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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Idaho Power Company

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. IPC-E-05-10
OF IDAHO POWER COMPANY FOR)	
AUTHORITY TO INCREASE ITS RATES)	REPLY COMMENTS OF IDAHO
AND CHARGES FOR ELECTRIC SERVICE)	POWER COMPANY
DUE TO THE INCLUSION OF THE BENNETT)	
MOUNTAIN PROJECT INVESTMENT IN)	
REVENUE REQUIREMENT.)	
_____)	

The Commission Secretary has provided Idaho Power with copies of the comments filed in this case. Based on the Company's review of those comments, Idaho Power believes that it is necessary to provide limited reply comments addressing the proposals contained in the comments of (1) the United States Department of Energy ("DOE") and (2) the Public Works Department of the City of Boise, Idaho ("City").

The Commission Should Not Expand the Scope of This Proceeding

Neither the DOE nor the City comment on the revenue requirement portion of this case, but instead propose that the Commission adopt rate designs that are different than the uniform percentage increase Idaho Power has proposed.

Without commenting on the merits or demerits of the proposals made by City and DOE, Idaho Power requests that the Commission not expand the scope of this proceeding to include rate design issues.

Idaho Power is requesting that the Commission issue its order allowing the rates associated with the addition of the Bennett Mountain Project to become effective on June 1, 2005. If the Commission decides to consider rate design issues at this point in the process, it will be impossible for the Company to include the Bennett Mountain investment in rates on June 1, 2005.

In the past, Idaho Power has on several occasions filed applications between general rate cases requesting authority to increase its rates by a uniform percentage by class to include a single new generating unit. In those prior applications, the Commission has accepted the Company's proposal that each class of customers rates be increased on a uniform percentage basis until the next general rate case when rate design can be addressed on a comprehensive basis.

It Is Not Necessary To Consider Rate Design In This Case

Idaho Power has publicly indicated that it intends to file a new general rate case using 2005 as a test year. As a result, the uniform percentage increase requested by the Company in this case will only be in place for a relatively short period of time before a comprehensive review of rate design takes place in a general rate case. A

comprehensive review of the Company's total rate design, including the addition of the Bennett Mountain Project as a peaking resource, will be considered in this general rate application.

Neither DOE nor City has requested that the Commission convene a hearing to address rate design issues.

For all of these reasons, the Company respectfully requests that the Commission accept the Company's proposal to increase rates on a uniform percentage by class and defer discussion of the rate design changes as proposed by DOE and City until the Company's next general rate case.

DATED at Boise, Idaho, this 12th day of May, 2005.



BARTON L. KLINE
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of May, 2005, I served a true and correct copy of the within and foregoing REPLY COMMENTS OF IDAHO POWER upon the following by the method indicated below and addressed as follows:

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