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LISA D. NORDSTROM
Senior Counsel

July 29, 2009

VIA HAND DELIVERY

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-08-22
Rule H

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of Idaho Power Company's Answer to Petitions for Reconsideration in the above matter.

Very truly yours,

Lisa D. Nordstrom

Lisa D. Nordstrom

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Enclosures

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AUTHORITY TO MODIFY ITS RULE H LINE EXTENSION TARIFF RELATED TO NEW SERVICE ATTACHMENTS AND DISTRIBUTUTION LINE INSTALLATIONS.	CASE NO. IPC-E-08-22 IDAHO POWER COMPANY'S ANSWER TO PETITIONS FOR RECONSIDERATION

Idaho Power Company ("Idaho Power" or the "Company"), in accordance with Idaho Code § 61-626 and Procedural Rule 331, hereby responds to the Petitions filed by the Building Contractors Association of Southwestern Idaho ("Building Contractors"), the Ada County Highway District ("ACHD"), the City of Nampa ("Nampa"), and the Association of Canyon County Highway Districts ("ACCHD") for Reconsideration of Commission Order No. 30853 issued on July 1, 2009.

This case presents two distinct sets of issues on reconsideration: (1) the charges and credits governing New Service Attachments and Distribution Line Installations or Alterations raised by the Building Contractors and (2) relocations in

public road rights-of-way raised by ACHD, Nampa, and ACCHD (collectively referred to as the "Agencies"). The arguments raised on reconsideration are not new; Idaho Power Company previously addressed them in its Reply Comments filed May 1, 2009. The Company requests that the Commission deny the Petitions for Reconsideration filed in this case and supplements its arguments as follows:

I. BUILDING CONTRACTORS' PETITION

On October 30, 2008, Idaho Power Company proposed modifications to Rule H charges and credits that help reduce the upward pressure on rates by shifting more of the cost of new service attachments and distribution line installations or alterations from system revenue requirement to new customers and/or developers that request construction. The findings in Commission Order No. 30853 support this approach and the Company is working assiduously to implement all approved modifications by the November 1, 2009, effective date.

In responding to the Building Contractors' Petition for Reconsideration and/or in the Alternative for Clarification and Petition of Stay, the Company feels it necessary to differentiate a residential customer (a customer paying for electric service) from a developer (a business that does not take electric service). In many instances throughout their Petition, the Building Contractors refer to a "customer" when the actual reference is to a developer of a subdivision. For example, the heading at the top of page 6 of Building Contractors' Petition refers to "Developer (customer) Investment per lot." This can lead to confusion insofar as the Petition blurs the distinction to reach the erroneous conclusion that the Order creates "inherently discriminatory rate structure for line extensions." Building Contractors' Petition at 1-2.

A. Terminal Facilities and Line Installation Allowances.

Company-funded allowances are intended to provide a limit on the Company investment in distribution terminal facilities and/or line installations for customers or developers requesting service under Rule H. The fixed allowances are based on the most commonly installed overhead terminal facilities and help mitigate intra-class and cross-class subsidies by requiring customers (those connecting load) with greater facilities requirements to pay a larger portion (the amount above the allowance) of the cost to serve them. Allowance levels will be updated annually by the Company and will typically grow with inflation as approved by the Commission per Order No. 30853.

Regardless of whether construction is inside or outside of a subdivided development, the Company will provide customers and developers a fixed allowance equal to the Company investment toward their required terminal facilities. Customers are eligible to receive maximum allowances up to $1,780 for single-phase services and $3,803 for three-phase services per service attachment, whereas developers of subdivisions (with no connected load) are eligible to receive the same amounts for each transformer installed within a development. In no instance will allowances exceed the cost of the facilities provided.

For residential customers connecting load, the allowance generally covers the full cost the service connection resulting in no cost to the customer. The only cost difference to customers is that those inside residential subdivisions pay an underground wire installation charge equal to the differential between overhead service and underground service. Customers requesting underground service attachments outside of subdivisions are also required to pay the appropriate underground wire installation

charge. In both cases, most customers receive the equivalent of overhead service attachments without any personal investment because the allowance (credit) provided by the Company (investment) covers the entire cost of the required service. Customers requesting services beyond the "standard" or most commonly installed facilities are required to pay all costs above the provided allowance. As a result, customers are treated and charged equitably based on a standard overhead service.

1. Building Contractors Incorrectly Characterize Allowance Amounts.

Contrary to the Building Contractors' claims, customers outside of subdivisions are not eligible to receive a greater allowance than those inside subdivisions. Instead, *all* customers receive allowances for line installations and service connections up to the equivalent of the cost of standard overhead terminal facilities only – regardless of whether the connection is inside or outside a subdivision.

Developers of subdivisions (businesses that do not take electric service) on the other hand, receive Company-funded allowances of $1,780 for each single-phase transformer installed within a development and $3,803 for each three-phase transformer installed within a development to help offset their development costs. Here, developers are paying for and installing a portion of potential future customers' terminal facilities above the Company's investment as part of a business venture; they are not customers of Idaho Power. These allowances (Company investment) are credited directly to developers as a reduced cost that may or may not be passed on to home buyers (future rate paying customers).

The Company's required investment in terminal facilities has, and always will, vary between service connections within the same customer class. Staff's Comments

show that Staff recognizes that wide variation between customers exists within the residential class. Rather than "precisely matching the recommended allowance with the average embedded investment for the class, good judgment and simplicity support an allowance of terminal facilities." Staff Comments at 3-4. Recognition of this is demonstrated in the level of allowances currently provided under Rule H. For some customer classes, the Company is required to pay an "open-ended" level of allowance equal to overhead terminal facilities requirements without regard to the size and type of terminal facilities required. This results in customers (within the same customer class) receiving varying levels of Company investment. As shown in Section 3 of the existing Rule H, some allowances are based on a fixed or flat amount and some are based on an "open-ended" amount equaling the total cost or a percentage of the total cost of overhead terminal facilities. The allowances approved in Order No. 30853 do not depart from existing policy nor do they have a discriminatory effect on customers because similarly situated customers are treated the same under the tariff.

2. <u>Building Contractors Misread Staff's Comments</u>.

Contrary to the Building Contractors' assertion, it is apparent from Staff calculations throughout its Comments that Staff did not "mistakenly categorize a $1,780 "per transformer" allowance as a "per new customer" allowance. See Staff Comments, Attachment 9, page 2 of 4. Nor did the Commission misapprehend approved allowances as "per customer" rather than "per installed transformer" as is suggested by the Building Contractors on page 8 of its Petition. On page 10 of Order No. 30853, the Commission clearly states that "developers of subdivisions and multiple occupancy projects will receive a $1,780 allowance for each single-phase transformer installed

within a development and a $3,803 allowance for each three-phase transformer installed within a development." The Building Contractors confuse the facts by suggesting that developers are equivalent to "customers" and including developer-related costs in the calculations of customer charges and credits provided under Rule H. Again, developers may or may not reduce lot prices to reflect credits they receive from Idaho Power.

3. Line Extension Cost Recovery Does Not Create "Windfall."

The Building Contractors' Petition also suggests that if the current economic climate continues for any extended period, a "windfall to the Company and its existing customers" will result with "an additional unreimbursed line extension cost to developers." Building Contractors' Petition at 2 and 6. This is simply not true. The Company either makes an investment or it does not; if made, the Company expects to earn a return only on the investment it makes and does not receive a "windfall." At no time would the Company "recover costs exceeding the actual new distribution facilities cost." *Id.* at 7 (emphasis in original). Idaho Power does not earn a return on these Contributions In Aid of Construction ("CIAC"). CIAC reduces rate base growth. A larger payment by a customer or developer will not create a "windfall" to existing customers because increased CIACs reduce the responsibility of existing customers to pay for facilities that do not serve them.

In the event the Commission does not grant reconsideration, the Building Contractors' Petition requests that the Commission clarify its Order to "clearly confirm that the Commission now is rejecting its heretofore, longstanding policy that new customers are entitled to a Company level of investment equal to that made to serve

existing customers in the same class . . . ." *Id.* at 2 and 11. No such "confirmation" is needed nor would it be accurate. The Building Contractors' reference paraphrases a 1997 Commission finding in Order No. 26780, the Commission's last order addressing Rule H in its entirety. To the extent that Order No. 30853 requires a new customer payment greater than that made to serve existing customers, it is a reflection that different circumstances exist in 2009 than did in 1997. While Idaho Power is not convinced that one order can support the inference of a "longstanding" policy when the Commission has not revisited the policy in the interim, the fact remains that policy does not exist in a vacuum. Commission policies can (and do) change as conditions change. New customer-provided payments are essentially the "entry fee" to become a customer; that policy has not changed and it has no relationship to existing or past customers. The amount of the entry fee is different now than it was 12 years ago and correctly reflects the increased payment in distribution facilities necessary in 2009 to serve new customers.

The Building Contractors request the Commission confirm that it "recognizes and intends the disparity in Company investment (and customer charges) as between existing and new customers and as among new customers inside and outside of subdivisions created by the Order." *Id.* Again, no such confirmation is required or appropriate. It is true that under Order No. 30853, Idaho Power would invest less in terminal facilities than it has in the past. This is representative of the times Idaho Power finds itself in. The Company makes many investments for new customers for the numerous parts of its system that comprise its electric service. The fact is that Idaho Power's investment per customer is increasing. There are two principal drivers that

effect growth in rates over time: (1) inflation and (2) growth-related costs. The growth in rates over the past five years (over 21 percent) has outpaced pure inflation, demonstrating that growth is not paying for itself. Other than Rule H, no means of assessing the costs of serving new customers directly to those specific customers currently exists.

The *Homebuilders'* Court recognized that costs incurred to serve a specific customer or group of customers, such as line extension costs, may be recovered from those customers. The Court held:

> The instant case presents no factors such as when a nonrecurring charge is imposed upon new customers because the service they require demands an <u>extension of existing distribution</u> or communication <u>lines</u> and a charge is imposed to offset the cost of the utility's capital investment.

Idaho State Homebuilders v. Washington Water Power, 107 Idaho 415 at 421, 690 P.2d 530 (1984)(emphasis added). Consequently, the Commission does not need to justify "the disparity in new customer Company investment" based upon the factors enumerated in *Homebuilders* (e.g., cost of service, quantity of electricity used, differences in conditions of service or the time, nature or pattern of use) as suggested on page 9 of the Building Contractors' Petition. Utilities are permitted to recover line extension charges that will offset the actual per-customer cost of physically connecting to Idaho Power's distribution system. In light of the Company's increased investments to serve new customers on its system as a whole that will be paid for by the entire rate paying public, it is reasonable and prudent for the Commission to require that these connection costs be fully funded by the individual customers causing them.

B. Lot Refunds.

Under existing Rule H provisions, developers of subdivisions must pay full work order costs minus Company-funded allowances before the start of construction. In turn, developers are eligible to receive Company-funded lot refunds for five years as customers connect for permanent service within subdivisions. Lot refunds are generally paid directly to developers and may or may not be passed on to retail customers as they purchase new homes. Lot refunds are not guaranteed.

The "Comparison of Existing Rule H with Company and Staff Proposals" table found on pages 5 and 6 of the Building Contractors' Petition mischaracterizes customer costs by lumping developer investment and allowances with Building Contractors' alleged embedded costs per customer. Not only does this table misrepresent "new customer investment," it also contains flawed calculations of the total distribution rate (embedded costs) per customer as described by the Company's Reply Comments (pages 5-6) and referenced in Order No. 30853 (page 8). Simply put, the recently approved allowance levels and refund provisions provided to developers of subdivisions will not "raise new customers' investment in distribution" and will in no way result in the Company over-collecting line installation costs from "new customers" (actually developers) as alleged on page 6 of the Building Contractors' Petition. The elimination of lot refunds will reduce the Company's rate base because it will no longer grow by refunded amounts. In fact, customers as well as developers will benefit because this will hold electric rates down in the long run.

C. Vested Interest Refund Period.

The current five-year vested interest refund period has been in place for more than 20 years. Although economic conditions have varied over time, the five-year refund period has remained the same. In its 1997 Order addressing vested interests, the Commission found a five-year refund period "is reasonable and should be maintained" because it "balance[s] the competing objectives of fairness and administrative complexity." Order No. 26780 at 16-17. In that case, the Commission made a special exception for platted, undeveloped subdivisions and ordered a 10-year refund period. *Id.* at 17. The Building Contractors' claim that the all refund periods, even those in developed subdivisions, should be increased to 10 years is neither justified nor supported by substantial evidence.

D. Tariff Comparison

Contrary to the arguments of the Building Contractors, Commission's Order No. 30853 does not change long-standing policy relating to the manner in which the Company applies charges and credits for distributions line installations and new service attachments. The following chart compares the existing Rule H tariff for residential subdivisions to that approved in Order No. 30853.

	Existing Rule H Order No. 26780	**Approved Rule H** Order No. 30853
Charges and Credits to *Developers* of Subdivisions		
Allowances	Equivalent of terminal facilities	Equivalent of standard overhead terminal facilities (up to $1,780) per installed transformer
Refunds (not guaranteed)	$800 per lot	Not applicable
Difference in costs to developers	Work order costs minus allowances. (eligible for lot refunds for 5 years)	Work order costs minus allowances. (not eligible for lot refunds)
Charges and Credits to *Residential Customers*		
Allowances	Equivalent of overhead terminal facilities + $1,000 (non-electric heat) or $1,300 (all electric heat)	Equivalent of standard overhead terminal facilities ($1,780)
Refunds	Not applicable	Not applicable
Difference in cost to customers	Must pay overhead / underground differential for underground services	Must pay overhead / underground differential for underground services

The simplicity of the above table clearly demonstrates that the Commission's Order No. 30853 does not change long-standing policy relating to the manner in which the Company applies charges and credits for distribution line installations and new service attachments. In reality, only the monetary levels of charges and credits are updated to reflect current conditions. The method in which they are applied to developers and customers has not changed and the Company still funds a portion of distribution investment. Furthermore, Order No. 30853 treats existing and new

customers similarly. Much like a general rate increase, Rule H tariff changes will affect customers equally going forward.

E. Procedure on Reconsideration.

Idaho Power objects to the Building Contractors' request that the Commission "provide for an evidentiary hearing at which the parties' witnesses may be examined and/or cross-examined on their pre-filed testimony and all matters within the scope of the same . . . ." Building Contractors' Petition at 10. The issues the Building Contractors plan to address at hearing would seek to "establish an appropriate value of current Company embedded costs for distribution facilities, a method to true-up those costs over time, and a fair method for line extension costs, allowances, and refunds to be paid going forward." *Id.* All of these issues have previously been addressed by the parties in written comments. The Building Contractors' Petition does not indicate what evidence it would present at hearing that is different than what has been offered by the parties to date, other than just to cross-examine other parties' witnesses on their positions.

A hearing to address the full scope of its issues, as requested by the Building Contractors, would be extremely unfair to Idaho Power and the other parties in this proceeding. It is the equivalent of "starting over" procedurally nine months after the Company filed its Application. *The Building Contractors have had multiple opportunities to request a hearing and declined to do so prior to the issuance of Commission Order No. 30853.* The time to request a full hearing of the Company's Application was at the pre-Hearing conference on January 14, 2009, or even in one of its two sets of comments filed on April 17, 2009, and May 1, 2009, if it determined that written

comments were inadequate to address the issues raised in the Application. If the Commission finds it needs additional evidence to augment the record in this case, Idaho Power respectfully requests that it does so though written comments targeted to elicit the information sought by the Commission.

The Building Contractors also request "a stay of the effective date of those portions of the Company's Rule H tariff relating to the calculation and payment of allowances and refunds, including vested interest refunds, pending a final decision on the merits." *Id.* at 12. At the Company's request and per Order No. 30853, the charges and credits authorized by the Order will become effective for services rendered on or after November 1, 2009. According to the procedure set forth in Idaho Code § 61-626, the Commission may take 13 weeks to process reconsideration petitions after they are filed, and 28 days to issue its order after the matter is fully submitted. If the Commission grants reconsideration and uses the full statutory reconsideration period, the Commission will issue an order no later than November 18, 2009. The Company would note that a stay may not be necessary unless those additional 18 days are required to process the Petitions. Absent an Order to the contrary, Idaho Power will continue to plan for implementation of the credits and charges approved in Order No. 30853 on the November 1, 2009, effective date.

II. AGENCIES' PETITIONS

The Agencies' Petitions for Reconsideration/Clarification largely restate their previous objections to Rule H's Section 10. Their Petitions primarily focus on: (1) whether the Commission has jurisdiction over utility facility relocation amounts assessed to Idaho Power by public road agencies and (2) the application of Section 10 to third-

party beneficiaries and local improvement districts. For purposes of this Answer and the proposed Section 10, a "public road agency" is any state or local agency, county, or municipality that administers the public road rights-of-way and is requesting Idaho Power to relocate facilities.

A. Commission Jurisdiction

It is evident from their Petitions that the Agencies continue to misunderstand the distinction in jurisdiction between public road agencies and the Commission. Order No. 30853 acknowledges that the Agencies have authority to require Idaho Power to relocate its facilities in public road rights-of-way, at no cost to the public road agency, where the facilities would incommode the public use. Order No. 30853 at 12. Section 10 does not encroach on the Agencies' authority to determine that relocation of utility faculties is necessary. However, the Agencies' authority to require relocation does not give them sole discretion to decide if the utility will receive any subsequent reimbursement from third parties benefitting from the facilities relocation.

The question of who pays for the costs of relocating utility facilities directly bears on utility rates and charges and, as a result, fall squarely within the jurisdiction of the Commission. The Commission has authority under Idaho Code §§ 61-502 and -503 to regulate how utilities will recover the costs of relocating their facilities in their rates and charges. This authority includes the ability to require the beneficiary of a relocation of utility facilities to contribute the cost of relocation funded by the utility. Such contributions benefit the rate paying public by reducing upward pressure on rates.

The Commission is obligated to protect the public interest and is charged with ensuring that costs of utility facility relocation have not been unreasonably charged to

Idaho Power customers when, in fact, the relocation of futility facilities wholly or partially benefits a person or entity other than the public. If costs are being unreasonably allocated, the Commission has the authority to provide a remedy. It is reasonable and prudent that the Commission should approve rules that require the third-party causing facility relocation to reimburse Idaho Power so that the costs of the relocation are not unfairly shifted to the Company's customers.

There is nothing in Idaho Code §§ 61-301, -501, -502, or -503 to suggest that the Legislature divested the Commission of its authority to determine how utilities will recover the cost of relocating utility facilities in their rates if public road relocations are involved. In these statues, the Legislature invested the Commission with broad authority to regulate the services, practices and contracts of utilities as they affect rates.

Although much is made of the Agencies' exclusive jurisdiction over the supervision, construction, operation, and maintenance of highways within their districts, Section 10 addresses the entirely separate issue of whether the utility relocation costs should be borne by the utility (and its customers) or by a third party who directly benefits from the relocation. This determination involves the reimbursement of the Company by the third party and has no impact on the public road agencies' jurisdiction over its rights-of-way. If Idaho Power seeks reimbursement from a third party for relocation costs assigned to the Company by a public road agency, it should be of no concern to the public road agency (which is not a party to subsequent reimbursement dealings).

Moreover, the Commission's Order does not seek to contravene the common law rule that the utility's use of the public road right-of-way is subordinate to the paramount use of public road right-of-way if that use interferes with the public benefit. Section 10

does not require any of the pubic road agencies to reimburse the Company for relocation costs where relocation is require to benefit the public. The Commission would have jurisdiction only over the portion of the relocation paid the by utility, and the utility's subsequent collection of the proportional amount that did not benefit the public interest from a third party.

Neither Idaho Power nor the Commission disagrees with ACHD that the public benefits from road projects funded by entities of government, third parties and developers. However, utility rates that include costs of utility relocation in public rights-of-way that have been inappropriately shifted from developers to utility customers – the majority of which live outside the area served by the public road agency – cannot be just and reasonable as required by Idaho Code §§61-301 and -502. Idaho Power customers in Pocatello do not benefit from roadway improvements for a new shopping center in Nampa, but they currently pay for relocation costs in excess of the public benefit in their rates. Section 10 addresses this issue of fundamental fairness and is squarely within the Commission's authority.

ACHD suggests that relocations "should be left in the hands of the highway districts, working in a coordinated effort with local government officials and utility companies to develop an approach that is mutually beneficial." ACHD Petition at 9. Idaho Power values its good working relationship with ACHD and believes that Resolution 330 has greatly contributed to that working relationship since its enactment in 1986. For this reason, Idaho Power wishes to extend Resolution 330's general framework through Rule H to its dealings with other public road agencies to make cost allocations of utility relocations more transparent and less susceptible to inappropriate

subsidization of local economic development. If public road agencies such as ACHD believe these results can be accomplished short of amending Rule H, the Company is certainly willing to explore these alternatives.

B. Third-Party Beneficiaries and Local Improvement Districts.

The Company agreed in its Reply Comments in this case to clarify the reference to "local improvement districts" ("LIDs") in Section 10. Rule H already includes a capitalized, defined term "Local Improvement Districts" in Section 1. This defined term is limited to local improvement districts created under Idaho Code § 50-2503, to provide for the study, financing, and construction of distribution line Installations or Alterations. By contrast, the uncapitalized term "local improvement districts" in Section 10 of Rule H is a broader term intended to cover any local improvement district created under authority of Idaho statutes. To clarify this intent, the Company recommends the addition of the following sentence in Section 10: "For purposes of this Section 10, 'local improvement district' includes any local improvement district created under the statutory procedures set forth in Idaho Code Title 50, Chapter 17."

ACHD asserts in its Petition for Consideration/Clarification that local improvement districts and public entities should be excluded from the definition of "third-party beneficiaries" in Section 10. The Company does not agree with this position. For instance, public agency developments such as a new office building may require the relocation of public road rights-of-way and the power lines located within those rights-of-way. In such case, the public agency benefiting from the relocation work should pay for the power line relocations, as opposed to the utility's customers as a whole. There is no meaningful difference here between the public agency requesting the relocation and a

private business requesting the relocation. Similarly, a local improvement district may be formed to finance a road/curb/gutter/sidewalk improvement project that requires the relocation of power poles located within the public road right-of-way. In this case, where the local improvement district is paying for the road improvements in question, the local improvement district should also pay for the cost of relocating the power line as required for the improvements. The local improvement district typically derives funding from adjacent private businesses and land owners and those parties, who are directly benefiting from the power line relocation, should bear the costs of the relocation, rather than the utility's customers as a whole.

ACHD also asserts in its Petition for Consideration/Clarification that ACHD has already established rules for the relocation of utility facilities and the allocation of the associated costs under its Resolution 330 adopted in 1986. Idaho Power has worked effectively with ACHD under Resolution 330 and does not intend to interfere with the ongoing application of Resolution 330. Accordingly, the Company recommends modification to its proposed Section 10 to state: "This Section shall not apply to utility relocations within public road rights-of-way of Public Road Agencies which have adopted guidelines for the allocation of utility relocation costs between the utility and third-party beneficiaries that are substantially similar to the rules set out in Section 10 of Rule H."

C. Procedure on Reconsideration.

ACHD requests reconsideration/clarification of Order No. 30853 by written briefs. Nampa and ACCHD have indicated that they will submit written briefs no later than August 12, 2009, that will present further legal argument and evidence on Section 10.

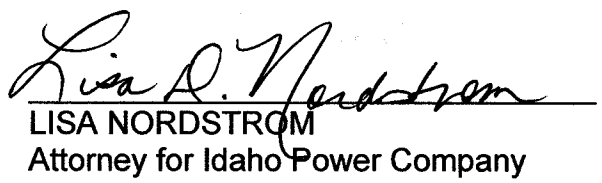
Idaho Power and the Agencies have already submitted detailed written arguments on the legal issues with regard to Section 10 of Rule H. Although it is not evident what additional legal arguments could be addressed on reconsideration that have not been raised and responded to previously, Idaho Power agrees that the filing of written briefs is the proper procedural mechanism to address legal issues on which the Commission seeks additional argument.

Nampa and ACCHD also request a hearing on reconsideration to present further argument. Idaho Power does not believe that a hearing would be a proper forum to debate the type of legal issues raised by the Agencies. If the Commission determines that written briefs are not sufficient to address the issues raised by the Agencies, Idaho Power believes an oral argument would better suit the legal nature of the issues present in this case.

III. CONCLUSION

The Commission's findings in Order No. 30853 were based upon substantial and competent evidence in the record. Idaho Power respectfully requests that the Commission issue an Order affirming its findings in Order No. 30853 and denying the Petitions for Reconsiderations filed in this case. If the Commission determines that it requires additional evidence upon which to make its reconsideration findings, Idaho Power requests that written comments/briefs and/or oral arguments be scheduled in lieu of a hearing for the reasons described above.

DATED at Boise, Idaho, this 29th day of July 2009.



LISA NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of July 2009 I served a true and correct copy of IDAHO POWER COMPANY'S ANSWER TO PETITIONS FOR RECONSIDERATION upon the following named parties by the method indicated below, and addressed to the following:

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