BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S 2006 INTEGRATED):	CASE NO. IPC-E-06-24
RESOURCE PLAN)	
)	ORDER NO. 30281
)	

On September 24, 2006, Idaho Power Company ("Idaho Power" or "Company") filed its 2006 Integrated Resource Plan (IRP). On October 18, 2006, the Company filed a revised plan that corrected certain typographical errors and revised certain exhibits. The Company's filing is pursuant to a biennial requirement established in Commission Order No. 22299, Case No. U-1500-165. The IRP describes the Company's growing customer base, load growth, supply-side resources, demand-side management and risk analyses. Additionally, the 160-page IRP document and related appendices contain information regarding available resource options, planning period forecasts, potential resource portfolios, a ten-year resource plan, and a near-term action plan.

On November 21, 2006, the Commission issued a Notice of Application and Modified Procedure and solicited comments on the IRP. Order No. 30185. Commission Staff, Industrial Customers of Idaho Power, Idaho Irrigation Pumpers Association, Exergy Development Group, and the NW Energy Coalition, along with members of the public, filed timely comments. The Company filed reply comments on February 9, 2007.

THE INTEGRATED RESOURCE PLAN

The IRP filing consists of five documents: the IRP, a Sales and Load Forecast, the Company's 2005 Demand-Side Management Annual Report, an Economic Forecast, and a Technical Appendix. Idaho Power worked with stakeholders for 12 months to develop the IRP. The Integrated Resource Plan Advisory Council consisted of members of the environmental community, major industrial customers, agricultural interests, an Idaho state legislator, Commission Staff, a representative from the Idaho Governor's Office, and others. The Company also conducted presentations open to the general public from November 13-16, 2006 in Boise, Pocatello, Twin Falls, and Ontario, Oregon.

According to the Plan Summary, the Company anticipates that its customer base will increase from approximately 455,000 to over 680,000 by the end of the planning period of 2025,

an increase of 11,000 to 12,000 new customers per year. The Company states that it used a conservative resource plan based upon a worse-than-median level of water. It used 70th percentile water conditions and 70th percentile average load for energy planning. In addition, for peak-hour capability planning, it used 90th percentile water conditions and 95th percentile peak-hour load.

The IRP states that it includes 1,300 MW (nameplate) of supply-side resource additions and DSM programs designed to reduce peak load by 187 MW and average load by 88 aMW. The Company's average load is expected to increase by 40 aMW, and summertime peak-hour loads are expected to increase by 80 MW per year through 2025.

The Company states that the 2006 IRP provides the Company's estimate of future loads and sets forth how the Company intends to serve the electrical requirements of its native load customers over the next 20 years. While the proposed resource portfolio represents current resource acquisition targets, the Company notes that the actual resource portfolio may differ from the quantities and types of resources outlined in the IRP depending on responses to the Company's Requests for Proposals, the business plans of any ownership partners, and the changing needs of Idaho Power's system.

Idaho Power conducted an analysis of possible transmission path upgrades. With the assistance of an outside consultant, the following were selected as the most viable transmission alternatives:

- McNary (Columbia River) to the Locust Substation (Boise) via Brownlee;
- Lolo (Lewiston area) to Oxbow;
- Bridger, Wyoming to the Boise Bench Substation via the Midpoint Substation;
- Garrison or Townsend, Montana to the Boise Bench Substation via the Midpoint Substation; and
- White Pine, Nevada to the Boise Bench Substation via the Midpoint Substation.

The IRP's preferred portfolio includes a 250 MW coal-fired resource addition in 2013 identified as "Wyoming Pulverized Coal." The Company does not know specifically where this addition will be located, but states that one of the Company's best near-term alternatives for expansion at an existing coal-fired resource is the addition of a fifth unit at the Jim Bridger plant.

COMMENTS

Comments were filed by 20 individuals, Citizens Protecting Resources, Industrial Customers of Idaho Power, Idaho Irrigation Pumpers Association, Exergy Development Group of Idaho LLC, NW Energy Coalition, and Staff. Idaho Power filed reply comments.

Public Comments

A majority of the comments submitted by members of the public concerned the sources of Idaho Power's proposed supply. Ten commenters stated that they are against the inclusion of nuclear power and coal plants in the Company's IRP, and most added their desire that the Company focus on alternative sources such as wind, solar, biomass and geothermal energy sources. One specifically voiced encouragement to the Company to more strongly consider windgenerated energy. Four additional commenters also voiced an opposition to Idaho Power's proposed use of nuclear power and concern for the risks involved with nuclear power plants to human and environmental health, and noted that the undetermined nature of the funding for the INL nuclear plant made it imprudent to include in the IRP. One other commenter expressed his support of Idaho Power's inclusion of nuclear power in the IRP.

Two commenters suggested more public participation in different parts of the process. One of these commenters stated that more demand-side conservation is necessary and asked the Commission to not accept the IRP and require the Company to revisit the IRP to include increased conservation and efficiency efforts. The other commenter suggested that the Commission conduct a survey of a statistically significant sample of Idaho residents regarding their opinions on a preferred mix of energy supply, along with education of these residents of the costs of such sources.

With regard to carbon dioxide sequestration efforts, one commenter opposed them while another was in favor of requiring sequestration to offset any coal-fired generation added to the Company's resource plan.

Citizens Protecting Resources

Citizens Protecting Resources (CPR), a group organized in response to the proposed siting of a large merchant coal-fired power plant near Jerome in 2006, expressed its opinion that the IRP did not include a strong DSM plan. It urged the Commission "to mandate, or at least strongly encourage, efficiency and DSM." CPR also noted its opinion that the IRP contained a

low emphasis on non-hydro renewable energy sources. It supported the purchase by the Company of green tags and believes that such costs should be recoverable.

Staff Comments

The Staff noted that the 2006 IRP is a continuing improvement over prior IRPs. It believes that the Company's conservative approach to water, load, and peak capacity planning is reasonable. It noted that some risk remains for strong reliance on regional markets to meet summer peaking needs, but that the risk is mitigated by the conservative planning criteria. Staff Comments at 3.

Staff also supported the Company's extension of its planning horizon from 10 to 20 years. This approach allows the Company to incorporate more capital intensive resources that require a long lead-time and facilitates the analysis of transmission planning, among other pertinent activities. *Id*.

- 1. <u>Load Growth Forecasts</u>. Staff commented that Idaho Power continues to plan for a high level of growth in load over the planning horizon. The expected growth rate of 1.9% is lower than recent IRPs, but still signifies a robust upward trend. Of the four main customer classes, the residential sector appears to be the catalyst for growing load. The growth rate for residential customers is predicted to be about 2% annually, resulting in a net increase of nearly 190,000 customers by 2025 for that class. Summer peak load growth is projected at 80 MW a year over the planning horizon, with residential and irrigation accounting for approximately 60% of summer peak demand. *Id.* at 4.
- 2. <u>Fuel Price Forecasts</u>. Staff commented that perhaps the most important assumption and input in the modeling run is the natural gas price forecast. In the last five years, Staff noted, many electric utilities have relied on gas-fired combustion turbines, with an increased total gas consumption for electric generation of 45% over the past decade. *Id.* at 4-5. At the same time, the nation has experienced substantial volatility in gas prices. Staff commented that the IRP appears to present and utilize an annual average gas price, and it believes that it would be more appropriate to use a summer pricing schedule that reflects the timing of the Company's fuel purchases. Staff commented that to the extent the Company used weighted summer prices in its IRP, it should describe the methodology used in the calculation. *Id.* at 5.

Likewise, Staff noted that the Company's forecast of coal prices continues to exhibit the same upward trend in forecasts from the previous IRPs. IRP, Technical App. D at 50. Coal

prices, including transportation costs, become a major factor in assessing potential portfolios, as the Company appears committed to adding coal-fired resources to the mix. *Id.* at 6.

<u>Idaho Power Reply Comments</u>: The Company noted that the Aurora model utilized in the analysis of each portfolio does include seasonalization factors, which may not be apparent from reading the figures and data. Idaho Power Reply Comments at 5.

- 3. <u>Transmission</u>. Staff noted that at the behest of the Commission, Idaho Power included transmission alternatives in its resource planning. Staff Comments at 6. It stated that it believes that given the Company's needs, availability of economic resources and the maturity of the Pacific Northwest markets, the Company's emphasis on transmission upgrade is properly focused. Staff commented that the selections presented regarding transmission appear to be reasonable, including 285 MW of transmission upgrades that provide access to the Mid-C market in the Pacific Northwest. *Id.* Sites for transmission east of Boise have not been specifically identified, but the Company included generic transmission upgrade costs. The Staff considered this to be reasonable as a proxy, noting that the Company would likely provide more specific cost estimates when a more fully developed plan to acquire resources east of Boise is presented. *Id.* at 7.
- 4. <u>Supply Side Resource Options</u>. Staff noted that the selected portfolio is a modified version of the preferred portfolio from the 2004 IRP. *Id.* According to Staff, the three most significant changes are the timing of the additional coal based resources, the inclusion of transmission upgrades, and the modification of geothermal resources. *Id.* The selected portfolio consists of the following:

250 MW Wind

150 MW Geothermal

150 MW Combined Heat & Power (CHP)

250 MW Coal

250 MW IGCC Coal

285 MW Transmission

250 MW Nuclear

187 MW DSM (Peak reduction)

Staff noted that Idaho Power has committed to adding more wind generation to its portfolio. A major factor toward the reduction in new wind acquisitions is the amount of PURPA wind projects the Company has added since the preparation of the 2004 IRP, when it had only 2.61 MW of wind-related contracts. Excluding any unforeseen additional PURPA contracts, the amount of

wind energy in its resource mix will move to 450 MW within six years. *Id.* Staff also noted that the 2006 preferred portfolio increases the amount of geothermal-powered generation by 50 MW over the 2004 plan to a total of 150 MW. *Id.*

In addition, Staff noted that the single 500 MW coal-fired generation resource from the 2004 preferred portfolio has been altered in the 2006 IRP to two 250 MW acquisitions dispersed over the planning horizon. *Id.* at 8. Staff commented that Avista and Idaho Power are jointly assessing the current state of coal-based generation technologies. *Id.* Preliminary results indicate that integrated gasification combined cycle (IGCC) technology may be viable, but the high initial capital expenditures and unproven technology involved may be barriers. *Id.*

Staff added that the other 250 MW of coal-fired generation is anticipated to be online in 2013. The Company has provided a number of potential scenarios for adding regional pulverized coal to its resource portfolio with the expectation that any generating unit will be located outside of the state. By breaking up its acquisition of coal based resources into units smaller than proposed in the 2004 IRP, the Company notes a reduction in its exposure to risk of equipment failure and better alignment with its expected load growth. IRP at 97. Staff observed that this reduces the immediate rate impact on the Company's customers as well. Staff Comments at 8.

Lastly, Staff noted that the remaining supply-side resources in Idaho Power's preferred portfolio include 150 MW of Combined Heat and Power (CHP) and a 250 MW power purchase agreement (PPA) with INL for nuclear power. *Id.* The inclusion of the nuclear resource is speculative at this time, but is not considered in the plan to be implemented until 2023 and it is assumed that this will be addressed in future IRPs. *Id.* at 9.

5. <u>DSM Measures</u>. Staff commented that the 2006 IRP sets more aggressive targets for DSM savings for the planning period than did the 2004 IRP. Staff noted that the 2006 IRP proposes two new DSM programs and refinement and expansion of an existing program that will potentially result in a nearly 88 aMW savings and a reduction in peak load of 187 MW in 2025, both in addition to its existing programs. *Id.* Most of the existing programs are projected to expand for at least the first few years of the planning period, according to the 2004 IRP. *Id.*

The Commission approved modifications to the Irrigation Peak Rewards Program that are intended to expand the program beyond the level of the 2006 program. See Order No. 30194. Staff noted, however, that there is no acknowledgement of the program or assumptions of

continued associated savings and reductions to be found in the 2006 IRP. If included, Staff believes the Company needs to be more explicit in how it is factored into the analysis; if not included, the Company should explain why. Staff Comments at 9-10.

Staff noted that a second example is the status of the Company's advanced meter reading (AMR) deployment. *Id.* In Order No. 30102, the Commission granted Idaho Power a one-year period to investigate the technical issues that plagued the AMR deployment in the Emmett area. Through meetings with Staff, the Company has reported that many of the technical issues have been addressed, although new issues have appeared. Failure to resolve these issues may have a deleterious effect on demand response programs that utilize AMR technology. Staff further noted that the Company is scheduled to submit an updated status report by May 1, 2007. *Id.*

Staff commented that DSM programs continue to be among the most cost-effective resources available to Idaho Power. *Id.* However, the Company projects its DSM energy savings for 2007 and 2008 at between 65% and 75% of its proportional share of the Northwest Power and Conservation Council's (NWPCC) estimate of total conservation potential. *Id.* While the 2006 IRP demonstrates a higher commitment to DSM efforts than in the past, Staff believes that the Company does not yet propose to pursue all cost-effective DSM opportunities and incorporate associated energy and peak demand savings into its determination of new supply-side resource needs. Staff conjectured that perhaps the Company's fixed cost adjustment proposal in Case No. IPC-E-04-15 and its DSM incentive proposal in Case No. IPC-E-06-32 will mitigate the Company's position that DSM programs will be selected to minimize negative impact on shareowners. *Id.* at 11.

<u>Idaho Power Reply Comments</u>: Idaho Power noted that the changes to the Irrigation Peak Rewards Program approved by the Commission on November 30, 2006 (Order No. 30194) will significantly change the estimated savings from the program. Idaho Power Reply Comments at 5. It does expect an increased savings, by approximately 3.9 MW per day, in 2007, but depending on how the peak time is distributed and how the time period is used, the estimated savings will still be close to 30 MW. *Id.* at 5-6.

6. <u>Risk Analysis</u>. Staff noted that Idaho Power selected four of the 12 potential portfolios for further risk analysis in determining the preferred portfolio, with risk measures falling into either quantitative or qualitative categories. Staff Comments at 11. The quantitative

analysis closely follows that of the 2004 IRP with two exceptions, the exclusion of risk analysis associated with the expiration of production tax credits for wind and the inclusion of a sensitivity analysis to variations in the streamflows of the Snake and Columbia River systems. Advancement in the modeling software facilitated simulating various streamflow sequences for the hydrologic variability analysis, which each portfolio analyzed under varying assumptions of load requirements, carbon taxes, etc. The resulting analysis was not used in the final risk adjustment due to the magnitude of the impact of varying hydrologic conditions. Staff found this to be reasonable and noted that the difference in variability between the highest and lowest cost portfolios are relatively small (\$404 million versus \$434 million, or less than 7% difference in variability). *Id*.

Staff noted that the Company expanded its qualitative risk section in the 2006 IRP. Staff noted that the selected preferred portfolio had the second highest cost of the finalists in terms of average total cost, yet the lowest in terms of resource cost (capital and operating costs, with market sales and purchases excluded). The preferred portfolio was the second lowest risk-adjusted total cost portfolio among finalists due to its relatively higher risk ranking. *Id.* at 12.

7. Near-term Action Plan. Staff noted that since 2001 Idaho Power has been in a period of acquiring supply-side resources after nearly two decades of relatively few additions to its generation resource mix. *Id.* The 2004 and 2006 IRPs have presented a need to meet future deficiencies in energy as well as peak loads. Given the long lead-time associated with thermal base load generation facilities and the projected persistent deficiencies in energy beginning in 2012, Staff believes it is imperative that the Company addresses these concerns. *Id.*

Staff noted that the Borah-West transmission upgrade is scheduled for completion before the Company's next IRP filing in 2008. By that time it is anticipated that the final commitments for the McNary-Boise transmission upgrade will have been made. This addition is expected to be complete around 2012. Besides the Borah-West project, the Company is in the final stages of the wind RFP for 100 MW scheduled to be online by the end of 2007, as well as finalizing the geothermal RFP for 50 MW, scheduled for an online date in 2009. Finally, the approved 170 MW expansion of the Danskin facility is anticipated to be online in 2008. These additions, along with changing conditions faced by Idaho Power regarding loads, fuel prices, and market conditions will invariably affect the Company's 2008 IRP. *Id.* at 13.

<u>Staff Recommendation</u>. The Staff recommended that the Commission accept and acknowledge the Company's 2006 IRP for filing.

Industrial Customers of Idaho Power Comments

The Industrial Customers of Idaho Power (ICIP) expressed concern about the Company's inclusion of the Evander Andrews natural gas-fired combustion turbine in the IRP. ICIP Comments at 2. ICIP voiced a concern that the 2006 IRP only assumed that the Evander Andrews plant would be built without further analysis as to whether it was still needed. *Id.* The ICIP urged the Commission "to require the Company, in future IRPs, to evaluate any resources under consideration in order to determine if they continue to be preferred options." *Id.* at 3.

ICIP also stated that the Company had committed, in the application for the Evander Andrews turbine noted above, to investigate the potential of using emergency backup generators throughout its service area as a way to meet peak demand and that the Company had not yet done so. *Id.* As the Company is currently in the middle of such an investigation and believes it will have its proposal for the use of such generators by June 1, 2007, ICIP believes that the Commission should direct the Company to include its findings in its 2006 IRP. *Id.*

In addition, ICIP commented that it does not believe the Company used its best load forecast. *Id.* at 4. It noted that the IRP states that the Company did not incorporate any specific assumptions regarding the Conservation Reserve Enhancement Program (CREP), in which substantial farmland is set aside and the irrigation pumps thereon are turned off. *Id.* at 4-5.

ICIP also noted its concern that the IRP focuses on transmission upgrades in the northwest and does not fully concern possible transmission access to markets east of its service territory. *Id.* at 5. It states that environmental concerns in the northwest may constrain transmission and that it expects that coal resources in the Powder River Basin will be a likely low-cost generation resource for the region. *Id.* at 6.

Lastly, ICIP urged the Commission to direct the Company to clarify how it accounts for rate design tools in forecasting the system load, or to direct it to supplement the 2006 IRP with the data. *Id.* at 7. The ICIP urged the Commission to not accept the 2006 IRP for filing and direct the Company to reconsider and supplement the IRP in accordance with the ICIP comments. *Id.* at 1.

<u>Idaho Power Reply Comments</u>: Idaho Power stated in reply that, taking into account the substantial modeling and analysis that must be done to create an IRP, certain parameters and

assumptions must be locked down at a certain point. Idaho Power Reply Comments at 2. It refuted ICIP's assertion that Idaho Power does not revisit the ongoing prudency of its decisions, and stressed that it is mindful of various factors that affect its system and IRP. *Id.* It continues to believe that the Evander Andrews facility was an appropriate choice. *Id.*

The Company noted that it makes every attempt to have the most current load forecast possible. *Id.* at 2-3. The forecast used for this IRP was completed on October 26, 2005, and using a later forecast to incorporate the May 2006 Idaho CREP would have meant redoing months of modeling and analysis. *Id.* at 3. The Company also stated that it is continuing its investigation into a "virtual peaking plant" and will have its proposal to the Commission by June 1, 2007. *Id.*

Idaho Irrigation Pumpers Association Comments

The Idaho Irrigation Pumpers Association (IIPA) commended the Company for producing a realistic IRP and for proposing a diverse resource base. IIPA Comments at 1. IIPA noted its support of the Company's conclusion that it must build load capacity to meet the state's growth. *Id.* at 2. It added that although the Company's general load is increasing, irrigation load is not increasing. *Id.* It urged the Company to continue its DSM efforts for irrigators along with other customer classes. *Id.* Lastly, it voiced its support of the Company's proposal to reduce its reliance on regional market purchases. *Id.* at 3.

Exergy Development Group Comments

Exergy Development Group of Idaho LLC ("Exergy") urged the Commission to not accept the 2006 IRP for filing. Exergy Comments at 1. Exergy believes that the IRP focuses too strongly on transmission upgrades to the Pacific Northwest, disregarding opportunities that would benefit the Company and its customers. *Id.* at 2. It notes that as the Pacific Northwest relies on hydropower, when the Pacific Northwest generation is abundant, it is also usually abundant on Idaho Power's system. *Id.* It also noted that fish and wildlife protections may constrain the hydropower-based systems and reduce the Pacific Northwest surplus of energy. *Id.* Exergy challenged the IRP's assertion that all off-market purchases will be from the Pacific Northwest as being too simplistic and ignoring resource development to the east and south. *Id.* at 3-4. It commented that coal plants from Montana, Wyoming and Utah may be future resources, as well as renewable energy projects in the Company's service territory. *Id.* at 4.

<u>Idaho Power Reply Comments</u>: Idaho Power stated that ICIP's and Exergy's conclusions that it focused on transmission to the Pacific Northwest to the exclusion of the south

and east are incorrect. *Id.* at 3-4. It noted that the preferred portfolio does include transmission upgrades to the east, including certain facilities that have been proposed but not finalized. If these facilities are not developed, the Company stated that it is unlikely it would proceed with the associated transmission upgrades. *Id.* at 4.

NW Energy Coalition Comments

The NW Energy Coalition ("Coalition") lauded the Company's increased DSM programs. Coalition Comments at 1. It also voiced a concern about the amount of thermal resources proposed. *Id.* at 2. It noted that it is not convinced that the proposed additional 500 MW of coal-generated energy is necessary or prudent, especially in light of "the modest amount of wind acquisition proposed...." *Id.* The Coalition believes that the anticipated risk with wind variability is overstated and that a more comprehensive evaluation of wind-generated energy would reduce this risk. *Id.* at 4. It further expressed its disappointment in the amount of non-wind renewable energy sources included in the plan. *Id.* at 4-5. It believes that this can be improved to create a more even ratio of non-renewable to renewable resources. *Id.* at 5.

The Coalition encouraged the Commission to continue to urge the Company to incorporate the additional DSM programs set forth in the 2006 IRP. *Id.* at 6. It suggested that the Company could be directed to require or provide incentive to its new customers to participate in the DSM programs. *Id.*

The Coalition stated its concern that the IRP does not include improvements to southern Idaho transmission. *Id.* It noted that additional wind energy coming online and possible plans to expand the Bridger plant may require additional transmission capability (even when the upgrades to the Borah-West transmission system are taken into account). *Id.* It disagreed with the Company's assertion that increasing transmission capability in southern Idaho may place an undue reliance on the Wyoming energy market. *Id.* at 7.

DISCUSSION

The Commission has reviewed Idaho Power's 2006 Integrated Resource Plan and the submitted comments. We find that the Company's IRP contains the necessary information and is in the appropriate format as directed by Order No. 22299. We further find that the submitted comments have been helpful and informative, and, therefore, find that public hearings are not necessary.

We thank all those who sent in their comments for participating in the IRP process and presenting their views and information to the Commission. We especially thank the members of the public and the Citizens Protecting Resources for providing their thoughts regarding this Plan.

We find that the 2006 IRP is an improvement upon prior filings, and appreciate the efforts of the Company in refining and improving its planning process. In addition, we are pleased to see more information in the Company's Plan about transmission needs. We expect future IRPs will continue to contain the Company's evaluation and analysis of possible transmission projects, costs and potential risks.

We are also pleased that the Company is expanding its DSM programs and increasing the amount of renewable energy sources in its portfolio. The Commission recently approved a fixed cost adjustment mechanism designed to provide the Company financial neutrality to deviations in sales, such as lost sales due to DSM efforts. See Case No. IPC-E-04-15. The goals of the fixed cost adjustment are to remove the inherent disincentive to investing in demand-side measures and facilitate the Company's efforts to expand its DSM offerings. We expect to see in the Company's next IRP filing an analysis of how this mechanism has affected the Company's ability to incorporate more DSM programs.

Lastly, we find that receiving IRPs from each of the companies within a narrower timeframe would improve the planning of energy needs of customers within the state. Therefore, we direct the Company to provide a brief report to the Commission with its suggestions for how the timing of its IRP filing or its planning process may be coordinated with the IRP filings and processes of Avista Corporation and PacifiCorp dba Rocky Mountain Power so as to provide the Commission with a more regional view of these issues.

ACCEPTANCE OF FILING

Based on our review, we accept for filing the Company's filed 2006 Integrated Resource Plan. Our acceptance of the 2006 IRP should not be interpreted as an endorsement of any particular element of the plan, nor does it constitute approval of any resource acquisition or proposed action contained in the plan.

ORDER

IT IS HEREBY ORDERED that Idaho Power Company's 2006 Integrated Resource Plan is accepted for filing. Acceptance of the 2006 IRP should not be interpreted as an

endorsement of any particular element of the plan, nor does it constitute approval of any resource acquisition or proposed action contained in the plan.

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 with regard to any matter decided in 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 24^{th} day of March 2007.

PAUL KJELLANDÉR, PRESIDENT

MARSHA H. SMITH, COMMISSIONER

MACK A. REDFORD, COMMISSIONER

ATTEST:

Jean D. Jewell // Commission Secretary

O:IPC-E-06-24_cg2