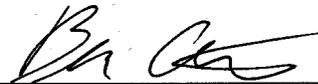


ICL also notes that the Staff in their Comments in this docket expressed concern that the Load Growth Adjustment Rate in the Power Cost Adjustment may allow Idaho Power to over recover forgone fixed costs. *Staff Comments* at 9. The Commission recently directed the Staff to hold a workshop for all three investor owned utilities to address the impact of the LGAR during period of declining load growth. *Order No. 31033* at 12, Case No PAC-E-10-01 (March 31, 2010). Just as in that case, here Idaho Power's FCA pilot program has revealed several ways in which the mechanism is operating differently than anticipated when originally instituted. To be sure, ICL recognizes the distinction between Power Cost Adjustments and Fixed Cost Adjustments. However, the issue identified by the Commission in Order No. 31033 is the same as the issue in the present docket – properly accounting for forgone fixed costs recovery caused by decreased volumetric sales. ICL submits the Commission should direct the Staff to hold a workshop to comprehensively address the issue of fixed costs recovery in times of declining retail sales. ICL believes this workshop is an important step towards making the FCA a permanent schedule.

Respectfully submitted this 9th day of April 2010,



Benjamin J. Otto
I.D. Bar # 8292

Attorney/Energy Associate
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of April, 2010 true and correct copies of the foregoing REPLY COMMENTS OF IDAHO CONSERVATION LEAGUE were delivered to the following persons via the method of service noted:

Hand delivery:

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Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
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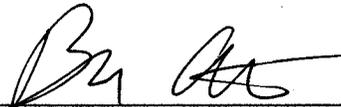
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