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Attorney for the Commission Staff

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

> IN THE MATTER OF THE APPLICATION OF ) IDAHO POWER COMPANY FOR AUTHORITY ) TO IMPLEMENT POWER COST ) ADJUSTMENT (PCA) RATES FOR ELECTRIC ) SERVICE FROM JUNE 1, 2009 THROUGH MAY) 31, 2010.

CASE NO. IPC-E-09-11

## COMMENTS OF THE

 COMMISSION STAFFThe Staff of the Idaho Public Utilities Commission, by and through its Attorney of Record, Weldon B. Stutzman, Deputy Attorney General, submits the following comments in response to Order No. 30786 issued on April 23, 2009.

## BACKGROUND

Since 1993, the PCA mechanism has permitted Idaho Power to establish PCA rates to recover allowed variations from normal power supply costs. Base rates, established in a general rate case, recover normal power supply costs. The main components of variable power supply cost are fuel costs (coal and natural gas) and purchased power costs. These costs are offset with off-system sales revenues. Idaho Power Company's power supply costs vary annually based on streamflow at hydro power generating facilities, the market price of power, and other factors.

The annual PCA surcharge or credit is combined with the Company's "base rates," and other non-base rates, to produce a customer's overall energy rate.

On April 15, 2009, Idaho Power Company filed its annual power cost adjustment (PCA) Application. In this PCA Application, Idaho Power calculates that its annual power costs have increased above normal amounts. To recover the increased power costs, the Company estimates that existing PCA rates must increase to recover an additional $\$ 93.8$ million. The proposed increase averages $11.4 \%$ but impacts different customer classes differently. The lowest proposed class increase is $3.8 \%$ and the largest proposed increase is $18.7 \%$ for a special contracts customer.

## THE PCA MECHANISM

The annual PCA mechanism is comprised of three major components. The first component, projected or forecasted power cost, is computed using the results of the Company's most recent Operating Plan (OP Plan). This method replaces the previous method that was based on a forecast of Brownlee Reservoir inflow and a regression formula derived from rate case power supply cost data. The Commission directed use of the new method for projecting power costs in an effort to improve forecast accuracy. The old method resulted in forecasts that differed substantially from actual results. Order No. 30715. In the new method, streamflow remains a major factor used to project power costs. In addition to streamflow, the new method includes updated projections for load, market price, resource availability and many other variables. It also includes the costs of power supply transactions already made for the PCA year. The new method of projecting power supply costs is expected to be significantly more accurate.

In general, in years of abundant snowpack and streamflow, the Company's power supply costs are lower. Hydropower is the Company's lowest cost major resource. Conversely, when snowpack and resulting streamflows are low, Idaho Power must rely increasingly upon its thermal generating resources and purchased power from the regional market. The Company's thermal generating resources (coal and gas plants) and purchased power are typically much more costly than the Company's hydro-generation. Under the PCA mechanism, beginning February 1, 2009, the Company may recover $95 \%$ of the difference between projected power costs and normal power costs included in base rates. Order No. 30715.

Because the PCA includes forecasted costs, the second PCA component consists of a true up from the preceding year's forecasted costs to the actual costs incurred in the prior year. In
recent years, the true-up balance has been reduced using revenue from the sale of sulfur dioxide (SO2) allowances.

The third component is the "true-up of the true-up," or reconciliation of the previous year's true-up. This component is designed to ensure the Company recovers the actual approved costs. Idaho Power uses "normalized" power sales (measured in kilowatt-hours (kWh)) from the ensuing PCA year as the denominator to compute the adjusted true-up rate. Over- or underrecovery is balanced with the following year's true-up.

In a poor water, high cost year, Idaho ratepayers pay a large portion of Idaho Power Company's abnormal power supply costs. In a good water, low cost year, Idaho ratepayers are credited with a large portion of the below normal cost savings.

## IDAHO POWER'S PCA APPLICATION

## A. The PCA Components

This year's PCA Application includes the 2009-2010 forecast of power supply costs; a true-up of last year's forecasted costs to reflect actual costs and revenues; and reconciliation of the 2008-2009 PCA year true-up (the true-up of the true-up). The Company calculates that the net forecasted power supply cost is $\$ 260.1$ million for the 2009-2010 PCA year. This is $\$ 106.0$ million more than the $\$ 154.1$ million included in Base Rates. After adjustments and PCA sharing, this results in a forecast rate of $0.5662 \phi / \mathrm{kWh}$.

Idaho Power reports that the difference between last year's normal and actual power supply costs adjusted by revenue generated from the forecast rate, the true-up component, is $\$ 107.9$ million. The true-up amount becomes $\$ 103.3$ million after it is reduced by approximately $\$ 4.6$ million to reflect S 02 sales revenues. Application, p. 4. The Company calculates the trueup portion of the PCA rate to be $0.7465 \phi / \mathrm{kWh}$.

The third PCA rate element is the "true-up of the true-up" or reconciliation of the previous year's true-up. Last year the Company under-collected the PCA deferral balance by $\$ 22.0$ million. Application, p. 4. Dividing this amount by the projected 2009 Idaho jurisdictional sales of $13,838,689 \mathrm{MWh}$ results in a PCA surcharge rate of $0.1590 \mathrm{~d} / \mathrm{kWh}$. Id .

Combining the three components - the projected power costs rate of $0.5662 \phi / \mathrm{kWh}$, the true-up rate of $0.7465 \phi / \mathrm{kWh}$ and the true-up of the true-up rate of $0.1590 \phi / \mathrm{kWh}$ - results in a proposed PCA surcharge rate for the 2009-2010 PCA year of $1.4717 \phi / \mathrm{kWh}$. This represents an increase of $0.6853 ¢ / \mathrm{kWh}$ above the existing PCA rate of $0.7864 \phi / \mathrm{kWh}$.

## B. Impact of the Company's Rate Proposal

Idaho Power has proposed to implement the PCA rate on June 1, 2009. The proposed PCA rate represents an overall average percentage increase of $11.4 \%$ in Company revenue. Although the PCA rate is an equal cents per kWh adjustment for all customers, each customer class will receive a different percentage increase due to the different energy rates in effect for the different customer classes. The table below shows the proposed increases in the PCA rates for the major customer classes:

| Customer Group <br> (Schedule) | Percentage <br> Increase |
| :--- | :---: |
|  |  |
| Residential (1) | $9.30 \%$ |
| Small Commercial (7) | $7.56 \%$ |
| Large Commercial (9) | $12.58 \%$ |
| Industrial (19) | $15.64 \%$ |
| Irrigation (24) | $11.08 \%$ |

The PCA rates for Idaho Power's three special-contract customers (Micron, Simplot, and the Department of Energy (INL)) would also increase. Under the Company's proposal the PCA rate increase for the three special-contract customers would be $17.68 \%$ for Micron, $18.71 \%$ for Simplot, and $18.36 \%$ for the Idaho National Laboratory.

Attachment A to these comments is a chart that shows the magnitude of the PCA for each year since its inception in 1993. For 2009, both the Company and Staff proposals are shown. Attachment B shows a history of Idaho Power's residential energy rates and identifies the PCA components. The chart also shows the Company and Staff proposals for 2009.

## STAFF AUDIT AND ANALYSIS

The PCA has three components: 1) a forecast component; 2) a true-up component that corrects for the previous years forecast error; and 3) a true-up of the previous year's true-up that is a final correction. Set out below are the Staff's comments on the three PCA components.

## A. The PCA Forecast

As previously discussed, the forecast is now prepared from the Company's most recent Operating Plan (OP Plan). The OP Plan incorporates the most current information available in each update. An account by account breakdown of the Company's forecast proposal is shown on

Attachment C to these comments. The chart shows the amount included in Base Rates, the Forecast amount and the Difference. Account 555 - PURPA Purchases is shown separately from other Account 555 Purchases because differences in PURPA Purchases are not shared, the entire difference is passed on to customers.

Lines 1 through 14 of page 1 of Attachment D show the Company's calculation of the Forecast Rate. Line 3 shows the expected reduction due to Hoku first block revenues and line 5 shows the customer sharing percentage that is applied to all power supply cost differences, except the difference in PURPA costs. Line 8, Column (g), shows the forecast rate excluding the portion of the forecast rate associated with the expected PURPA cost difference. This rate is $0.6451 \not \subset / \mathrm{kWh}$. Lines 10 through 12 show the calculation of the portion of the Forecast Rate associated with the expected difference in PURPA costs. This portion of the rate is negative because expected PURPA costs are less than PURPA costs included in base rates. This rate is $-0.0789 ~ d / \mathrm{kWh}$. The two portions of the forecast rate combined produce the forecast rate shown on line $14,0.5662 ¢ / \mathrm{kWh}$. Among other things, this rate reflects expected below normal water conditions. Under the new forecast methodology, Idaho Power does its own water forecast, however, the Northwest River Forecast Center expects April through July Brownlee Reservoir inflows to be $81 \%$ of normal.

Since the filing of this case the Company has updated its Operating Plan. Use of the updated plan reduces forecasted system power supply costs by approximately $\$ 10.7$ million. The recalculated forecast rate of $0.4967 \phi / \mathrm{kWh}$ is shown on page 2 of Attachment D , line 14 .

Staff proposes that the Commission adopt a different Forecast Rate than those previously discussed in an effort to phase in the change in forecast methodology and to mitigate the large increase proposed by the Company in this case. As shown on page 3 of Exhibit D, Staff proposes a forecast rate of $0.2500 \mathrm{~d} / \mathrm{kWh}$. This rate is expected to recover approximately $\$ 34.6$ million of the $\$ 68.0$ million that the updated forecast would require. To the extent that this forecast rate under-recovers the difference between actual and normal power supply cost, the unrecovered costs will be captured in next year's true-up. Staff is very much aware that the trueup methodology was changed to improve the forecast and that a rate that does not reflect the improved forecast leaves money to be recovered the following year in the true-up just like a poor forecast would. However, Staff believes the size of the proposed increase and the size of the true up rate in place from a poor forecast last year justifies modifying the result for this year's PCA forecast. Also, the proposed increase is over the 7\% threshold established by the Commission at
which level spreading the increase over multiple years would be considered. Staff's proposal spreads the recovery of forecast costs over two years. The forecast proposed by the Company is the largest ever. The forecast proposed by Staff, produces the second largest forecast of record. This attests to the enhanced accuracy of the forecast methodology and the likelihood of a reduced true up next year.

## B. The PCA True-Up

The PCA true-up captures the difference between normal and actual power supply costs adjusted by revenue from the forecast rate. Rates were set in the previous PCA period to collect or refund to customers the difference between the projected power supply costs and those costs reflected in rates. This difference is the PCA deferral balance. This deferral balance, when surcharged or refunded to customers is known as the PCA true-up rate component.

Exhibit No. 1 to Idaho Power witness Scott Wright's testimony illustrates the calculation of the true-up deferral amount. To verify revenues and costs associated with Idaho Power's trueup deferrals, Staff conducted an audit of actual revenues and expenses that occurred during the PCA year. These revenues and costs included the cloud seeding program, fuel expenses for coal, fuel expenses for natural gas, and power purchases and sales. Staff also examined the Emission Allowance Sales Credit and the Risk Management operating plan.

Attachment $E$ is Staff's calculation of the true-up deferral amount before it is reduced by the Emission Allowance Sales Credit. A summary of the true-up is the following.

| Idaho Jurisdictional Items | MILLIONS |
| :--- | :---: |
| Last Year's Forecast Revenue | $\$(3.7)$ |
| Last Year's Above Normal Power Supply Costs (Shared) | $\$ 143.0$ |
| Last Year's Above Normal PURPA Facilities Costs | $\$(33.9)$ |
| Interest | $\$ 2.5$ |
| True-up Expense (Deferral) | $\$ 107.9$ |
| Emission Allowance Sales Credit | $\$(4.6)$ |
| Total True-up Deferral with Emission Allowance Sales Credit | $\$ 103.3$ |

Staff's true-up recommendation differs slightly from Idaho Power's due to a small difference in the Emission Allowance Sales Credit discussed later in these comments. The following items are included in the PCA true-up.

1. Base Power Supply. During the past PCA year actual power supply costs have been measured against portions of three different base periods to determine deferral amounts. The first base was in place for April and May of 2008 ( 2 months), the second base was in place June 2008 through January 2009 ( 8 months) and the third base was in place during February and March of 2009 ( 2 months). In the Company's last PCA case the Commission approved redistribution of the monthly AURORA base amounts to average monthly amounts. The first two base periods in this true-up year used this distribution. The third base period in this true-up year also redistributed the AURORA base. For the third base period, the Company has been authorized to redistribute or shape base power supply costs according to the monthly distribution of Idaho Jurisdictional Revenues. Since monthly deferral amounts are a calculation of the difference between the actual power supply costs and base power supply costs, monthly deferral amounts differ because the base has been redistributed or reshaped. The net difference for the true-up year in this case is approximately $\$ 3.4$ million to the customers' benefit. Monthly differences can be large and customers may not always benefit. Staff proposes to track the differences each year and to propose changes to the methodology if the differences becomes unacceptable.
2. SO2 Proceeds. Commission Order No. 30790 in Case Nos. IPC-E-09-08 and IPC-E-08-14 was issued on May 1, 2009 and ordered that $\$ 5,347,453$ of Emission Allowance Sales ( $\$ 5,299,875$ plus accrued interest of $\$ 47,578$ as of March 31,2009 ) be used to offset the Company's PCA deferral balance this year. This is a system number. The amount used by the Company for the Emission Allowance sales credit is $\$ 4,591,632$. This is the Idaho jurisdictional amount and includes interest through March 2009. As shown on page 3 of Attachment D, line 20 in the "Base" column of Staff's Recommendation, the SO2 credit amount with interest through May 31, 2009 is $\$ 4,600,857$. The difference between the amounts used by the Company in its PCA filing and Staff's recommendation is due to interest on the SO2 credit balance for April and May 2009. The SO2 credit is a benefit to customers.
3. Cloud Seeding Program. Cloud seeding expenses have been recorded in the PCA since October 2006. In Case No. IPC-E-05-28, Order No. 30035, monthly cloud seeding expenses were incorporated into base rates. In this PCA period, the cloud seeding expense in base rates is $\$ 719,261$. The actual amount of expense for the Cloud Seeding Program for the PCA period from April 2008 through March 2009 is $\$ 608,785$. Actual expenses are less than the
expense in base rates by $\$ 110,476$. This represents a benefit to customers and is subject to jurisdictional allocation and sharing.
4. Fuel Expense - Coal. A large portion of Idaho Power's electricity comes from thermal power produced from coal plants. The three coal plants that Idaho Power owns an interest in are Bridger, Valmy and Boardman. The increase or decrease in the coal expense from base rates is included in the PCA for recovery from or refund to customers. For the audit period of April 2008 to March 2009, the total coal expense for all plants in operation is $\$ 135,782,138$. The total coal expense included in base rates is $\$ 112,483,839$. This year's PCA deferral balance includes a difference between costs currently included in rates and actual costs of $\$ 23,298,299$. This cost to customers is subject to jurisdictional allocation and sharing.
5. Fuel Expense - Gas. Idaho Power currently owns and operates gas-fired combustion turbine generating plants at the Evander Andrews Power Complex (3 Danskin units) and Bennett Mountain. These plants are both located at Mountain Home and account for $100 \%$ of gas usage.

For the audit period of April 2008 to March 2009 the total variable gas and gas transportation expense for both complexes was $\$ 15,196,631$; down from $\$ 20,823,773$ during the last PCA period. The total gas and gas transportation expense included in base rates is $\$ 11,108,299$. The increase or decrease in gas expense from base rates is included in the PCA for recovery from or refund to customers. In this year's PCA deferral balance, the additional gas expense that is included for future recovery from customers is $\$ 4,088,322$ and is subject to jurisdictional allocation and sharing.
6. Power Sales and Purchases. Staff reviewed the power purchases and sales in conjunction with the Company's Risk Management Operating Plans. Our analysis did not find any transaction that was not reasonable or did not follow the Risk Management Committee's recommendations. These transactions were made with an assortment of credit-worthy partners on a timely basis, and there were no transactions conducted with an Idaho Power affiliate.
a. Power Sales. During the PCA year ending March 31, 2009, the Company sold surplus power totaling $\$ 107,888,656$. The total surplus sales included in base rates is $\$ 124,387,177$. The increase or decrease in the power sales from base rates is included in the PCA for recovery from or refund to customers and is subject to jurisdictional allocation and sharing. Actual surplus sales were less than base amounts by $\$ 16,498,521$. This difference is a reduction of revenues to the detriment of customers and is subject to jurisdictional allocation and sharing.
b. Power Purchases including Telocaset and Raft River. Power purchases included in base rates are shown on Line 34, Attachment E. Market purchases, Telocaset Wind Power Partners, and Raft River (the shared portion) are combined in this base number. On the PCA spreadsheet, the actual amounts for these three purchase types are stated as separate line items.

During the PCA year ending March 31, 2009, the Company made market purchases, excluding PURPA contracts. The actual amount is $\$ 151,742,384$.

Beginning in November 2007, Idaho Power began receiving power from Telocaset Wind Power Partners project. This wind project was included in base rates in the last general rate case, Case No. IPC-E-07-08, Order No. 30508. The actual amount included in this year's PCA is \$13,720,772.

On October 5, 2007, Idaho Power Company filed an application requesting an accounting order authorizing the inclusion of all power supply expenses associated with the purchase of energy from Raft River Energy I LLC in the Power Cost Adjustment mechanism. The underlying Power Purchase Agreement (PPA) for 13 MW is pursuant to a company Request for Proposal for geothermal resources and is the initial agreement with the U.S. Geothermal, Inc. of what will total 45.5 MW of geothermal energy. In Order No. 30485, the Commission found that the Company's proposal to recover $100 \%$ of the Power Purchase Agreement-related costs through its Power Cost Adjustment mechanism to be acceptable only for the first 10 aMW of PPA generation, and that the remaining PPA generation is subject to the PCA treatment accorded non-PURPA projects, and therefore subject to sharing. The actual Raft River amount included for non-PURPA recovery (the shared amount) is $\$ 274,426$. The remaining Raft River amount is included below in section 7 .

The total power purchases, including market power, Telocaset Wind Power Partners and the portion of Raft River subject to sharing is $\$ 165,737,582$ ( $\$ 151,742,384$ plus $\$ 13,720,772$ plus $\$ 274,426$ ). The total power purchases included in base rates is $\$ 40,862,142$. Actual purchased power amounts exceed base amounts by $\$ 124,875,440$. This difference is a cost to customers and is subject to jurisdictional allocation and sharing.
7. Actual Qualifying Facilities Purchases Including Net Metering and Raft River. A Qualifying Facility (QF) is a generating facility which meets the requirements for QF status under the Public Utility Regulatory Policies Act of 1978 (PURPA) and Part 292 of the Federal Energy Regulatory Commission's Regulations (18 C.F.R. Part 292), and which has obtained certification of its QF status. There are two types of QFs - cogeneration facilities and small
power production facilities. Qualifying Facilities are sometimes referred to as cogeneration/small power producers or by the acronym CSPP.

A Cogeneration Facility is a generating facility that sequentially produces electricity and another form of useful thermal energy (such as heat or steam) used for industrial, commercial, residential or institutional purposes, and otherwise meets the requirements of 18 C.F.R. §§ 292.203(b) and 292.205 for operation, efficiency and use of energy output.

A Small Power Production Facility is a generating facility whose primary energy source is renewable (hydro, wind, solar, etc.), biomass, waste, or geothermal resources, and that otherwise meets the requirements of 18 C.F.R. §§ 292.203(a), 292.203(c) and 292.204. Small power production facilities are limited in size to 80 MW , with the exception of certain types of facilities certified prior to 1995 and designated as "eligible" under section 3(17)(E) of the Federal Power Act (FPA) (15 U.S.C. § 796(17)(E), which have no size limitation.

For the audit period of April 2008 through March 2009 the actual QF expense is $\$ 46,967,783$. The Raft River amount included in the true-up deferral balance at $100 \%$ recovery is $\$ 4,758,932$. The total actual QF expense, including Raft River is $\$ 51,726,715$. The QF expense included in base rates is $\$ 87,541,896$. The increase or decrease in the QF expense from base rates is included in the PCA for recovery from or refund to customers. In this year's PCA deferral balance, the actual QF expense was less than the base QF by $\$ 35,815,181$. This amount is a benefit to customers and reduces the PCA deferral balance. PURPA contracts are not currently subject to sharing. They are subject to jurisdictional allocation.
8. Third Party Transmission. In Order No. 30715, Case No. IPC-E-08-19, the Commission found that third-party transmission costs that are incurred in conjunction with market purchases and sales should be tracked through the PCA like other variable power supply costs, and that including the expenses in the PCA is a straightforward treatment of power supply costs that fluctuate with power purchases and sales.

For the audit period of April 2008 to March 2009, the actual third party transmission expense is $\$ 790,343$. The Third Party Transmission expense included in base rates is $\$ 1,650,586$. This year's PCA deferral balance includes a difference between costs currently included in rates and actual costs of $\$ 860,243$. Since the actual costs are less than the amount included in base rates, this amount represents a benefit to customers. This benefit to customers is subject to jurisdictional allocation and sharing.
9. Water Lease Purchases. The actual amount included in the balance for water lease purchases in the current PCA period is $\$ 2,391,740$. This is an expense that does not occur in every PCA period. For example, in the last PCA period there were no water lease purchases. However, the PCA is the proper venue for recovery of water lease purchases. This expense is a cost to customers and is subject to jurisdictional allocation and sharing.

## C. The PCA True-Up of the True-Up

The PCA true-up of the true-up amount is the difference between what was anticipated to be collected or refunded when the PCA rate for last year's true-up was set and what was actually collected or refunded. The amount represents the under or over recovery of the true-up amount from the previous year due to a different amount of kWh being sold than was anticipated in the rate design. The true-up of the true-up is a benefit to both the Company and customers because any true-up over collection is returned to customers, and any true-up under collection is recovered by the Company.

The true-up amount set for recovery in last year's PCA case (Case No. IPC-E-08-07) was approximately $\$ 124.1$ million and the rate calculated to recover that amount from customers was $0.7504 \phi / \mathrm{kWh}$. With other adjustments and interest considerations, the approved rate under collected the true-up amount by $\$ 22.0$ million. As shown on page 3 of Attachment D, line 23, this amount is used to calculate the true-up of the true-up PCA rate component of $0.1590 \mathrm{~d} / \mathrm{kWh}$. This is the same rate the Company calculated.

## PCA RATES

The Staff's calculated PCA rate of $1.1554 \phi / \mathrm{kWh}$ is the sum of the three components listed above $(0.2500+0.7464+0.1590=1.1554)$. This rate is shown on page 3 of Attachment D, line 26. As previously discussed, Staff includes approximately one-half of the Company's updated forecast for the coming year and, therefore, proposes 0.2500 for the forecast rate. The true-up rate, 0.7464 , is based on the true-up amounts included in the Company's filing with a small interest adjustment proposed by Staff. The true-up of the true-up rate, 0.1590 , is the same rate included in the Company's filing. Staff Attachment F summarizes all PCA rate components and their associated expense amounts. Page 1 shows the Company's case and page 2 shows the Staff's case. The Attachments also show amounts allocated to other jurisdictions and amounts shared with shareholders.

Page 1 of Attachment $G$ shows the proposed average increase above base rates by class and page 2 of Attachment $G$ shows the proposed average increase above existing rates by class. Staff proposes that existing rates be increased by $\$ 50.5$ million which produces an average increase to Idaho Power's customers of $6.14 \%$. This compares to the Company's filed proposal to increase rates $\$ 93.8$ million, approximately $11.4 \%$. Attachment G shows the proposed increases for all customer classes. Staff's proposed increase for residential customers is 5.01\%.

In both of these attachments the percentage increase to larger customers is substantially more than the average percentage increase. When power supply costs increase rates, larger customers receive larger than average percentage increases. This results because large customers have lower base rates than other customers and an equal cents $/ \mathrm{kWh}$ increase makes a larger percentage difference to them than it does to smaller customers whose base rates are higher.

## CONSUMER ISSUES

Idaho Power's PCA Application, filed on April 15, 2009, contained both the customer notice and press release. Staff reviewed them and determined that they complied with the notice requirements of IDAPA 31.21.02.102. The customer notice was mailed with Idaho Power's cyclical billings beginning April 24, 2009 and ending May 22, 2009. Customers had until May 14,2009 to file comments.

An informational customer workshop was scheduled in Boise on May 5, 2009 at 7:00 p.m. No customers attended the meeting.

By May 13, 2009, thirty-four customers had sent comments to the Commission regarding the PCA. One-third of those who sent comments mentioned that water was seemingly plentiful this year and so did not understand why poor water was cited by Idaho Power as a major factor in its need to increase rates in this year's PCA filing. One-half of those commenting questioned why the current economic downturn was not a valid reason for the Commission to tell the Company "no" to any rate increases at this time.

## PCA RECOMMENDATIONS

The Staff's recommendation differs substantially from the Company's in the amount of the forecast to be passed to customers in this year's PCA rates. In addition to the reasons for Staff's recommendation that have been previously given, Staff believes that the large true up rate that will almost certainly be put in place in this case will expire next year. Staff believes that it is
probable that the remainder of the unrecovered forecast can be moved to next year's true up without a rate increase.

Staff recommends that a PCA rate of $1.1554 \phi / \mathrm{kWh}$ be established by the Commission with an effective date of June 1, 2009.

Respectfully submitted this $14^{\text {th }}$ day of May 2009.


Weldon B. Stutzman
Deputy Attorney General

# Technical Staff: Keith Hessing Kathy Stockton Marilyn Parker 

HISTORY OF PCA AMOUNTS

PCA Year




| 2009-2010 PCA - Seventeenth Annual IPC-E-09-11 <br> Company Case with Updated OP Plan |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| (a) | (b) | (c) | (d) | (e) | (f) | (g) |
| Line | Description | Units | Base | Forecast | Difference | Rate |
| 1 | Projection 2009-2010: |  |  |  |  |  |
| 2 | PCA Expense (95\%) | (\$) | 90,780,502 | 197,692,328 |  |  |
| 3 | Hoku First Block Revenue Reduction | (\$) |  | 18,539,291 |  |  |
| 4 | Difference | (\$) |  | 179,153,037 | 88,372,535 |  |
| 5 | Sharing Percentage | (\%) |  |  | 0.95 |  |
| 6 | Shared Difference | (\$) |  |  | 83,953,908 |  |
| 7 | Normalized System Firm Sales | (MWH) |  |  | 14,586,634 |  |
| 8 | Rate for $95 \%$ ltems | ( $¢ / \mathrm{kWh}$ ) |  |  | 0.5756 | 0.5756 |
| 9 |  |  |  |  |  |  |
| 10 | PCA Expense (100\%) | (\$) | 63,269,889 | 51,767,620 | $(11,502,269)$ |  |
| 11 | Normalized System Firm Sales | (MWH) |  |  | 14,586,634 |  |
| 12 | Rate for $100 \%$ Items | ( $¢ / \mathrm{kWh}$ ) |  |  | (0.0789) | (0.0789) |
| 13 |  |  |  |  |  |  |
| 14 | Total Forecast Rate | ( $/$ /kWh) |  |  |  | 0.4967 |
| 15 |  |  |  |  |  |  |
| 16 |  |  |  |  |  |  |
| 17 |  |  | (\$) | (MWh) | (\$/MWh) | ( $\phi / \mathrm{kWh}$ ) |
| 18 |  |  |  |  |  |  |
| 19 | True-Up of 2008-2009: |  | 107,891,769 | 13,838,689 | 7.796386565 | 0.7796 |
| 20 | SO2 Credit (Case No. IPC-E-09-08) |  | (4,591,632) | 13,838,689 | -0.331796748 | (0.0332) |
| 21 | Total |  | 103,300,137 |  |  | 0.7465 |
| 22 |  |  |  |  |  |  |
| 23 | True-Up of the True-Up: |  | 22,003,335 | 13,838,689 | 1.589986956 | 0.1590 |
| 24 |  |  |  |  |  |  |
| 25 | PCA Rates: |  |  |  |  |  |
| 26 | PCA Rate Adjustment From Base | ( $/ 1 \mathrm{kWh}$ ) |  |  |  | 1.4022 |
| 27 | PCA Rate Currently in Effect | ( $/ \mathrm{kWh}$ ) |  |  |  | 0.7864 |
| 28 | Difference - Last Year to This Year | ( $\phi / \mathrm{kWh}$ ) |  |  |  | 0.6158 |

Note: Negative rates and amounts indicate benefits to ratepayers.


# TRUE-UP CALCULATIONS FOR 2008-2009 

## FOR

IDAHO POWER COMPANY PCA
CASE NO. IPC-E-09-11

| 1 DESCRIPTION | Units | $\begin{aligned} & 2008 \\ & \text { APR } \end{aligned}$ | $\begin{aligned} & 2008 \\ & \text { MAY } \end{aligned}$ | $\begin{gathered} 2008 \\ \text { JUN } \end{gathered}$ | 2008 JUL | $\begin{aligned} & 2008 \\ & \text { AUG } \end{aligned}$ | $\begin{aligned} & 2008 \\ & \text { SEPT } \end{aligned}$ | $\begin{aligned} & 2008 \\ & \text { OCT } \end{aligned}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 3 PCA Revenue |  |  |  |  |  |  |  |  |
| 4 Normalized Idaho Jurisd. Sales | MWh | 963,083 | 976,345 | 1,119,936 | 1,321,246 | 1,413,185 | 1,272,063 | 1,035,883 |
| 5 Forecast Rate | $\mathrm{m} / \mathrm{KWh}$ | 1.888 | 1.888 | 0.000 | 0.000 | 0.000 | 0.000 | 0.000 |
| 6 Revenue | \$ | 1,818,301 | 1,843,339 | 0 | 0 | 0 | 0 | 0 |
| 7 |  |  |  |  |  |  |  |  |
| 8 Load Change Adjustment |  |  |  |  |  |  |  |  |
| 9 Actual System Firm Load - Adjusted | MWh | 1,118,663 | 1,332,870 | 1,472,374 | 1,765,357 | 1,628,972 | 1,268,631 | 1,115,235 |
| 10 Normalized Firm Load | MWh | 1,099,424 | 1,224,099 | 1,426,753 | 1,702,096 | 1,588,393 | 1,247,908 | 1,130,773 |
| 11 Load Change | MWh | 19,239 | 108,771 | 45,621 | 63,261 | 40,579 | 20,723 | $(15,538)$ |
| 12 Expense Adjustment | \$ | $(604,008)$ | $(3,414,866)$ | (1,432,271) | $(1,986,079)$ | $(1,273,978)$ | $(650,599)$ | 487,816 |
| 13 |  |  |  |  |  |  |  |  |
| 14 Non-QF PCA |  |  |  |  |  |  |  |  |
| 15 ACTUAL: |  |  |  |  |  |  |  |  |
| 16 Water Lease Purchases | \$ | 0 | 0 | 0 | 0 | 1,080,695 | 1,108,842 | $(6,797)$ |
| 17 Cloud Seeding Program | \$ | 24,877 | 126,300 | 20,562 | 32,578 | 29,738 | 44,700 | 55,584 |
| 18 Fuel Expense - Coal | \$ | 7,833,016 | 8,351,409 | 9,218,290 | 12,316,271 | 13,603,945 | 12,226,463 | 10,452,157 |
| 19 Fuel Expense - Danskin | \$ | 795,176 | 523,859 | 980,515 | 1,848,884 | 2,764,934 | 2,525,520 | 651,098 |
| 20 Fuel Expense - Bennett Mountain | \$ | 345,664 | 192 | 292,746 | 61,966 | 1,245,723 | 68,538 | 21,307 |
| 21 Non-Firm Purchases | \$ | 8,746,377 | 15,471,139 | 9,038,922 | 24,467,254 | 21,546,747 | 10,351,039 | 8,032,251 |
| 22 Telocaset Wind Power Partners | \$ | 722,694 | 840,326 | 1,172,124 | 1,615,081 | 1,238,395 | 722,368 | 1,156,550 |
| 23 Raft River 90\% | \$ | 9,927 | 20,317 | 0 | - | 0 | 23,424 | 34,159 |
| 24 Third Party Transmission | \$ |  |  |  |  |  |  |  |
| 25 Surplus Sales | \$ | (8,677,754) | $(8,438,165)$ | $(5,257,208)$ | $(8,082,568)$ | $(9,669,473)$ | $(13,698,132)$ | (8,694,596) |
| 26 Expense Adjustment | \$ | $(604,008)$ | ( $3,414,866$ ) | $(1,432,271)$ | $(1,986,079)$ | $(1,273,978)$ | $(650,599)$ | 487,816 |
| 27 Sub-Total | \$ | 9,195,968 | 13,480,511 | 14,033,679 | 30,273,387 | 30,566,726 | 12,722,162 | 12,189,529 |
| 28 - |  |  |  |  |  |  |  |  |
| 29 BASE: |  |  |  |  |  |  |  |  |
| 30 Fuel Expense - Coal | \$ | 5,895,851 | 5,895,851 | 9,956,571 | 9,956,571 | 9,956,571 | 9,956,571 | 9,956,571 |
| 31 Fuel Expense - Danskin | \$ | 201,811 | 201,811 | 532,587 | 532,587 | 532,587 | 532,587 | 532,587 |
| 32 Fuel Expense - Bennett Mountain | \$ | 91,967 | 91,967 | 661,799 | 661,799 | 661,799 | 661,799 | 661,799 |
| 33 Third Party Transmission | \$ |  |  |  |  |  |  |  |
| 34 Non-Firm Purchases | \$ | 729,244 | 729,244 | 3,797,607 | 3,797,607 | 3,797,607 | 3,797,607 | 3,797,607 |
| 35 Surplus Sales | \$ | $(3,994,247)$ | $(3,994,247)$ | $(12,252,659)$ | (12,252,659) | $(12,252,659)$ | $(12,252,659)$ | (12,252,659) |
| 36 Cloud Seeding Expense | \$ | 62,270 | 62,270 | 74,340 | 74,340 | 74,340 | 74,340 | 74,340 |
| 37 Cloud Seeding Benefit | \$ | $(117,779)$ | $(117,779)$ | $(118,945)$ | $(118,945)$ | $(118,945)$ | $(118,945)$ | $(118,945)$ |
| 38 Sub-Total | \$ | 2,869,118 | 2,869,118 | 2,651,300 | 2,651,300 | 2,651,300 | 2,651,300 | 2,651,300 |
| 39 |  |  |  |  |  |  |  |  |
| 40 Change From Base | \$ | 6,326,849 | 10,611,393 | 11,382,379 | 27,622,087 | 27,915,426 | 10,070,862 | 9,538,229 |
| 41 Emission Allowance Sales Credit | \$ | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 42 Sub-Total | \$ | 6,326,849 | 10,611,393 | 11,382,379 | 27,622,087 | 27,915,426 | 10,070,862 | 9,538,229 |
| 43 |  |  |  |  |  |  |  |  |
| 44 Deferral (Shared and Allocated) | \$ | 5,392,374 | 9,044,090 | 9,701,202 | 23,542,305 | 23,792,317 | 8,583,396 | 8,129,432 |
| $45$ |  |  |  |  |  |  |  |  |
| 46 OF Deferral |  |  |  |  |  |  |  |  |
| 47 Actual (includes Net Metering) | \$ | 2,265,467 | 4,220,848 | 6,252,968 | 7,018,593 | 6,117,259 | 4,459,879 | 3,415,233 |
| 48 Raft River 100\% | \$ | 264,768 | 317,768 | 398,539 | 406,222 | 488,600 | 398,661 | 411,525 |
| 49 Base | \$ | 7,756,719 | 7,756,719 | 7,756,719 | 7,756,719 | 7,756,719 | 7,756,719 | 7,756,719 |
| 50 |  |  |  |  |  |  |  |  |
| 51 Change From Base | \$ | (5,226,485) | $(3,218,104)$ | $(1,105,212)$ | $(331,905)$ | (1,150,860) | $(2,898,179)$ | (3,929,962) |
| 52 Deferral (Allocated) | \$ | $(4,949,481)$ | $(3,047,544)$ | $(1,046,636)$ | $(314,314)$ | $(1,089,865)$ | $(2,744,576)$ | $(3,721,674)$ |
| 53 |  |  |  |  |  |  |  |  |
| 54 Total Deferral ( $-6+41+48$ ) | \$ | (1,375,408) | 4,153,207 | 8,654,566 | 23,227,991 | 22,702,453 | 5,838,820 | 4,407,759 |
| 55 Principal Balances |  |  |  |  |  |  |  |  |
| 56 Principal Balances |  |  |  |  |  |  |  |  |
| 57 Beginning Balance | \$ | 0 | $(1,375,408)$ | 2,777,799 | 11,432,365 | 34,660,356 | 57,362,809 | 63,201,629 |
| 58 Amount Deferred | \$ | $(1,375,408)$ | 4,153,207 | 8,654,566 | 23,227,991 | 22,702,453 | 5,838,820 | 4,407,759 |
| 59 Ending Balan | \$ | (1,375,408) | 2777799 | 1,432,365 | 34,660,356 | 57,362,809 | 6,201,629 | 7,609,387 |

60
61 Interest Balances

| 62 Accrual thru Prior Month | \$ | 0 | 440 | $(5,233)$ | $(44,371)$ | 3,440 | 147,929 | 389,780 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 63 Interest @ 5\% per Year | \$ | 0 | $(5,731)$ | 11,574 | 47,635 | 144,418 | 239,012 | 263,340 |
| 64 Prior Month's Interest Adj. | \$ | 440 | 58 | $(50,713)$ | 176 | 71 | 2,840 | (32) |
| 65 Total Current Month Interest | \$ | 440 | $(5,672)$ | $(39,139)$ | 47,811 | 144,489 | 241,852 | 263,308 |
| 66 Interest Accrued to Date | \$ | 440 | $(5,233)$ | $(44,371)$ | 3,440 | 147,929 | 389,780 | 653,088 |
| 67 Balance (True-Up \& Interest) | \$ | $(1,374,968)$ | 2,772,567 | 11,387,994 | 34,663,796 | 57,510,737 | 63,591,409 | 68,262,476 |
| 68 |  |  |  |  |  |  |  |  |
| 69 True-Up of the True-Up |  |  |  |  |  |  |  |  |
| 70 True-Up Revenues (Collections) | \$ | 529,379 | 554,444 | 3,944,458 | 11,411,725 | 11,485,090 | 10,337,799 | 8,225,629 |
| 71 |  |  |  |  |  |  |  |  |
| 72 Beginning Balance | \$ | 4,862,487 | 118,992,270 | 112,443,347 | 102,436,843 | 91,451,939 | 80,347,898 | 70,344,882 |
| 73 Adjustments: |  |  |  |  |  |  |  |  |
| 74 2007-08 PCA Transfer - ON 30563 | \$ | 124,101,211 | 0 | 0 | 0 | 0 | 0 | 0 |
| 75 Emmission Allowance - ON 30529 | \$ | $(9,937,989)$ | 0 | $(6,503,462)$ | 0 | 0 | 0 | 0 |
| 76 Correction for Change in Base | \$ | 0 | $(6,463,350)$ | - 0 | 0 | 0 | 0 | 0 |
| 77 Sub-Total | \$ | 119,025,709 | 112,528,920 | 105,939,886 | 102,436,843 | 91,451,939 | 80,347,898 | 70,344,882 |
| 78 Interest @ 5\% per Year | \$ | 495,940 | 468,871 | 441,416 | 426,820 | 381,050 | 334,783 | 293,104 |
| 79 Revenue Applied to Interest | \$ | 495,940 | 468,871 | 441,416 | 426,820 | 381,050 | 334,783 | 293,104 |
| 80 Revenue Applied to Balance | \$ | 33,439 | 85,573 | 3,503,042 | 10,984,905 | 11,104,041 | 10,003,016 | 7,932,525 |
| 81 True-Up of the True-Up Balance | \$ | 118,992,270 | 112,443,347 | 102,436,843 | 91,451,939 | 80,347,898 | 70,344,882 | 62,412,357. |

[^0]83 Note: Negative amounts indicate benefit to ratepayers

## TRUE-UP CALCULATIONS FOR 2008-2009 FOR <br> IDAHO POWER COMPANY PCA CASE NO. IPC-E-09-11


Division of Power Costs
IPC-E-09-11
Company Case

| Description | Initial | Allocated | Shared | Idaho Customer | Idaho |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amount | to Other | with | Revenue | PCA |
|  |  | Jurisdictions | Shareholders | Requirement | Rates |
|  | $(\$)$ | $(\$)$ | $(\$)$ | $(\$)$ | $(\phi / \mathbf{k W h})$ |


| Forecast (2009-2010) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Non-QF Power Supply Cost Difference QF Power Supply Cost Difference | $\begin{gathered} 99,057,941 \\ (11502 \end{gathered}$ | $\begin{gathered} 5,160,919 \\ (599,268) \end{gathered}$ | 4,694,851 | $\begin{gathered} 89,202,171 \\ (10,903,001) \end{gathered}$ |  |
| Sub-Total | 87,555,672 | 4,561,651 | 4,694,851 | 78,299,170 | 0.5662 |
| True Up (2008-2009) |  |  |  |  |  |
| Revenue from Forecast Rate | $(3,661,640)$ |  |  | $(3,661,640)$ |  |
| Non-QF Power Supply Cost Difference | 171,368,733 | 9,077,060 | 15,940,420 | 146,351,253 |  |
| Load Growth Adjustment | $(4,118,482)$ | $(220,156)$ | $(488,655)$ | $(3,409,671)$ |  |
| QF Power Supply Cost Difference | $(35,815,180)$ | $(1,893,982)$ | 0 | ( $33,921,198$ ) |  |
| Interest During Deferral Period | 2,533,025 |  |  | 2,533,025 |  |
| Sub-Total | 130,306,456 | 6,962,922 | 15,451,766 | 107,891,769 |  |
| Emission Allowance Credit (IPC-E-09-08) | $(4,591,632)$ |  |  | $(4,591,632)$ |  |
| Sub-Total | 125,714,824 | 6,962,922 | 15,451,766 | 103,300,137 | 0.7465 |
| True Up of the True Up |  |  |  |  |  |
| Amount Carried Forward | 4,862,487 |  |  | 4,862,487 |  |
| Other Limited Term Adjustments: |  |  |  |  |  |
| 2007-08 PCA Transfer - ON 30563 | 124,101,211 |  |  | 124,101,211 |  |
| Emmission Allowance - ON 30529 | $(16,441,450)$ |  |  | $(16,441,450)$ |  |
| Correction for Change in Base | $(6,463,350)$ |  |  | $(6,463,350)$ |  |
| Interest During Amortization | 3,811,355 |  |  | 3,811,355 |  |
| Collections from True Up Rate | $(87,866,917)$ |  |  | $(87,866,917)$ |  |
| Sub-Total | 22,003,335 | 0 | 0 | 22,003,335 | 0.1590 |
| Total Power Cost Adjustment (PCA) | 235,273,832 | 11,524,572 | 20,146,617 | 203,602,642 | 1.4717 |

Total Power Cost Adjustment (PCA)
Division of Power Costs
IPC-E-09-11
Company Case

[^1]Revenue from Forecast Rate Non-QF Power Supply Cost Difference
Load Growth Adjustment QF Power Supply Cost Difference Interest During Deferral Period
True Up of the True Up Other Limited Term Adju 2007-08 PCA Transfer - ON 30563 Emmission Allowance - ON 305 Correction for Change in Base
Collections from True Up Rate
Sub-Total
235,273,832
True Up (2008-2009)
Emission Allowance Credit (IPC-E-09-08) Sub-Total -
Division of Power Costs

| Description | Initial | Allocated | Shared | Idaho Customer | Idaho |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Amount | to Other | with | Revenue | PCA |
|  |  | Jurisdictions | Shareholders | Requirement | Rates |
|  | $(\$)$ | $(\$)$ | $(\$)$ | $(\$)$ | ( $\phi / \mathrm{kWh})$ |

Forecast (2009-2010)
Non-QF Power Supply Cost Difference
QF Power Supply Cost Difference
Sub-Total
True Up (2008-2009)
True Up of the True Up Amount Carried Forward Other Limited Term Adjustments: 2007-08 PCA Transfer - ON 30563 Emmission Allowance - ON 30529 Correction for Change in Base
Interest During Amortization
Collections from True Up Rate
Total Power Cost Adjustment (PCA)

| （1） | （2） | （3） | （4） | （5） | （6） | （7） | （8） |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Rate | 2008 Avg． | 2008 Sales | 04／01／09 | 06／01／09 |  |  |  |
| Sch． No． | Number of Customers | Normalized （kWh） | Base Revenue | PCA <br> Adjustment | Total Revenue | Average $\not \subset / \mathrm{kWh}$ | Percent Change |
| 1 | 391，376 | 5，062，831，148 | 327，482，769 | 58，495，951 | 385，978，720 | 7.624 | 17．86\％ |
| 4 | 62 | 965，866 | 61，481 | 11，160 | 72，641 | 7.521 | 18．15\％ |
| 5 | 87 | 1，289，934 | 82，243 | 14，904 | 97，147 | 7.531 | 18．12\％ |
| 7 | 31，171 | 190，586，226 | 15，488，243 | 2，202，033 | 17，690，276 | 9.282 | 14．22\％ |
| 9 | 26，848 | 3，601，578，430 | 163，765，134 | 41，612，637 | 205，377，771 | 5.702 | 25．41\％ |
| 15 | － | 5，957，094 | 1，004，323 | 68，828 | 1，073，151 | 18.015 | 6．85\％ |
| 19 | 111 | 2，123，608，415 | 74，487，285 | 24，536，172 | 99，023，457 | 4.663 | 32．94\％ |
| 24 | 15，484 | 1，551，322，661 | 81，668，256 | 17，923，982 | 99，592，238 | 6.420 | 21．95\％ |
| 39 | 0 | 0 | 0 | 0 | 0 | 0.000 | 0．00\％ |
| 40 | 1，855 | 16，739，169 | 966，323 | 193，404 | 1，159，727 | 6.928 | 20．01\％ |
| 41 | 140 | 22，084，297 | 2，314，258 | 255，162 | 2，569，420 | 11.635 | 11．03\％ |
| 42 | $\underline{220}$ | 4，207，305 | 164，514 | 48，611 | 213，125 | $\underline{5.066}$ | 29．55\％ |
|  | 467，354 | 12，581，170，545 | 667，484，829 | 145，362，844 | 812，847，673 | 6.461 | 21．78\％ |
| 26 | 1 | 703，404，640 | 21，204，238 | 8，127，137 | 29，331，375 | 4.170 | 38．33\％ |
| 29 | 1 | 189，569，677 | 5，319，281 | 2，190，288 | 7，509，569 | 3.961 | 41．18\％ |
| 30 | 1 | 215，000，001 | 6，177，935 | $\underline{2,484,110}$ | 8，662，045 | 4.029 | 40．21\％ |
|  | 3 | 1，107，974，318 | 32，701，454 | 12，801，535 | 45，502，989 | 4.107 | 39．15\％ |
|  | 467，357 | 13，689，144，863 | 700，186，283 | 158，164，379 | 858，350，662 | 6.270 | 22．59\％ |


IPC－E－09－11
Idaho Power Company
Summary of Revenue Impact
State of Idaho
Normalized 12－Months Ending December 31， 2008
STAFF CASE
Base Rates to 6／1／09 PCA


| $38.33 \%$ |
| :--- |
| $41.18 \%$ |
| $40.21 \%$ |
| $39.15 \%$ |

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$\underline{2,484,110}$
$12,801,535$



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2008 Sales
 （kWh）


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 $703,404,640$
$189,569,677$
$\underline{215,000,001}$
$1,107,974,318$


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| $\stackrel{\oplus}{\stackrel{1}{3}} \text { 인 }$ |  |  | $\infty$ <br> Attachment G Case No．IPC－E－09－11 <br> Staff Comments 05／14／09 Page 2 of 2 |

## CERTIFICATE OF SERVICE

# I HEREBY CERTIFY THAT I HAVE THIS $14{ }^{\text {TH }}$ DAY OF MAY 2009, SERVED THE FOREGOING COMMENTS OF THE COMMISSION STAFF, IN CASE NO. IPC-E-09-11 BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING: 

DONOVAN E WALKER
BARTON L KLINE
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: dwalker@idahopower.com
bkline@idahopower.com

SCOTT WRIGHT
GREGORY W SAID
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: swright@idahopower.com gsaid@idahopower.com



[^0]:    ttachment $E$
    Case No. IPC-E-09-11

[^1]:    Forecast (2009-2010)
    Non-QF Power Supply Cost Difference
    QF Power Supply Cost Difference
    Sub-Total Forecast (2009-2010)
    Non-QF Power Supply Cost Difference
    QF Power Supply Cost Difference
    Sub-Total Forecast (2009-2010)
    Non-QF Power Supply Cost Difference
    QF Power Supply Cost Difference
    Sub-Total

