governance framework and the continued development of the Technical Review Committee as the primary participant body to oversee technical and policy issues affecting resource adequacy requirements. Participants that voluntarily assume compliance obligations must retain a meaningful and direct role in policy development and ongoing program administration.

Capacity Accreditation and Reliability Modeling

The value of the program depends heavily upon confidence that accredited megawatts represent genuine reliability capability during stressed system conditions. Accreditation methodologies should be consistent across participants, based on sound analytical principles, transparent, verifiable, and periodically reviewed. Idaho Power generally supports the direction thus far on technical analysis topics.

Transmission Deliverability Must Remain a Foundational Requirement

Deliverability is not simply a compliance consideration. It is a core component of resource adequacy. A resource that is not delivered on firm transmission – i.e., has a greater risk of being interrupted or curtailed – cannot reasonably be expected to deliver during periods of system stress and does not provide the same reliability value as a resource supported by adequate transmission arrangements. The primary benefits of a regional program arise from the ability to leverage resource diversity across a broad geographic footprint, but those benefits only materialize if capacity can move from one area to another during reliability events. Idaho Power supports maintaining a substantial firm transmission requirement and believes firm transmission should remain the preferred demonstration standard.

Idaho Power is concerned that some elements of the transmission proposal could allow participants to meet forward showing requirements “in name only” and may not support actual deliverability and resource adequacy. For example, the proposal to allow firm or conditional firm transmission rights on different paths (i.e., not to a participant’s load) to qualify if they are “eligible” for redirect is concerning. It is unclear what “eligible” for redirect means – does it mean simply that a redirect request is allowed to be submitted under the OATT? If so, the fact that a redirect request can be submitted provides no indication of whether it can be granted. Or does it mean that capacity appears to actually be available on the requested new path such that the redirect request can be granted? Idaho Power would be opposed to a proposal to allow transmission rights on different paths – not serving an identified load – to be used as a demonstration of deliverability to that load. Further, Idaho Power would have concerns with any proposal that might allow nonfirm transmission to be used without demonstration of attempts to obtain firm transmission (for example, submission of a transmission service request that is in study status).

A number of other details remain to be worked out. Idaho Power is not necessarily opposed to the concept of constrained and secondary legs, or the exceptions related to availability of firm transmission, but participants should be incented to obtain firm transmission when it is available to achieve the goals of resource adequacy and to support reliability. Firm transmission availability can change quickly; while it may not be available in one time horizon or product duration, it may be available for other durations that would also meet the need.

Compliance Framework and Individual Accountability

Idaho Power generally supports the proposed program timeline and phases and supports a framework that balances long-term planning with operational accountability. Each participant should remain responsible for satisfying its own resource adequacy obligations. Participation in the program is voluntary, and obligations or costs should not be transferred from one participant to another because of another participant's procurement decisions or compliance deficiencies. Details remain unresolved regarding other aspects of accountability, incentives, and actions regarding noncompliance.

Capacity Transactions and Unspecified Products

Appropriate capacity accreditation for resources is a core component of an effective resource adequacy program. Idaho Power supports the proposal's direction on resource-specific contracts. Idaho Power remains concerned that reliance on unspecified capacity or energy products could weaken confidence in compliance demonstrations if sufficient verification standards are not established. These contracts play a critical role in utility operations but do not necessarily represent a binding commitment of capacity for resource adequacy purposes. Where contractual arrangements such as WSPP Schedule C transactions are used to support resource adequacy showings, safeguards are needed to prevent double counting and ensure that the underlying capacity is genuinely available to support the participant's obligation.

Transparency and Verification

Idaho Power supports the continued development of reporting, verification, and transparency requirements. Participants should be able to rely on clear compliance requirements and determinations, validation of transmission and resource demonstrations, and meaningful audit and verification processes.

Conclusion

As the program moves toward publication of the initial proposal, Idaho Power encourages continued focus on the following principles: capacity counted toward compliance should represent real and deliverable reliability value; transmission deliverability should remain foundational; participants should remain individually accountable; governance should reflect participant responsibility; capacity transactions should include safeguards against double counting; and compliance provisions should provide confidence that all participants are meeting comparable standards.