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UTILITIES COMMISSION

BARTON L. KLINE
Lead Counsel

April 24, 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-09-13
*IN THE MATTER OF IDAHO POWER COMPANY'S PETITION FOR
MODIFICATION OF THE FILING DATE FOR ITS 2009 INTEGRATED
RESOURCE PLAN ("IRP")*

Dear Ms. Jewell:

Enclosed please find for filing an original and seven (7) copies of Idaho Power's Petition in the above matter.

I would appreciate it if you would return a stamped copy of this letter for my file in the enclosed stamped, self-addressed envelope.

Very truly yours,

Barton L. Kline

BLK:csb
Enclosures

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S PETITION FOR) CASE NO. IPC-E-09-13
MODIFICATION OF THE FILING DATE)
FOR ITS 2009 INTEGRATED RESOURCE) PETITION
PLAN ("IRP").)
_____)

COMES NOW, Idaho Power Company ("Idaho Power" or the "Company") in accordance with RP 053, hereby requests that the Idaho Public Utilities Commission ("Commission") issues its order modifying Order No. 30317 issued on May 23, 2007, in Case No. IPC-E-06-24, in which the Commission directed Idaho Power to file its "next full IRP no later than the last business day of June 2009." (Order No. 30317, p. 2.) Idaho Power requests that the Commission modify the filing date for the 2009 IRP from the last business day of June 2009 to the last business day of December 2009. This Petition is based on the following:

I. BACKGROUND

1. In Order No. 30317, the Commission reviewed the Integrated Resource Plan ("IRP") filing dates for its jurisdictional electric utilities, Idaho Power, Rocky Mountain Energy, and Avista Energy and concluded it would be in the public interest if Idaho Power filed its biannual IRP no later than the last business day of June 2009.

2. The Commission further ordered that the Company provide the Commission a transitional IRP update in June of 2008. The 2008 IRP update would address the progress of the Company's short-term action plan; any changes in load forecast, existing loads, customer base, and purchase power contracts; and any significant deviations from its 2006 IRP.

3. Idaho Power filed its 2008 IRP Update in June of 2008.

4. Since the completion of the 2008 Update, several major events have occurred that make it desirable to delay the filing date of the 2009 IRP until the end of 2009 to allow the Company to include the following in the 2009 IRP:

a. Recent permitting delays have pushed completion of the Boardman to Hemingway 500 kV transmission project beyond 2012, as stated in Idaho Power's 2008 IRP Update. With this delay, the Company plans to treat the Boardman to Hemingway project as an uncommitted resource in the 2009 IRP. As an uncommitted resource, the 2009 IRP will address whether the Boardman to Hemingway project continues to merit inclusion in the Company's near-term resource action plan; and

b. Substantial changes in economic conditions have occurred since September of 2008 when the load forecast currently being used for the 2009 IRP was completed. Slowed local and national economic growth may impact the future growth of

Idaho Power's customers' electric loads and the Company believes it would be prudent to update the sales and load forecast prior to completing the 2009 IRP. Idaho Power expects to complete the new sales and load forecast in August 2009.

II. BOARDMAN TO HEMINGWAY PROJECT

5. Idaho Power has discussed possible upgrades to the transmission paths linking the Company's load center to the regional energy market in the Pacific Northwest in its IRP filings for at least 10 years. Idaho Power discussed potential Idaho to Pacific Northwest transmission upgrades in general terms in both the 2000 and 2002 IRPs and identified the 225 MW McNary to Boise transmission project in its preferred resource portfolio in the 2006 Integrated Resource Plan. In the 2006 IRP, Idaho Power identified the 225 MW McNary to Boise transmission project as part of the Company's 20-year resource plan with a projected completion date of 2012. The IPUC acknowledged Idaho Power's 2006 Integrated Resource Plan in Order No. 30281 in March 2007. The Oregon PUC acknowledged Idaho Power's 2006 Integrated Resource Plan in Order No. 07-394.

6. Since acknowledgement of the 2006 IRP, Idaho Power has refined and finalized plans for the Idaho-Pacific Northwest transmission upgrades. Idaho Power is now proposing to construct and operate a new 300 mile long single circuit 500 kV electric transmission line between a new switching yard at the Boardman power plant near Boardman, Morrow County, Oregon, to the new Hemingway substation, to be located in Owyhee County, Idaho. Collectively these facilities are identified as the Boardman to Hemingway project or the B2H project.

7. The Commission is well aware of the fact that there has been substantial opposition in both Idaho and Oregon to potential routes for the B2H project. To respond to the concerns of the Company's customers and others regarding how the construction of the line might impact their various communities, the Company has commenced a comprehensive and inclusive public process to identify proposed and alternative routes required for the B2H transmission line.

8. A Community Advisory Process ("CAP") has been established to develop routes for the Boardman to Hemingway project. This process will involve local citizens in the determination of line routes to submit to the Bureau of Land Management ("BLM") for its review consistent with the requirements of the National Environmental Policy Act ("NEPA") and to the Oregon Energy Facility Siting Council ("OEFSC") for its review under Oregon state law. The CAP membership will be determined through consultation with project stakeholders. Three local area Project Advisory Teams ("PAT") will be formed with representation from: private property owners, community groups, land use organizations, environmental organizations, and local, state, and federal government agencies. These teams will begin in May with the goal of developing acceptable routes by the end of 2009. Public open houses will be held allowing the team members to gather community concerns and provide updates on the process. The CAP members will develop routing criteria with Idaho Power. Then the members will apply these criteria to detailed maps and generate route options. Once the options are developed, the members will evaluate the route options against the agreed-upon criteria to determine the routes to take forward in the process.

9. Additionally, the CAP will include a Project Coordinating Team to bring together the criteria and routes of the three CAPs. They will gather the CAP routes and align them across the length of the project. Finally, these aligned routes will be submitted to the government siting processes described above.

10. As part of its review of the B2H siting process, the Company has decided to delay development of the Sand Hollow substation to serve the western Treasure Valley electrical load. This delay has resulted in the removal of the substation from the Boardman to Hemingway Project. Idaho Power will continue to monitor and forecast the western Treasure Valley load and recommend the timing for construction of a future substation in order to reliably meet customer electrical demands.

11. The Company recognizes that undertaking this extensive collaborative approach will cause a delay in the permitting process. Because the B2H line route traverses land in the state of Oregon, the line is subject to the jurisdiction of the OEFSC. The OEFSC allows an Oregon-regulated utility to submit an Oregon PUC determination that a particular energy resource is part of the utility's acknowledged IRP as evidence that the energy resource is needed. Therefore, the Oregon PUC acknowledgement of an integrated resource plan, including a full analysis of the Boardman to Hemingway project, is a critical path item in the process of obtaining permits for the B2H line. The Company has suspended its pending Oregon Energy Facility Siting Council permitting process to allow the project Community Advisory Process to complete its task.

12. The fact that the Oregon EFSC process will be delayed provides some additional time for the Company to examine the B2H project in its 2009 IRP as an

uncommitted resource subject to review for continued inclusion in the Company's near-term resource plan.

13. While Idaho Power believes that the transmission project from the Pacific Northwest to the Boise area load center has been a part of its acknowledged IRPs since the Company's 2000 and 2002 IRPs, the Company now has firmed up many of the details of the proposed Boardman to Hemingway project, including its updated size and transfer capabilities. To fully reflect the best available data concerning the B2H project in the resource planning process, the Company proposes to include the B2H project as a resource alternative and obtain acknowledgement of an IRP that specifically addresses the B2H project as currently configured.

III. INCLUSION OF THE NEW SALES AND LOAD FORECAST IN THE IRP

14. Idaho Power completes its annual, full-featured sales and load forecast in mid-August each year. Using that sales and load forecast, the Company prepares its biannual IRP or its biannual update to the previously acknowledged IRP. Numerous analyses and studies used to prepare the IRP documents use the load forecast as the starting point.

15. Unquestionably, the current recession has temporarily slowed economic growth and correspondingly affected Idaho Power's customers and their electric loads. Because Idaho Power will have completed a new load forecast in August 2009, the Company has concluded that the data from the August 2009 forecast should be considered in the development of the 2009 IRP.

16. As previously noted, the starting point for an IRP is the long-term forecast. Substituting the August 2009 load forecast for the August 2008 load forecast means

that much of the work that has already been done to bring the 2009 IRP to its nearly-completed status will need to be reviewed and reanalyzed. The inclusion of the B2H project as an uncommitted resource choice will also require re-performance of number of analyses. These are the principal reasons why Idaho Power needs more time to complete the 2009 IRP. The Company recognizes that a delay in the acknowledgement of its IRP will have a ripple impact on other activities the Company and the Commission undertakes; nevertheless, the Company believes that a 2009 IRP that takes a new look at the B2H project and includes the Company's 2009 load forecast justifies taking the additional time and expending the additional resources.

IV. DISCUSSION

17. The Commission should allow Idaho Power additional time to file its 2009 IRP because it will better serve the underlying purpose of the IRP process and better serve Idaho Power's customers. The IRP process allows the Commission to evaluate a utility's planned resources and ensure they are reasonable, cost effective, and necessary to ensure that Company customers receive adequate services at reasonable rates. The process also encourages substantial public participation in the plan preparation.

18. Here, good cause exists to allow the modification of the filing dates. The requested delay will allow additional public participation in the preparation of the plan as it relates to the B2H project. Additional time will also allow the Company to incorporate the most recent sales and load forecasts. Thus, allowing Idaho Power additional time to prepare and file its 2009 IRP benefits the Commission and Idaho Power customers because it will allow the Commission to evaluate the IRP based upon the most up-to-

date load projections and economic conditions. The additional time also benefits the public by allowing more participation in the planning process—one of the goals of the IRP process.

V. CONCLUSION

Based on the foregoing, Idaho Power respectfully requests that the Commission issue its Order modifying the filing date for the Company's 2009 Integrated Resource Plan from the last business day of June 2009 to the last business day of December 2009.

Respectfully submitted this 24th day of April 2009.



BARTON L. KLINE
Attorney for Idaho Power Company