



IDAHO POWER COMPANY
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BARTON L. KLINE
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PUBLIC UTILITIES COMMISSION

June 19, 2006

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P. O. Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-06- 16
Idaho Power Company's Motion For
Extension of Time to File 2006
Integrated Resource Plan

Dear Ms. Jewell:

Please find enclosed for filing an original and seven (7) copies of Idaho Power's Motion For Extension of time to File its 2006 Integrated Resource Plan.

I would appreciate it if you would return a stamped copy of this transmittal letter to me in the self-addressed stamped envelope enclosed.

Very truly yours,

Barton L. Kline

BLK:jb
Enclosures

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PUBLIC UTILITIES COMMISSION

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FILING BY)	CASE NO. IPC-E-06- <u>16</u>
IDAHO POWER COMPANY OF ITS)	
2006 ELECTRIC INTEGRATED)	MOTION FOR EXTENSION OF
RESOURCE PLAN (IRP))	TIME TO FILE 2006 INTEGRATED
_____)	RESOURCE PLAN

COMES NOW Idaho Power Company ("Idaho Power" or the "Company") and hereby moves the Commission for an order authorizing a ninety (90) day extension of the time for filing its 2006 Integrated Resource Plan. This Motion is based on the following:

1. 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 establishing the procedure to

be followed in the IRP process require that the Company file the IRP by the end of June every other year. However, for the reasons described below, it will not be possible for the Company to meet the June 30, 2006 deadline and Idaho Power respectfully requests the Commission authorize the Company to file its 2006 IRP on or before September 29, 2006.

2. The principal reason for this request for an extension of time to file the 2006 IRP arises out of constraints placed upon the Company's ability to integrate transmission costs and transmission availability into its resource evaluation matrix. These constraints have been brought about by recent changes in the Federal Energy Regulatory Commission's Standards of Conduct ("FERC SOC" or "SOC").

3. In preparing previous IRPs, Idaho Power formed a team that utilized the expertise residing in various areas of the Company. Representatives from Power Supply, Delivery, Pricing and Regulatory Services, Finance and other business units and departments within the Company worked cooperatively to prepare and finalize the IRP.

At the outset of the 2006 IRP cycle, Idaho Power's review of recent FERC SOC orders indicated that the Company may not be able to obtain transmission costs and other transmission information directly from its Delivery business unit employees. The Company knew that if its understanding was correct, these constraints on the Company's ability to obtain transmission information would make it more difficult for Idaho Power to conduct the IRP process. With less information on transmission costs and capability, the evaluation of various resource portfolios becomes more difficult.

4. To see if there was a way to mitigate the effects of the new SOC constraints, Company officials traveled to Washington, D.C. and met directly with FERC Commissioners and FERC Staff. As a result of that meeting and further analysis of FERC's orders relating to the SOC, it was determined that the IRP planning process was a part of the Energy Affiliate function of the Company. Therefore, personnel involved with the IRP planning process could not directly interact with personnel from the transmission and delivery side of the Company as they had in developing the 2004 Integrated Resource Plan.

5. Eventually it was determined that the best way for the 2006 IRP to move forward was to retain an independent consulting firm to perform much of the transmission analysis for the IRP which would have otherwise been obtained from the Company's Delivery business unit. This resulted in a significant time delay in the IRP process, both for the hiring of the independent consultant and providing the consultant with time to become familiar with the status of the Company's existing transmission system. The same Company personnel that conduct much of the IRP analysis were also involved in the interaction with the transmission consulting firm.

6. Another event that impacted the Company's ability to expeditiously proceed with the IRP process came about when the Company hired a consulting firm to conduct a wind integration study. This study was necessitated by, in part, the abundance of wind generation proposals made by PURPA developers as well as the Company's Wind RFP. The Wind RFP was a direct result of the Company's 2004 IRP action plan. Again, many of the same Company personnel who perform the IRP analysis are also involved in working with the consultant preparing the wind integration

study. This created another temporary constraint on the Company's personnel resources.

7. In preparing the 2006 IRP, the Company has continued to work with its Integrated Resource Planning Advisory Committee ("IRPAC") as it did in preparing the 2004 IRP. The IRPAC is aware of the constraints faced by the Company in working through these transmission issues. The IRPAC is also aware of the important role transmission information plays in planning the Company's resource portfolios. The IRPAC has been sympathetic to the Company's efforts to work within FERC SOC compliance constraints and has been informed of the Company's request for an extension of the date for filing the 2006 IRP.

8. Idaho Power hereby requests that the Commission allow the Company to file the 2006 IRP on or before September 29, 2006. Idaho Power will work diligently to file the 2006 IRP prior to that date, but the Company believes it would be in the public interest for the Commission to allow the Company this ninety (90) day extension in the filing date.

9. Based on the foregoing, the Company respectfully requests that the Commission, either by Order or by minute entry, authorize the Company to file its 2006 IRP on or before September 29, 2006.

Respectfully submitted this 19th day of June, 2006.


BARTON L. KLINE
Attorney for Idaho Power Company