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IDAHO PUBLIC
UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FILING BY)
IDAHO POWER COMPANY OF ITS)
2004 ELECTRIC INTEGRATED)
RESOURCE PLAN (IRP))
_____)
CASE NO. IPC-E-04- 11
MOTION FOR EXTENSION OF
TIME TO FILE 2004 INTEGRATED
RESOURCE PLAN

In accordance with the provisions of Commission Order No. 22299 issued in Case No. U-1500-165, Idaho Power biennially files its Integrated Resource Plan ("IRP"). The IRP describes the Company's expectations for load growth and provides an overview of available resource options, including purchases of power from the wholesale market, the acquisition of additional generating resources and demand-side management programs. The Commission's Orders addressing the procedure to be followed in the IRP process require that the Company file the IRP by the end of June every other year.

In Order No. 29189 issued on February 11, 2003, in Case No. IPC-E-02-8, the Commission acknowledged and accepted Idaho Power's 2002 IRP. Order No. 29189 also described a number of changes that the Commission directed the Company to pursue in future IRPs. The Commission first directed the Company to modify the IRP development process so that the public could be involved in the development process in a more meaningful way. The Commission also directed the Company to modify its process to address not only supply options, but to undertake serious consideration and reasoned discussion of available demand-reduction options. In Order No. 29189 the Commission described its expectation that the Company consider the IRP to be an actual planning document. In that Order the Commission also expanded the IRP to accurately represent the Company's best estimate of future changes in loads, resources and contract obligations, and directed that the IRP be indicative of how the Company intends to meet its statutory obligations to serve native load.

In response to the Commission's direction contained in Order 29819, the Company has made a number of significant changes in the scope, allocation of resources and process it is using to develop the 2004 IRP. Probably the most visible change is the creation of the Integrated Resource Plan Advisory Council ("IRPAC"). The IRPAC consists of 16 different individuals representing various customer groups, environmental organizations, representatives of the Staffs of the Idaho Public Utilities Commission and the Oregon Public Utility Commission, members of the Idaho Legislature, the Governor's Office and others.

The IRPAC has held regular monthly meetings since September, 2003. Attendance (excluding Idaho Power employees) has averaged approximately 13 or 14

at each meeting. The meetings have essentially been all-day meetings and a substantial amount of information has been provided to and received from members of the IRPAC.

In addition to the expanded public involvement process, the Company has invested substantial additional resources in human resources and computer modeling capability and effort. This effort includes development of techniques to evaluate both supply-side and demand-side resources on an equivalent basis. Adjustments have also been proposed to model the role of renewable resources and the potential risks associated with CO² controls and other external costs associated with various types of generating resources.

While the Company has invested substantial additional time and effort in preparing the 2004 IRP, the increased scope and complexity has delayed development of the plan document.

At the most recent IRPAC meeting on April 15, 2004, the Company advised the IRPAC of its current schedule, including completion and distribution of the draft IRP, receipt of comments from the IRPAC on the draft IRP document, a series of four public meetings around the state and in Oregon to take public comment and then completion of the final 2004 IRP document to include both the comments received from the IRPAC and at the public meetings. The Company indicated to the IRPAC that while it is feasible for the Company to accomplish all of those goals prior to the scheduled end-of-June filing deadline, the Company was seeking advice from the IRPAC as to whether it would be preferable to seek a delay from the Commission of the filing date for the final 2004 IRP to allow the IRPAC additional time to review the draft IRP document

and to give the Company additional time to integrate comments from the IRPAC and the public meetings into the final IRP document.

After discussion, it was apparent to the Company that the participants in the April 15, 2004 IRPAC meeting (including representatives from the IPUC and OPUC Staffs) believed it would be better for the Company to spend additional time consulting with the IRPAC members and the public before it completed the 2004 IRP document, even if that meant asking the IPUC and OPUC for permission to file the 2004 IRP later than the scheduled end-of-June 2004 date.

Idaho Power is hereby requesting that the Commission allow the Company to file the 2004 IRP on or before August 31, 2004. Idaho Power will work diligently to file the 2004 IRP prior to that date, but the Company believes it would be in the public interest for the Commission to allow the Company this sixty-day extension in the filing date.

Based on the foregoing, the Company respectfully requests that the Commission, either by order or by minute entry, authorize the Company to file its 2004 IRP on or before August 31, 2004.

Respectfully submitted this 30th day of 2004.



BARTON L. KLINE
Attorney for Idaho Power Company