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IDAHO PUBLIC
UTILITIES COMMISSION

BARTON L. KLINE
Lead Counsel

August 28, 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-09-03
LANGLEY GULCH POWER PLANT

Dear Ms. Jewell:

Enclosed for filing are an original and seven (7) copies of Idaho Power Company's Answer to the Industrial Customers' of Idaho Power's Motion to Compel in the above matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "B. Kline".

Barton L. Kline

BLK:csb
Enclosures

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Idaho Public Utilities Commission
Office of the Secretary
RECEIVED

AUG 28 2009

Boise, Idaho

Attorneys for Idaho Power Company

Street Address for Express Mail:
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR A) CASE NO. IPC-E-09-03
CERTIFICATE OF PUBLIC)
CONVENIENCE AND NECESSITY FOR) IDAHO POWER COMPANY'S
THE LANGLEY GULCH POWER PLANT.) ANSWER TO THE INDUSTRIAL
) CUSTOMERS' MOTION TO COMPEL
)

COMES NOW, Idaho Power Company ("Idaho Power" or "Company") and, in accordance with RP 057, answers the Motion to Compel filed by the Industrial Customers of Idaho Power ("ICIP") on August 21, 2009. ICIP's Motion to Compel is based on several faulty assumptions and should be denied.

1. ICIP's Motion to Compel incorrectly characterizes the record regarding what, if any, role the Company's 2009 annual load forecast should play in the Commission's consideration of a Certificate for Public Convenience and Necessity ("CPCN") for Langley Gulch. In its Motion, ICIP asserts that during the July 2009

technical hearing, the Company promised to file the updated economic forecast with the Commission prior to the Commission completing its deliberation in this docket. (Motion to Compel, p. 1.) ICIP's assertion is not correct.

During the July 2009 hearing, Idaho Power offered to expedite the completion of the 2009 annual forecast and provide the 2009 annual load forecast to the Commission for use in its deliberations in this case *if the Commission desired the Company to do so*. The conditional nature of the offer by the Company is confirmed in the portion of Mr. Gale's testimony quoted on page 2 of ICIP's Motion to Compel.

The tension is the timing of information that can preclude that from happening. One of the key pieces of information as I detect the Commissioner questions is what's this August load forecast going to show and what is the resource balance resulting from it, and I would represent to you if it's the Commission's desire that we would provide that to you during the process of your deliberations, to the other parties as well, so it would be at least one additional piece of information when you're trying to make a decision on 2012 or not and I that that's the implication it has. (Emphasis added.)

Tr. 1208.

The Motion to Compel assumes that the Commission has expressed a desire to supplement the record in this case to include the 2009 annual load forecast. That assumption is incorrect. On July 28, 2009, the Commission sent an information request to the Company. The Commission's information request specifically referred to Mr. Gale's offer to provide post-hearing evidence. In its July 28, 2009, information request, the Commission requested data concerning actual weather normalized monthly energy sales data from August 2008 through July 2009. It also asked the Company to provide the August 2008, December 2008, and May 2009 monthly energy forecasts that were

made for 2009 for conditions of 50 percent load probability. The Company provided the requested information on August 11, 2009. Copies of the Commission's information request and the Company's response to that information request are enclosed as Attachment Nos. 1 and 2 to this Answer.

If the Commission believed it was necessary to supplement the record in this case to include the 2009 annual load forecast, it certainly could have made that a part of its production request. It did not.

2. ICIP's production request is unreasonably late. ICIP argues on pages 1 and 2 of its Motion to Compel that because the Company did not object to the Commission's July 28, 2009, production request, precedent had been set and ICIP should be allowed to pursue post-hearing discovery. ICIP incorrectly characterized the Commission's July 28, 2009, information request as coming from the Commission Staff. (Page 1, Motion to Compel.) Attachment No. 1 clearly shows that the information request is coming directly from the Commission, not the Staff. It is also directed strictly to evidence already in the record in this case. As a result, contrary to ICIP's argument, the July 28, 2009, information request from the Commission did not reopen the record in this case to allow for additional discovery. As the Company noted in its objection to ICIP's production request, the Commission's Notice of Scheduling issued in this case on April 20, 2009, established a June 5, 2009, cut-off on production requests.

3. On the bottom of page 3 of its Motion to Compel, the ICIP states, "Since the Company no longer intends to update its forecasts, the urgency in delaying a decision is underscored, especially given the fact that the Company is poised to release its 2009 forecast shortly after the Commission's final order is issued." ICIP's Motion

indicates that it does not understand how the Company updates its load forecasts. It is true that the Company intends to release its 2009 annual load forecast in the very near future. The 2009 annual load forecast will be used in the preparation of the Company's 2009 Integrated Resource Plan ("IRP"), which will be filed with the Commission by the end of the year. As Company witness Gale noted in his response to a question by Commissioner Smith during the technical hearing, the annual 2009 load forecast is the first foundational step in putting together the Company's IRP. (Tr. 1232.) Idaho Power will initially distribute copies of the load forecast used to prepare the 2009 IRP to the members of its Integrated Resource Plan Advisory Council ("IRPAC") for their review and comment prior to its final inclusion in the IRP document. In fact, the Company intends to provide the IRPAC with the 2009 annual load forecast results today or Monday.

ICIP's conclusion that the Company is not updating its load forecast is simply incorrect. The Company is updating its load forecast but it is doing so within the IRP process, in the same manner it always does.

4. As the Company noted in its Objection to ICIP's production request, the Commission already has substantial, competent evidence in the record in this case to make a determination as to whether or not it will issue a CPCN for the Langley Gulch project. The record in this case shows that the Company's May 2009 load forecast is a reasonable forecast of future loads that can be relied upon to support issuance of a CPCN for Langley Gulch. ICIP has already stated that it and the other Intervenors have no intention of accepting the 2009 annual load forecast if it shows that a resource like Langley Gulch is needed in 2012 or later. (Joint Motion to Renew Request for Stay, p.

10.) It should also be noted that the ICIP and the Irrigation Pumpers Association presented testimony from three expert witnesses criticizing the Company's load forecasts. But neither Intervenor presented its own load forecast.

In the final analysis, about the only thing we know for sure about any load forecast is that it is probably going to be incorrect in some respects and that it will be followed by another load forecast. Time-consuming discovery on the 2009 annual load forecast is not going to change that.

For all of these reasons, Idaho Power respectfully request that the Commission deny ICIP's Motion to Compel.

DATED this 28th day of August 2009.



BARTON L. KLINE
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of August 2009 I served a true and correct copy of the within and foregoing document IDAHO POWER COMPANY'S ANSWER TO THE INDUSTRIAL CUSTOMERS' MOTION TO COMPEL upon the following named parties by the method indicated below, and addressed to the following:

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Barton L. Kline

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-09-03

IDAHO POWER COMPANY

ATTACHMENT NO. 1

Bearry, Christa

From: Brenda Sorrell [Brenda.Sorrell@puc.idaho.gov]
Sent: Tuesday, July 28, 2009 2:41 PM
To: Kline, Bart; Betsy Bridge; Brad Purdy; Don Reading; Eric Olsen; Ken Miller ; Pete Richardson; Robert Kahn; Scott Woodbury; Susan Ackerman; Tony Yankel
Cc: Scott Woodbury
Subject: Commission Information Request -- Case No. IPC-E-09-03

Bart Kline

Lisa Nordstrom

Idaho Power Company

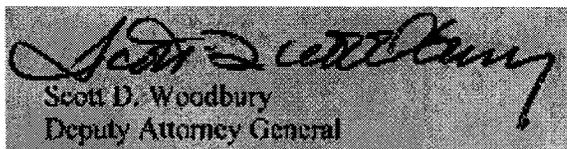
PO Box 70

Boise, ID 83707-0070

Re: Case No. IPC-E-09-03 (Langley Gulch)

Commission Information Request

As per Commission request and as a follow-up to an offer of evidence at hearing by Company witness Ric Gale, please provide weather normalized monthly energy sales from August 2008 through July 2009. In addition, please provide the August 2008, December 2008, and May 2009 monthly energy forecasts that were made for 2009 for conditions of 50% load probability. Include a brief narrative to describe and discuss the data.



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Deputy Attorney General

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-09-03

IDAHO POWER COMPANY

ATTACHMENT NO. 2

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR A)	CASE NO. IPC-E-09-03
CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY FOR)	IDAHO POWER COMPANY'S
THE LANGLEY GULCH POWER PLANT.)	RESPONSE TO THE COMMISSION'S
)	POST-HEARING INFORMATION
)	REQUEST

COMES NOW, Idaho Power Company ("Idaho Power" or "the Company"), and in response to the Commission's July 28, 2009, post-hearing information request, herewith submits the following information:

REQUEST: As per Commission request and as a follow-up to an offer of evidence at hearing by Company witness Ric Gale, please provide weather normalized monthly energy sales from August 2008 through July 2009. In addition, please provide the August 2008, December 2008, and May 2009 monthly energy forecasts that were made for 2009 conditions of 50% load probability. Include a brief narrative to describe and discuss the data.

RESPONSE TO REQUEST: The requested information is enclosed and includes:

1. Weather Normalized Energy Sales – January 2008 through July 2009;
2. Sales Forecast – August 2008;
3. Sales Forecast – December 2008; and
4. Sales Forecast – May 2009.

Idaho Power prepares an annual load forecast. It is used for several different purposes, including resource planning, financial forecasting, and preparation of the Operating Plan for risk management purposes. During the course of a year, the load forecast may be updated to account for new information and material changes.

In Mr. Bokenkamp's testimony in this case, he discussed the three load forecasts that are presented in this Response. The earliest of the three forecasts, the August 2008 forecast, was used to start the preparation of the 2009 IRP, which will be filed by the end of this year.

The December 2008 forecast is an update to the August 2008 forecast that was performed in response to the deteriorating conditions that were becoming evident in the Company's service area at that time. The December 2008 update adjusted the

residential and commercial sector to reflect a prolonged slowdown in housing and consumer spending. Residential new customer growth rates (initially forecasted to decline until the first quarter of 2009) were extended to continue the decline into 2010 and later rebound to the point of the original new customer forecast in 2016. Commercial customer growth counts were lowered based on a model driven by residential customer growth.

Because economic conditions continued to degrade, the Company performed another update to its load forecast in May of 2009. This update addressed the forecast loads for special contract customers. In this update, the load forecast was reduced again, with the largest reductions (94 aMW and 97 MW during peak hours) occurring in late 2009.

Load forecasts are generally differentiated to reflect a range of load uncertainty due to weather. The three case load forecasts prescribed in this Response assume median temperatures and median precipitation, i.e., there is a 50 percent chance that loads will be higher or lower than the expected case loads due to colder-than-median or hotter-than-median temperatures or wetter-than-median or dryer-than-median precipitation.

The weather normalized energy sales and forecast energy sales in each of the three sales forecasts are reported in megawatthours ("MWhs"). In addition, the weather normalized energy sales and energy sales in the three forecasts are sales that occur on a billing month basis and do not include line losses. The Company's weather-adjustment model adjusts actual billing month electricity sales for abnormal weather,

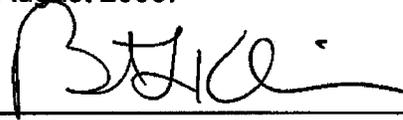
and the resulting weather-adjusted billed sales are the most accurate data to compare to forecast data to measure forecast accuracy.

Weather-adjusted sales for July 2009 were just 18,191 MWh (24 aMW) lower than predicted in the May 2009 forecast, a 1.3 percent difference. In addition, the May 2009 forecast included 6,696 MWh in July 2009 for Hoku Materials, Inc. ("Hoku"), a customer that has recently reconsidered their initial ramp-up schedule and are now expected to begin operation in December of 2009. Excluding Hoku, the July 2009 forecast would have only been 0.8 percent higher than the July 2009 weather adjusted sales figure. Excluding Hoku, the December 2008 and August 2008 forecasts would have only been 1.7 percent and 2.3 percent, respectively, higher than the July 2009 weather adjusted sales figure.

The recession that began in December 2007 turned out to be far more severe than expected. As a result, each successive Idaho Power load forecast was lowered as economic conditions worsened. The recession also caused the delay in the rollout plans that Hoku had originally planned. Conditions also changed at Micron Technology and their loads contracted by 30 percent. The national economy is now bottoming and the latest economic forecasts project that the recession will be over by late this year. With the recession nearing its end, the economic growth prospects for southern Idaho are good.

The response to this Request was prepared by Barr Smith, Planning Analyst, Idaho Power Company, in consultation with Barton L. Kline, Lead Counsel, Idaho Power Company.

DATED at Boise, Idaho, this 11th day of August 2009.

A handwritten signature in black ink, appearing to read "B. Kline", written over a horizontal line.

BARTON L. KLINE
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of August 2009 I served a true and correct copy of IDAHO POWER COMPANY'S RESPONSE TO THE COMMISSION'S POST-HEARING INFORMATION REQUEST upon the following named parties by the method indicated below, and addressed to the following:

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Barton L. Kline

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E-09-03

IDAHO POWER COMPANY

**RESPONSE TO COMMISSION'S
POST-HEARING INFORMATION REQUEST**

Weather Adjusted Sales
(megawatthours)

	Residential	Commercial	Irrigation	Industrial	Micron Technology	Simplot Fertilizer	INL	Raft River	HOKU	Total
January 2008	604,101	350,985	1,575	203,240	56,979	16,949	23,898	6,232	0	1,263,960
February 2008	559,093	339,630	1,374	201,074	53,349	15,823	21,850	5,294	0	1,197,487
March 2008	474,656	319,728	1,605	183,253	56,412	16,474	19,413	5,160	0	1,076,699
April 2008	406,047	306,727	17,743	183,093	54,126	15,979	16,127	4,586	0	1,004,428
May 2008	344,706	293,942	132,646	185,907	56,481	13,842	17,352	4,411	0	1,049,287
June 2008	331,076	313,403	297,315	191,581	55,301	10,951	15,435	4,204	0	1,219,265
July 2008	373,378	337,321	429,160	194,409	58,109	14,805	16,318	4,364	0	1,427,863
August 2008	429,963	353,082	428,376	200,375	57,844	16,010	16,559	4,246	0	1,506,452
September 2008	397,351	348,841	343,147	199,630	54,494	15,649	13,273	3,946	0	1,376,332
October 2008	331,463	324,669	168,579	181,775	55,238	15,765	16,378	4,297	0	1,098,163
November 2008	392,143	317,400	18,964	195,498	51,593	15,133	18,003	4,508	0	1,013,242
December 2008	516,636	338,548	2,386	188,624	51,127	13,888	20,379	5,625	0	1,137,214
January 2009	608,449	332,316	1,587	190,650	50,947	14,164	22,416	5,474	0	1,226,002
February 2009	546,169	336,528	1,447	178,672	45,507	14,548	19,287	4,828	0	1,146,986
March 2009	475,395	311,643	1,793	170,252	48,720	16,148	19,629	4,907	0	1,048,487
April 2009	411,973	303,851	18,638	180,298	46,175	15,604	17,109	4,406	0	998,054
May 2009	332,977	282,178	132,923	169,918	47,156	11,551	15,571	4,294	0	996,568
June 2009	327,226	301,007	253,289	187,132	45,306	3,088	15,285	3,706	0	1,136,039
July 2009	369,037	318,154	436,766	183,871	46,705	15,831	12,908	4,101	0	1,387,374

May 2009 Sales Forecast - 50/50 Probability

	Residential	Commercial	Irrigation	Industrial	Micron Technology	Simplot Fertilizer	INL	Raft River	HOKU	Total	Forecast vs Weather Adjusted	Percent Difference
January 2008	604,101	350,985	1,575	203,240	56,979	16,949	23,898	6,232	0	1,263,960	0	0.0%
February 2008	559,093	339,630	1,374	201,074	53,349	15,823	21,850	5,294	0	1,197,487	0	0.0%
March 2008	474,656	319,728	1,605	183,253	56,412	16,474	19,413	5,160	0	1,076,699	0	0.0%
April 2008	406,047	306,727	17,743	183,093	54,126	15,979	16,127	4,586	0	1,004,428	0	0.0%
May 2008	344,706	293,942	132,646	185,907	56,481	13,842	17,352	4,411	0	1,049,287	0	0.0%
June 2008	331,076	313,403	297,315	191,581	55,301	10,951	15,435	4,204	0	1,219,265	0	0.0%
July 2008	373,378	337,321	429,160	194,409	58,109	14,805	16,318	4,364	0	1,427,863	0	0.0%
August 2008	429,963	353,082	428,376	200,375	57,844	16,010	16,559	4,246	0	1,506,452	0	0.0%
September 2008	397,351	348,841	343,147	199,630	54,494	15,649	13,273	3,946	0	1,376,332	0	0.0%
October 2008	331,463	324,669	168,579	181,775	55,238	15,765	16,378	4,297	0	1,098,163	0	0.0%
November 2008	392,143	317,400	18,964	195,498	51,593	15,133	18,003	4,508	0	1,013,242	0	0.0%
December 2008	517,123	338,695	2,386	188,624	51,127	13,888	20,379	5,627	0	1,137,849	635	0.1%
January 2009	609,149	332,552	1,587	190,650	50,947	14,164	22,416	5,473	0	1,226,938	935	0.1%
February 2009	546,490	336,615	1,447	178,672	45,507	14,548	19,287	4,831	0	1,147,398	411	0.0%
March 2009	475,702	311,753	1,793	170,252	48,720	16,148	19,629	4,907	0	1,048,905	417	0.0%
April 2009	413,526	304,393	17,161	180,298	46,175	15,604	17,109	4,507	0	998,768	713	0.1%
May 2009	340,364	298,538	120,700	183,825	48,072	16,628	17,500	4,387	0	1,030,013	33,445	3.4%
June 2009	326,005	319,874	277,824	193,016	44,839	10,128	16,000	4,165	0	1,191,850	55,811	4.9%
July 2009	374,923	350,286	393,260	197,612	44,850	16,688	17,100	4,151	6,696	1,405,565	18,191	1.3%

December 2008 Sales Forecast - 50/50 Probability
(megawatthours)

	Residential	Commercial	Irrigation	Industrial	Micron Technology	Simplot Fertilizer	INL	Raft River	HOKU	Total	Forecast vs Weather Adjusted	Percent Difference
January 2008	604,101	350,985	1,575	203,240	56,979	16,949	23,898	6,232	0	1,263,960	0	0.0%
February 2008	559,093	339,630	1,374	201,074	53,349	15,823	21,850	5,294	0	1,197,487	0	0.0%
March 2008	474,656	319,728	1,605	183,253	56,412	16,474	19,413	5,160	0	1,076,699	0	0.0%
April 2008	406,047	306,727	1,743	183,093	54,126	15,979	16,127	4,586	0	1,004,428	0	0.0%
May 2008	344,706	293,942	132,646	185,907	56,481	13,842	17,352	4,411	0	1,049,287	0	0.0%
June 2008	331,076	313,403	297,315	191,581	55,301	10,951	15,435	4,204	0	1,219,265	0	0.0%
July 2008	373,378	337,321	429,160	194,409	58,109	14,805	16,318	4,364	0	1,427,863	0	0.0%
August 2008	429,959	353,081	428,375	200,375	57,844	16,010	16,559	4,246	0	1,506,446	-6	0.0%
September 2008	397,165	348,756	343,082	199,630	54,494	15,649	13,273	3,946	0	1,375,996	-337	0.0%
October 2008	331,372	324,659	168,543	181,775	55,238	15,765	16,378	4,293	0	1,098,022	-141	0.0%
November 2008	392,391	317,393	17,971	195,498	51,593	15,133	18,003	4,515	0	1,012,496	-747	-0.1%
December 2008	529,501	353,000	2,192	193,133	55,326	17,008	22,900	5,915	0	1,178,975	41,761	3.7%
January 2009	600,011	357,286	1,120	202,550	54,902	16,943	23,247	6,398	0	1,262,457	36,455	3.0%
February 2009	555,583	344,775	1,023	205,616	50,108	15,366	20,197	5,293	0	1,197,961	50,975	4.4%
March 2009	470,793	324,028	1,489	178,780	55,281	17,052	19,893	5,205	0	1,072,522	24,035	2.3%
April 2009	402,101	308,991	13,071	193,903	53,514	16,524	17,989	4,699	8100	1,018,892	20,838	2.1%
May 2009	340,364	298,538	120,700	183,825	55,786	16,963	16,452	4,504	16740	1,053,871	57,304	5.8%
June 2009	326,005	319,874	277,824	193,016	54,577	10,330	15,150	4,208	27864	1,228,848	92,809	8.2%
July 2009	374,923	350,286	393,260	197,612	57,862	17,024	16,169	4,203	28793	1,440,131	52,758	3.8%

2009 Basecase Forecast - Expected Case Scenario - SL-OUT N09A1_03 - December 17, 2008

August 2008 Sales Forecast - 50/50 Probability
(megawatthours)

	Residential	Commercial	Irrigation	Industrial	Micron Technology	Simplot Fertilizer	INL	Raft River	HOKU	Total	Forecast vs Weather Adjusted	Percent Difference
January 2008	604,101	350,985	1,575	203,240	56,979	16,949	23,898	6,232	0	1,263,960	0	0.0%
February 2008	559,317	339,716	1,374	201,074	53,349	15,823	21,850	5,300	0	1,197,803	316	0.0%
March 2008	474,836	319,793	1,605	183,253	56,412	16,474	19,413	5,160	0	1,076,945	246	0.0%
April 2008	406,368	306,837	1,709	183,093	54,126	15,979	16,127	4,581	0	1,004,819	391	0.0%
May 2008	344,899	293,999	132,328	185,907	56,481	13,842	17,352	4,411	0	1,049,219	-68	0.0%
June 2008	331,090	313,403	297,281	191,581	55,301	10,951	15,435	4,204	0	1,219,246	-19	0.0%
July 2008	373,378	337,321	429,160	194,055	58,109	14,805	16,318	4,364	0	1,427,510	-353	0.0%
August 2008	437,324	360,791	396,540	202,940	56,682	16,707	14,800	4,359	0	1,490,143	-16,309	-1.1%
September 2008	397,848	355,941	324,839	204,746	53,769	15,931	15,000	3,947	0	1,372,020	-4,312	-0.3%
October 2008	336,593	328,180	151,183	192,610	54,986	16,539	17,000	4,604	0	1,101,695	3,532	0.3%
November 2008	394,646	327,568	25,056	204,264	53,187	16,303	19,700	4,955	0	1,045,678	32,436	3.2%
December 2008	531,056	353,855	2,192	193,133	55,326	17,008	22,900	5,915	0	1,181,384	44,170	3.9%
January 2009	602,277	358,282	1,120	202,550	54,902	16,943	23,247	6,398	0	1,265,719	39,717	3.2%
February 2009	557,952	345,966	1,023	205,616	50,108	15,366	20,197	5,293	0	1,201,521	54,535	4.8%
March 2009	473,210	325,193	1,489	178,780	55,281	17,052	19,893	5,205	0	1,076,104	27,617	2.6%
April 2009	404,909	310,292	13,071	193,903	53,514	16,524	17,989	4,699	8,100	1,023,002	24,948	2.5%
May 2009	343,417	301,403	120,700	183,825	55,786	16,963	16,452	4,504	16,740	1,059,790	63,222	6.3%
June 2009	329,286	322,672	277,824	193,016	54,577	10,330	15,150	4,208	27,864	1,234,928	98,889	8.7%
July 2009	379,075	353,474	393,260	197,612	57,862	17,024	16,169	4,203	28,793	1,447,472	60,098	4.3%

2009 Basecase Forecast - Expected Case Scenario - SL-OUT N09A1_01 - August 21, 2008