

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF AVISTA  
CORPORATION'S 2013 ELECTRIC  
INTEGRATED RESOURCE PLAN**

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**CASE NO. AVU-E-13-07**

**ACCEPTANCE OF FILING**

**ORDER NO. 32997**

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On August 29, 2013 Avista Corporation dba Avista Utilities ("Avista" or the "Company") filed its 2013 Electric Integrated Resource Plan ("IRP").<sup>1</sup> On September 10, 2013 the Commission issued a Notice of Filing and Notice of Modified Procedure allowing interested parties until November 13, 2013, to comment on the IRP. *See* Order No. 32888. The Commission Staff, Idaho Conservation League ("ICL"), Snake River Alliance ("SRA"), and Sierra Club and Montana Environmental Information Center ("SCMEIC")<sup>2</sup> filed written comments, and the Company filed a reply.

Having reviewed the record, including the IRP, the comments, and the reply, the Commission issues this Order accepting the Company's 2013 Electric IRP.

### BACKGROUND

An IRP is a utility's status report on its ongoing, changing plans to adequately and reliably serve its customers at the lowest system cost and least risk over the next 20 years. The report informs the Commission and the public about the utility's plans, and is similar to an accounting balance sheet; i.e., it is a "freeze frame" look at the utility's fluid, resource planning process. *See* Order No. 22299. The Commission requires the utility to: update the IRP at least biennially, allow the public to participate and comment during the IRP process, and implement the IRP. *See id.* and Order No. 25260.

The IRP should explain the utility's present load/resource position, its expected responses to possible future events, and the role of conservation therein. It should discuss "any flexibilities and analyses considered during comprehensive resource planning, such as: (1)

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<sup>1</sup> On December 23, 2013, Avista filed "Supplemental Updated Tables" to its IRP that added the 2027 83 megawatt ("MW") peaker that had been inadvertently omitted from IRP Tables 1, 8.2, and 8.15 as originally filed.

<sup>2</sup> The Sierra Club and Montana Environmental Information Center filed joint comments.

examination of load forecast uncertainties; (2) effects of known or potential changes to existing resources; (3) consideration of demand- and supply-side resource options; and (4) contingencies for upgrading, optioning and acquiring resources at optimum times (considering cost, availability, lead time, reliability, risk, etc.) as future events unfold.” *See* Order No. 22299. The IRP should separately address:

- (1) “Existing resource stack” by identifying all existing power supply resources;
- (2) “Load forecast” by discussing expected 20-year load growth scenarios for retail markets and for the federal wholesale market including “requirements” customers, firm sales, and economy (spot) sales. This section should be a short synopsis of the utility’s present load condition, expectations, and level of confidence; and
- (3) “Additional resource menu” by describing the utility’s plan for meeting all potential jurisdictional load over the 20-year planning period, with references to expected costs, reliability, and risks inherent in the range of credible future scenarios.

*Id.*

The IRP is not merely an academic or regulatory exercise but is intended to demonstrate to the Commission and the public that the Company has considered, and prepared for, a multitude of scenarios. The Commission expects each company submitting an IRP to vigorously test the assumptions used in its plan to better ensure that the results of its IRP accurately reflect changing markets and customer demand.

### **THE 2013 ELECTRIC IRP**

The 2013 Electric IRP guides Avista’s resource strategy over the next two years and directs resource procurements over the 20-year plan. It provides a snapshot of Avista’s resources and loads and guides future resource acquisitions over a range of expected and possible future conditions. Avista’s 2013 Electric IRP is about 210 pages long and is accompanied by 913 pages of appendices. The 2013 Electric IRP includes an Executive Summary plus the following sections: (1) Introduction and Stakeholder Involvement; (2) Loads & Resources; (3) Energy Efficiency; (4) Policy Considerations; (5) Transmission & Distribution; (6) Generation Resource Options; (7) Market Analysis; (8) Preferred Resource Strategy; and (9) Action Items.

Avista says its 2013 Preferred Resource Strategy (“PRS”) includes energy efficiency, upgrades at existing generation and distribution facilities, demand response (“DR”) and new gas-

fired generation. The PRS balances cost, reliability, rate volatility, and renewable resource requirements. The Company says its management and Technical Advisory Committee (“TAC”) guide the development of the PRS and the IRP by providing significant input on modeling and planning assumptions. TAC members include customers, Commission Staff, the Northwest Power and Conservation Council, consumer advocates, academics, utility peers, government agencies, and interested internal parties.

Avista says it uses a multiple-step approach to develop its PRS. The Company first identifies and quantifies potential new generation resources to serve projected electricity demand across the West. A Western Interconnect-wide study explains the impact of regional markets on the Northwest electricity marketplace. The Company then maps its resources to the present transmission grid configuration in a model simulating hourly operations for the Western Interconnect from 2014 to 2033. The model adds cost-effective new resources and transmission to meet projected loads. Monte Carlo-style analysis varies hydroelectric and wind generation, loads, forced outages and natural gas price data over 500 iterations of potential future market conditions. The simulation estimates Mid-Columbia electricity market prices by iteration, and the results collectively form the IRP Expected Case.

Avista’s 2013 IRP forecasts electricity price for the Expected Case, including the price range over the 500 Monte Carlo iterations. The Company forecasts the levelized average Mid-Columbia market price to be \$44.08 per megawatt hour (“MWh”) in nominal dollars over the next 20 years. The Company observes that electricity and natural gas prices are highly correlated because natural gas fuels marginal generation in the Northwest during most of the year. The Company reports that nominal levelized Expected Case natural gas prices at Stanfield trading hub, located in northeastern Oregon, and the forecast range from the 500 Monte Carlo iterations performed for the case result in an average \$5.40 per decatherm over the next 20 years.

Avista says the 2013 Electric IRP includes a 20-year Conservation Potential Assessment. The study analyzed over 4,300 energy efficiency equipment and measure options for residential, commercial, and industrial applications. Based on this data, Avista says its historical energy efficiency efforts decrease its energy requirements by 125 average MW (“aMW”), or about 10%. By 2033, energy efficiency reduces load by 164 aMW.

Avista says its management and the TAC guided the development of the 2013 PRS after carefully considering the information gathered and analyzed in the IRP process. The

resulting 2013 PRS meets future load growth with efficiency upgrades at existing generation and distribution facilities, conservation, wind, and natural gas-fired technologies. It also describes a reasonable low-cost plan along the efficient frontier of potential resource portfolios accounting for fuel supply risk and price risk. However, major changes from the 2011 PRS include reduced contributions from conservation, wind, and natural gas-fired resources. And for the first time, the Company's PRS includes a modest contribution from DR.

Avista says it then values each new resource and energy efficiency option against the Expected Case Mid-Columbia electricity market to identify its future value to the Company, as well as its inherent risk measured by year-to-year portfolio cost volatility. These values, and their associated capital and fixed operation and maintenance costs, are input into Avista's PRS Linear Programming Model ("PRiSM"). PRiSM then develops optimal mixes of new resources along an efficient frontier.

Avista says its PRS provides a "least reasonable cost" portfolio that minimizes future costs and risks given actual or expected environmental constraints. An efficient frontier helps determine the tradeoffs between risk and cost. Avista likens the approach to finding an optimal mix of risk and return in an investment portfolio. As expected returns increase, so do risks. Reducing risk reduces overall returns. There is a trade-off between power supply costs and power supply cost variability. Lower power cost variability comes from investments in more expensive, but less risky, resources. The PRS selection is the location on the efficient frontier where reduced risk justifies the increased cost.

Avista says the 2013 Electric IRP includes several scenarios that help identify tipping points where the PRS could change under alternative conditions to the Expected Case. It includes scenarios for load growth, capital costs, higher energy efficiency acquisitions, and greenhouse gas policies.

The Company says its 2013 PRS significantly differs from the 2011 IRP resource strategy. The Company says 2011 PRS resources included, on a nameplate capacity basis: 120 MW of Northwest Wind by the end of 2012 and 2019-2020; 83 MW of simple-cycle combustion turbine ("SCCT") by the end of 2018 and 2020, and 46 MW by 2029; 4 MW of existing thermal resource upgrades by the end of 2019; 270 MW of combined-cycle combustion turbine ("CCCT") by the end of 2023 and 2026. Further, 2011 PRS efficiency improvements included

28 MW of distribution efficiencies and 419 MW of energy efficiency from 2012-2031 on a peak reduction basis. In summary, the 2013 PRS compares to the 2011 PRS as follows:

<b>Year</b>	<b>2013 PRS</b>	<b>2011 PRS</b>
<b>2018</b>		83 MW SCCT
<b>2019</b>	83 MW SCCT	4 MW Thermal Upgrades
<b>2019/2020</b>		120 MW Northwest Wind
<b>2020</b>		83 MW SCCT
<b>2021</b>		
<b>2022</b>		
<b>2023</b>	83 MW SCCT	270 MW CCCT
<b>2024</b>		
<b>2025</b>		
<b>2026</b>	270 MW CCCT	270 MW CCCT
<b>2027</b>		
<b>2028</b>	6 MW Thermal Upgrade	
<b>2029</b>		46 MW SCCT
<b>2030</b>		
<b>2031</b>		
<b>2032</b>	50 MW SCCT	
<b>Distribution Efficiencies</b>	<1 MW peak reduction	28 MW peak reduction
<b>Energy Efficiency</b>	221 MW peak reduction	419 MW peak reduction
<b>Demand Response</b>	19 MW peak reduction	-

Avista says its renewable and capacity needs have changed since the 2011 plan. For example, the Company says it satisfied the 2012 Northwest Wind component of the 2011 PRS by adding Palouse Wind to its resource mix in December 2012. Also, changes in Washington law eliminated the need for a 2019/2020 wind resource. Further, while the 2011 IRP forecast 1.6% annual load growth, the 2013 IRP forecasts just over 1% growth. The Company says the lower expected load growth delays the first natural-gas-fired resource need by one year and eliminates the need for a CCCT in 2023.

Avista says that since 2007, its Expected Case has included forecasts of greenhouse gas emissions costs. However, the Company now believes a national greenhouse gas cap-and-trade system or tax will be unlikely given current legislative priorities and the President's Climate Action Plan. Thus, the Company's 2013 Expected Case does not include a market or tax solution to reduce emissions. Instead, because the states and the federal Environmental Protection Agency are implementing regulatory models limiting emissions for new facilities, and requiring current facilities to either implement best available control technologies or shut down,

the 2013 IRP forecasts significant numbers of plant retirements to meet these environmental rules. Avista projects greenhouse gas emissions from its existing and new generation resources will modestly increase, while Western Interconnect Greenhouse Gas emissions will fall from historic levels as less-cost-effective coal and older natural gas-fired plants retire. Avista explains that it does not follow this overall trajectory because the carbon intensity of its portfolio already is relatively low.

Avista says its 2013 Action Plan updates progress on the 2011 Action items and outlines activities Avista intends to perform for the 2015 IRP. Avista states the 2013 Action Plan includes input from Commission Staff, the Company's management team, and the TAC. Action item categories include resource additions and analysis, demand-side management, environmental policy, modeling and forecasting enhancements, and transmission planning.

### **THE COMMENTS**

Commission Staff, ICL, SRA and SCMEIC filed written comments in the case, and the Company filed a reply. The comments and reply are summarized below.

#### ***A. Commission Staff***

Staff says the 2013 Electric IRP complies with Commission Order Nos. 22299 and 25260. The Company amply provided for public participation and input through the TAC meetings. And the IRP sufficiently informs parties about the Company's present load position, how the Company would respond to different future events, and the role of energy conservation in the Company's plans. Staff thus recommended the Commission accept the IRP as filed.

Staff also recommended the Company consider the following when preparing the next IRP:

- The Company expects growth in net metering given state and federal incentives. Staff requests that the Company apprise Staff of net metering growth on the Company's system and of the Company's estimates of how net metering will affect load;
- Given the large decrease in energy and peak load growth rates between the 2011 and 2013 IRPs, Staff recommends that the Company closely monitor actual load growth in preparation for its 2015 IRP;
- The current IRP uses a 14% planning margin in addition to operating reserves. And it considers how increasing the planning margin from 14% to 20% would affect resource deficiencies (the first long-term year deficit would occur in 2016). However, it does not discuss whether using a 14%

planning margin on top of operating reserves is too high given the region's surplus. As the Company's IRP is used to set avoided cost rates in the Surrogate Avoided Resource model, Staff recommends that the next IRP further review the Company's planning margin for winter peak capacity planning;

- The Company relies on the CPA conducted by EnerNoc to set the IRP's energy efficiency targets. While Staff believes it is appropriate to use a CPA as a foundation for conservation, Staff requests that the Company and EnerNoc further explain their rationale for arriving at Achievable Potential savings.

See Staff Comments at 5, 7-9.

### ***B. ICL, SRA, and SCMEIC***

ICL, SRA, and SCMEIC filed comments expressing concerns about the 2013 IRP. In general, ICL says the Commission should accept the 2013 IRP but direct the Company to ensure its future IRPs fully address risks associated with Colstrip and accurately calculate the costs of alternative supplies. SCMEIC also says the IRP process should more fully address the Colstrip risks. SRA, on the other hand, says the Commission should withhold acceptance of any part of the 2013 IRP that envisions the indefinite operation of Colstrip until the Company details its expected costs to comply with known and anticipated environmental regulations impacting Colstrip.

In reply, the Company advocates that the Commission should accept the IRP because it complies with Commission Order Nos. 22299 and 25260. The Company also notes that while many stakeholders participated in the IRP process—the Company invited more than 120 representatives from 45 organizations to the Technical Advisory Committee meetings—ICL, SRA, and SCMEIC did not materially participate and expressed no concerns about the IRP until filing their comments.<sup>3</sup> That said, the Company points out that the IRP does consider the issues raised by ICL, SRA, and SCMEIC.

The commenters' concerns and the Company's reply are summarized below.

1. Colstrip Risks. SCMEIC, SRA, ICL say the IRP inadequately discloses and analyzes risks of continuing to operate Colstrip. These include:

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<sup>3</sup> The Company says ICL and SRA did not attend any of the six TAC meetings, and that SCMEIC listened in to one meeting via a conference bridge. Company Reply at 2.

*a. Regional Haze.* SCMEIC appealed the federal Environmental Protection Agency (“EPA”) regional haze decision for Colstrip. In summary, EPA decided that no upgrades need occur at Colstrip Units 3 and 4 while Units 1 and 2 must install Best Available Retrofit Technology (BART) pollution controls and reduce sulfur dioxide emissions to a level that SCMEIC deems unacceptably high. The commenters criticize the IRP for saying nothing about the appeal even though the appeal could cost Colstrip’s owners more than \$100 million if it succeeds. SCMEIC Comments at 4-5; ICL Comments at 2.

*b. Green House Gas Regulations.* SCMEIC says Colstrip will face unknown but significant costs when the EPA finalizes its greenhouse gas regulations, and that Avista should incorporate this risk by including a carbon price in future planning efforts. SCMEIC Comments at 5-6; *see also* ICL Comments at 2 (criticizing the Company for not using a carbon adder in its expected future case).

*c. Permitting for Prevention of Significant Deterioration.* The Clean Air Act requires that pollution sources like Colstrip obtain a permit before making any changes that could unnecessarily degrade air quality. SCMEIC says Colstrip was upgraded 12 times without permits. SCMEIC thus sued to enforce the permitting requirement. The comments believe the IRP should account for the risk that an enforcement order could require Colstrip to obtain permits and install air pollution control equipment. SCMEIC Comments at 6-7; ICL Comments at 2.

*d. National Ambient Air Quality Standards.* National Ambient Air Quality Standards generally impose emissions standards for ozone, lead, particulate, sulfur dioxide, nitrogen dioxide, and carbon monoxide. In 2010, EPA updated the sulfur dioxide standard. SCMEIC says Colstrip’s emissions likely do not comply with the new standard, which means that Colstrip now may have to meet lower emission limits than have already been imposed under the EPA’s BART determination (discussed above). The commenters say the IRP should account for these potential costs. SCMEIC Comments at 7-8.

*e. Mercury and Air Toxics Rule.* EPA’s Mercury and Air Toxics (“MATS”) rule establishes emission limits for mercury, non-mercury metals and acid gasses, and requires work practices to minimize the creation of dioxin and furans. Sources with the greatest potential compliance cost are those like Colstrip, which lack pollution equipment like baghouses and



modern sulfur dioxide controls. SCMEIC says it could cost \$76 million to install this equipment at Colstrip, and that the IRP should account for that risk. *Id.* at 8-9.

*f. Coal Combustion Waste.* SCMEIC says Colstrip has hundreds of acres of wet coal combustion waste surface impoundments that have leaked since the 1980s. SCMEIC says EPA is considering coal combustion waste regulations that would require groundwater monitoring, double lined landfills, closure of existing facilities, and possible conversion to dry ash disposal facilities. SCMEIC says Colstrip's total compliance costs will be unknown until the regulations are finalized. But Puget Sound Energy, which owns 1/3 of Colstrip, estimates it will cost \$42-125 million to comply with the regulations. In addition, the State of Montana has entered a consent order with Colstrip's owners to address certain coal ash disposal issues. SCMEIC and others believe the consent order is inadequate and have filed an enforcement action. If the action is successful, Colstrip could be required to upgrade its waste impoundments and clean up contaminated groundwater. The commenters say the IRP should account for these remediation risks. *Id.* at 9; *see also* ICL Comments at 1.

*g. Coal Costs and the Rosebud Mine.* SCMEIC notes that Colstrip obtains its coal from the adjacent Rosebud mine, which has the highest production costs for coal in the area. These costs are increasing, and the Company's current contracts related to Rosebud expire in 2019. SCMEIC says the Company is negotiating to extend these fuel supply contracts with Rosebud, and that the renegotiated contracts will likely reflect the increased costs of Rosebud coal. Rosebud also is the subject of an enforcement action that could further increase Colstrip's cost for coal. The IRP should include the risk that Colstrip's fuel costs will increase. *See* SCMEIC Comments at 9-11.

In reply, the Company notes that the 2013 IRP evaluates upgrading or retiring Colstrip under Expected and High Carbon pricing cases, and analyzes potential future liabilities for thermal generation, and specifically Colstrip. The IRP discusses Colstrip's environmental risks, Avista's climate change policy efforts, current and future environmental regulation, Western Interconnect carbon emissions, carbon and other environmental impacts on thermal generation and a Carbon Pricing case where the market is burdened by a carbon tax or similar program. The Company says its analyses show Colstrip continues to provide value to customers. Company Reply at 3. With regard to the ongoing SCMEIC lawsuit, the Company says the IRP is not a proper place to address this legal matter, but that it has fully disclosed the litigation to the

U.S. Securities and Exchange Commission. Further, the Company says it is too early to tell how the case will resolve and what portfolio and financial impacts it might have. *Id.* at 4.

2. Colstrip Replacement. The commenters say the Company uses the wrong measurement to analyze its costs of replacing the power from Colstrip. For example, SCMEIC and SRA note that the Company analyzes Colstrip's output based on nameplate capacity and then calculates what would be needed to replace that capacity. But to accurately measure the cost of Colstrip's power versus the cost of a portfolio without Colstrip, the Company should analyze Colstrip on a MWh basis, not a potential or nameplate basis. For example, Colstrip Unit 4 has experienced outages, but when Colstrip was operating reliably in 2011 the Company showed it as providing 162 aMW or 1,416,000 MWhs. Despite this, the Company's PRS says Colstrip would need to be replaced by a CCCT gas plant with a 270 MW nameplate capacity that provides 248 aMW. Further, Avista's share of Colstrip's nameplate capacity is only 222 MWs. The IRP should realistically plan for future resource needs by analyzing Colstrip's costs based on actual MWhs and not inflated nameplate capacity. SCMEIC Comments at 4; SRA Comments at 3.

In reply, the Company points out that if it was short only on energy it might make sense to consider Colstrip's retirement on an energy basis; but it is not short of energy. The IRP shows that the Company's needs are driven exclusively by capacity, and replacing Colstrip based on energy output would leave the Company short of those resources needed to maintain reliable service and would increase the cost to serve customers. Company Reply at 6.

ICL says the Company's analysis of the cost to replace Colstrip with a new 270 MW CCCT gas plant also is flawed because it does not consider whether the Company might replace Colstrip generation with existing, regionally available energy resources. ICL Comments at 3.

In reply, the Company says that relying on the wholesale marketplace for replacement power should only occur if analysis shows the wholesale power market has significant surpluses. But the Company and the Northwest Power and Conservation Council have determined that the wholesale power market will be deficient well before any retirement of Colstrip. Thus, Colstrip output in the IRP would not be replaced with market purchases. Company Reply at 5.

ICL also faults the Company's analysis of replacing Colstrip with the CCCT plant because the Company considers the cost to replace Colstrip but not the benefits of selling the Company's interest in Colstrip. ICL Comments at 3.

In reply, the Company says its Colstrip retirement scenario does not include any offsets from selling the plant at cost beyond reclamation. Further, there is no reliable information that would enable the Company to determine how selling its interest would impact the economics of Colstrip retirement. The Company has thus followed the Washington Utilities and Transportation Commission's direction to focus on removing Colstrip from its portfolio. The Company determined that removing Colstrip would cost customers tens of millions of dollars per year in replacement portfolio power supply expenses. Company Reply at 5.

3. Natural Gas Alternatives. SRA observes that IRP does not forecast energy or capacity deficits until around 2020, with the exception of sporadic winter peaking deficits that the Company will meet through market purchases. But the Company still plans to add four natural gas plants during the IRP horizon, through 2032. SRA says the Company is already very long on gas, and that the IRP will increasingly expose ratepayers to gas price volatility and uncertain supplies. Although Avista plans to start incorporating DR programs into its portfolio to possibly replace natural gas peaking units, the 19 MW of DR identified in the PRS is too low. The SRA says Avista's plan for 492 MW of natural gas plants and upgrades but only 19 MW of DR does not reflect a serious effort to reduce carbon emissions and that the Commission should direct the Company to further analyze its DR potential. SRA Comments at 3-4.

In reply, the Company notes that the 2013 IRP includes 19 MW of DR, and that this was the first time a DR program passed the least-cost test. Further, with some DR programs passing the cost-effectiveness test, Avista includes an action item in the IRP to study this resource further. Avista says that if this study supports maintaining or expanding the present DR level, the Company will pursue DR and discuss it in the 2015 IRP. Company Reply at 7.

ICL notes that the 2013 IRP identifies the potential to increase hydroelectric generation at Avista's existing facilities as an alternative to gas plants. ICL thus recommended the Company compare the costs and benefits of increasing hydro capacity against the preferred strategy of building new gas-fired peaker plants. ICL Comments at 3.

In reply, the Company notes the IRP specifically evaluated hydro upgrade options and found that the hydro upgrades were not least-cost and would not significantly reduce an overall portfolio risk. Company Reply at 7.

4. Net Metering. SRA questions why the Company says it may need to adjust rate structures if the 190 net metering customers identified in the IRP increases. SRA says that if the

Company believes the number of net metering customers is becoming a problem for its system, then the Commission should ask the Company why and what the Company believes an appropriate net metering penetration rate would be. SRA Comments at 5.

### **COMMISSION FINDINGS AND DECISION**

The Commission has jurisdiction over Avista, an electric utility, and the issues in this case under Title 61 of the Idaho Code and the Commission Rules of Procedure, IDAPA 31.01.01.000 *et seq.* The Commission has reviewed the filings in this case, including the 2013 Electric IRP, the comments, and the Company's reply. Based on that review, the Commission finds that the Company's 2013 Electric IRP contains the required information and is in the appropriate format as established in Commission Order Nos. 22299 and 25260. Accordingly, we find it reasonable to accept the Company's 2013 Electric IRP.

We appreciate the written comments submitted in this case. We encourage the commenters and other interested persons to participate in the IRP process and to provide further input to the Company as it develops its 2015 IRP. We expect the Company to consider and discuss at the TAC meetings the various concerns and suggestions that are and have been offered. In particular, we expect the Company to monitor federal developments, such as the promulgation of federal environmental regulations, and to account for their impact in its resource planning. We also encourage the Company to continue exploring the use of DR as a resource, and to be actively involved in and apprise us of matters relating to Colstrip. Lastly, given the decrease in load growth forecasts—a phenomenon that other utilities have reported—we encourage the Company to closely monitor actual load growth as it prepares its 2015 IRP.

As always, our acceptance of the Company's IRP should not be interpreted as an endorsement of any particular element of the plan or of any proposed resource acquisition contained in the plan. An IRP is a utility planning document that incorporates many assumptions and projections at a specific point in time. By accepting the Company's filing, we acknowledge only the Company's ongoing planning process, not the conclusions or results reached through that process.

### **ORDER**

IT IS HEREBY ORDERED that the Company's 2013 Electric IRP is accepted for filing.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. See *Idaho Code* § 61-626.

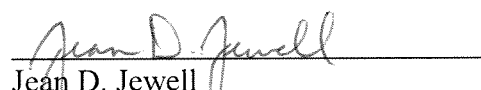
DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 20<sup>th</sup> day of March 2014.

  
PAUL KJELLANDER, PRESIDENT

  
MACK A. REDFORD, COMMISSIONER

  
MARSHA H. SMITH, COMMISSIONER

ATTEST:

  
Jean D. Jewell  
Commission Secretary

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