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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE INVESTIGATION)
CONCERNING ISSUES RELATED TO IDAHO) **CASE NO. IPC-E-04-23**
POWER COMPANY’S COST OF SERVICE)
STUDY.) **JOINT MOTION FOR**
) **EXTENSION OF TIME**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of Record, Donald L. Howell, II, Deputy Attorney General, and requests that the Commission grant a 60-day extension of time for the parties in this proceeding to file a report concerning Idaho Power Company’s cost of service.

BACKGROUND

In Idaho Power’s 2004 rate case, the Commission noted that several parties raised legitimate questions regarding components of Idaho Power’s cost of service. Order No. 29505 at 47. Consequently, the Commission initiated this proceeding to allow interested parties to examine several issues related to the Company’s cost of service study. The Commission directed that the interested parties submit a “final report” containing their recommendations “to the Commission no later than February 28, 2005.” *Id.* Pursuant to this directive, the Commission issued a Notice of Public Workshop in October 2004. Since this initial notice, the parties have conducted three workshops – the most recent on February 25, 2005.

Although the Staff believes that the workshops have produced more detail information and generally raised the level of knowledge about Idaho Power’s cost of service

MOTION FOR
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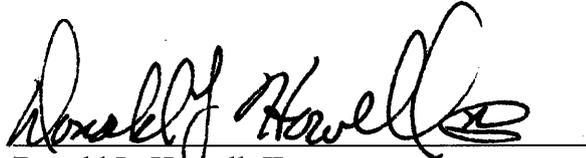
study, the parties are not yet in a position to assemble a final report. Consequently, the Commission Staff on behalf of all the parties request that the Commission postpone the date that the report is to be submitted.

At last week's workshop, the parties discussed the progress of this case and the likelihood of reaching consensus. The parties agreed that a draft report should be prepared and circulated among the parties. Consequently, the parties recommend that the Commission postpone the due date for the final report until April 29, 2005.

PRAYER

The Commission Staff on behalf of all the parties, respectfully request that the Commission postpone the due date of the final report until April 29, 2005.

Respectfully submitted this 28th day of February 2005.

A handwritten signature in black ink, appearing to read "Donald L. Howell, II", written over a horizontal line.

Donald L. Howell, II
Deputy Attorney General

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