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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S 2009 INTEGRATED RESOURCE)	CASE NO. IPC-E-09-33
PLAN (IRP))	
)	COMMENTS OF THE
)	COMMISSION STAFF
)	

COMES NOW the Staff of the Idaho Public Utilities Commission (Commission), by and through its attorney of record, Scott Woodbury, Deputy Attorney General, and in response to the Notice of Filing and Notice of Comment Deadline issued in Order No. 30986 on January 22, 2010 in Case No. IPC-E-09-33, submits the following comments.

BACKGROUND

On December 28, 2009, Idaho Power Company (Idaho Power; Company) filed its 2009 electric Integrated Resource Plan (IRP) with the Commission. As required by Commission Order No. 22299 (Case No. U-1500-165), Idaho Power's filing is a biennial planning document that sets forth how the Company intends to serve the electric requirements of its customers.¹

¹ The normal filing date for Idaho Power's biennial IRP would have been June 2008. However, in Order No. 30281, the Commission expressed a desire to receive the IRPs from each of its three jurisdictional electric utilities within a narrower time frame. In response to that, Idaho Power proposed that it file its next "full" IRP in June 2009. The Commission accepted that proposed schedule on May 23, 2007, in Order No. 30317. However, the desire to provide additional information on the proposed Boardman to Hemingway 500 kV transmission line (B2H) caused Idaho

The complete 2009 IRP consists of four separate documents: (1) the 2009 Integrated Resource Plan; (2) Appendix A – Sales and Load Forecast; (3) Appendix B – Demand-Side Management 2008 Annual Report; and (4) Appendix C – Technical Appendix.

STAFF REVIEW

Planning Overview

Idaho Power's 2009 IRP addresses available supply-side and demand-side resource options, planning period, load forecast, potential resource portfolios, a risk analysis, and near-term and long-term action plans. Idaho Power assumes that during two 10-year planning periods, 2010-2019 and 2020-2029, it will continue to operate as a vertically-integrated electric utility while acquiring resources sufficient to serve all of its retail customers in its Idaho and Oregon service territories. The 2009 IRP is the first filing that bifurcates the planning period into two distinct segments. The Company contends that this approach "prevents near-term resource decisions from being influenced by the availability of resources that are dependent on technological advancements in the second 10 years." 2009 IRP, p. 3.

Four resource portfolios were modeled for the first ten-year period. Included in this planning period are certain resources the Company considers as "committed."² 2009 also marks the first time in a number of years that an upgrade of the Shoshone Falls hydroelectric facility is not identified as a committed resource, reflecting the uncertainty surrounding provisions in the FERC relicensing amendment. Two of the portfolios reviewed include the Boardman to Hemingway (B2H) transmission project, currently slated for completion in 2015. Completion of B2H would provide Idaho Power with nearly 850 MW of additional import capacity from the Pacific Northwest. B2H is not considered a committed resource as permitting delays, specifically regarding siting through Eastern Oregon, have pushed back the completion date from its original online target. Inclusion of the B2H transmission line in the Company's portfolios permits continued assessment of B2H as a cost-effective endeavor in the near-term.

Five resource portfolios were analyzed for the 2020-2029 time period. Each portfolio was designed to meet a potential federal renewable electricity standard (RES) as proposed in the

Power to request permission to file the 2009 IRP by year end 2009. The Commission granted Idaho Power's request for delay to year end on May 19, 2009, in Order No. 30815.

² Each portfolio contained 150 MW of wind resources, 2-20 MW blocks of geothermal resources, and 300 MW associated with the Langley Gulch natural gas facility. The inclusion of these is based on pending contracts and the Commission's granting of a CPCN for the Langley Gulch project.

American Clean Energy and Security Act (ACES; Waxman-Markey bill), which was approved by the U.S. House of Representatives in June 2009, and is currently in consideration in the Senate. Several of the portfolios for this planning period evaluated advanced technologies, such as solar power tower, nuclear and integrated gasification combined-cycle (IGCC) facilities, as well as traditional natural gas and wind generation. The top performing portfolios from each time period based on cost and risk metrics provide the foundation for the Company's Action Plan.

Idaho Power identifies four primary goals in its planning process: (1) to identify sufficient resources to reliably serve the demand for energy within Idaho Power's service area throughout the 20-year planning period; (2) ensure that the portfolio of selected resources reasonably balances cost, risk, and environmental concerns; (3) give equal and balanced treatment to both supply-side resources and demand-side measures; and (4) involve the public in the planning process in a meaningful way. Staff believes that the 2009 IRP sufficiently accomplishes these four goals, as well as the guidelines set forth by the Commission.

Load Forecast

The 2009 IRP was prepared during a time filled with great uncertainty. Beyond the issues surrounding the B2H transmission project, the local and national economies have seen dramatic downward swings during the last two years. In Order No. 30815, the Commission approved an extension to the Company's IRP filing date, citing the benefits of incorporating the most current sales and load forecasts into the final document. Instead of relying on a forecast created in the summer of 2008, the final IRP was based on a more recent mid-2009 forecast.

While many believe the current financial crisis began in late 2007, much of the impact was not felt until September 2008. There is little consensus on the exact cause or causes of the recession, but the effects to Idaho Power are evident. Since the filing of the 2006 IRP, the State of Idaho has seen a near tripling of its unemployment rate to over 9% in late 2009, and stagnant to negative growth in labor force participation.³ For the years 2008 and 2009, real personal income dropped for Idahoans. Also, residential customer growth, as measured by new housing starts, is at a fraction of 2005 levels, while regional housing vacancies have climbed

³ Due to the way unemployment statistics are compiled, individuals who have given up searching for a job, are 'underemployed', or whose job search has extended beyond the four week window prior to the official employment survey distribution, are not considered 'unemployed'. This is considered 'hidden unemployment', and leads to the unemployment rate understating the true level of joblessness in Idaho.

precipitously in the same timeframe. As a result, Idaho Power witnessed an overall decrease in sales in 2009, a phenomenon that has not occurred in some time. Though the Company foresees a rebound in 2012, Staff believes each of these factors contributed to a significant decrease in forecasted sales for Idaho Power, especially in the near-term planning horizon.

In fact, not only did Idaho Power's 2009 load forecast show lower sales relative to the 2008 forecast, the 2009 IRP continues a trend of relatively lower sales forecasts compared to previous IRPs since the 2004 filing. The 2009 IRP projects a growth in annual average energy of 0.6% throughout the planning period, compared to an annual growth rate of 1.5% used in the 2006 IRP. This difference results in a decrease of over 400 average megawatts (aMW) between the two IRPs for the year 2025, the last comparable year. The peak-hour forecast in the 2009 IRP is nearly 30% lower than that of the 2006 IRP for comparable years. As a result, Idaho Power's average load is expected to increase by 13 aMW annually and summertime peak-hour loads are expected to increase by 53 MW (or at a 1.5% annual growth rate) annually through 2020-2029. Staff notes that for the first time, Idaho Power foresees consumers responding to expected price increases by reducing average usage over the planning horizon. Not only is it predicted that real electricity rates will rise at an average rate of 3.3% a year, a lower relative increase in natural gas prices may lead to advantageous fuel-switching opportunities to the extent customers have the ability. Offsetting a portion of the decline is the addition of large industrial loads, notably the Hoku Materials facility in Pocatello. Idaho Power estimates Hoku will require 74 aMW of energy each year and add 82 MW to peak demand by 2012.

Idaho Power's load forecasts also include savings from existing energy efficiency programs. Given the recent increased commitment to energy efficiency by the Company and favorable cost-benefit ratios due to rising costs of alternative resources, Staff believes the decrement to load attributed to these programs may factor into the reduced forecasted growth rates, especially for the industrial and irrigation classes.

Idaho Power continues to use 70th percentile water conditions and 70th percentile average load for energy planning. For peak-hour capacity planning, Idaho Power uses 90th percentile water conditions and 95th percentile peak-hour load. Under these planning criteria, and accounting for additional demand-side management (DSM) programs, Idaho Power expects to see substantial energy deficits in 2023 and beyond once committed resources are included in the analysis. Substantial peak-hour deficits are expected to occur in 2017 and grow significantly to over 1,800 MW in 2029 once committed resources are included in the analysis. Staff continues

to support the conservative planning criteria Idaho Power has utilized in its previous three IRPs, as it reflects a concerted effort to balance reasonable expectations of the future while planning for less than ideal load and generation scenarios.

The Company forecasts a significant increase in industrial load for 2011 and 2012, presumably reflecting the additional needs of the Hoku facility and an expected rebound in the regional economy. Beyond that, industrial load is projected to grow at rates well below 1% a year. The addition of large customers is difficult to predict, and unforeseen industrial relocation into Idaho Power's service territory could burden a system that is already constrained. Another scenario would be that the Company simply could not immediately serve the new load, causing lost opportunities to both Idaho Power and the Idaho economy in general. Staff does not propose a specific methodology for capturing the potential uneven additions of large load, but recommends the Company continue to investigate the impacts this may have in future IRPs.

Planning Environment

Aside from the current economic conditions, Idaho Power has taken into consideration the continuing realization that resource options will be constrained by imminent environmental regulations and climate change policies. Notably, Idaho Power initially constrained all potential portfolios to meet greenhouse gas (GHG) emission reductions and federal renewable electricity standards (RES) outlined in the Waxman-Markey bill. The Waxman-Markey bill proposes a cap-and-trade system for reducing GHG emissions below current levels, similar to the SO₂ trading system that has been in place for a number of years. The ACES Act also sets an RES that requires utilities to generate up to 20% of electricity supplied to customers from renewable resources, and allows for up to 25% of the RES requirement to be met by energy efficiency savings.

This is not the first IRP to address federal climate change regulation or RES requirements. Previously, Idaho Power has included a carbon adder, or carbon tax, as a cost of production in an effort to quantify the impact of regulation on fossil-fuel based generation. While the IRP does provide an analysis of a carbon tax, the portfolios were designed with a cap-and-trade system to curb GHG emissions in mind. Staff believes that this is an appropriate methodological change in the current political environment, and supports the Company's adjustment in its portfolio analysis. Staff does not agree with the Company's planning assumption that all generation from its coal-fired facilities will cease by the end of the planning

period. Realistically, generation from coal-fired resources may be substantially curbed through 2050, but given the country's dependence on coal, it is hard to fathom that these plants would be completely removed by 2029. As in the 1990s, Staff assumes that the market for pollution control devices and advances in carbon capture and sequestration technology will allow continued fossil-fuel use, albeit at reduced levels. Should that be the case, the long-term need for new resources may not be as great as that stated by the Company. Despite the differing opinions regarding the future of coal resources, Staff does not believe the current IRP needs to be modified on this issue. The impact manifests toward the end of the Company's planning horizon, and there will be a number of IRPs produced when federal regulation is more certain.

Beyond the potential for legislation at the Federal level, Staff acknowledges Idaho Power must also plan around regional issues. The state of Idaho has no laws governing greenhouse gas emissions or renewable portfolio standards. The 2007 Idaho Energy Plan, adopted by the Idaho Legislature, provided recommendations for maintaining access to reliable, low-cost energy in a sustainable, economically sound manner. Notable in the Energy Plan was the emphasis on cost-effective energy efficiency and renewable resources to meet the needs of Idaho consumers. While none of the recommendations bind Idaho Power in resource decisions, Staff believes the intent of the Legislature has been echoed by the Company's shareholders. In May of 2009, a majority of Idaho Power shareholders voted to ask the Company to adopt GHG-curbing policies. Idaho Power has since responded by approving guidelines to reduce GHG emissions by 10-15% by 2013.

The State of Oregon accounts for nearly 5% of the Company's system load. Oregon has been quite proactive in regard to climate change legislation. In 2007, Oregon Governor Ted Kulongoski signed into law House Bill 3543, a bill that directs the state to, among other things, reduce GHG emissions by 10% by 2020. Oregon Senate Bill 838 was signed into law in 2007, establishing renewable portfolio standards for electric producers. Idaho Power is also a participant in Oregon PUC Docket UM 1452, a state initiative to investigate a solar photovoltaic feed-in tariff pilot program initiative. This program may require Idaho Power to procure between 100 kW and 300 kW of solar capacity from qualifying retail customers. Given the small fraction of energy and capacity mandated, Staff does not believe the IRP planning environment is hampered or constrained by the Oregon requirements.

One recent development that will affect future resource planning concerns Idaho Power's share of the Boardman coal-fired facility. At the time the 2009 IRP was being prepared Portland

General Electric Co. (PGE), the majority owner of the Boardman plant, was planning to install emission control equipment to comply with Oregon's 2008 Regional Haze Plan. Doing so would allow the plant to continue operation through 2040. Since that time, PGE has changed its plans and has submitted a proposal to the Oregon Department of Environmental Quality to cease operations of the plant by 2020. Should the plan be approved, Idaho Power would lose its 60 MW share of baseload generating capacity from the Boardman plant. Staff believes there is ample time to address this unexpected loss in generation in the Company's next IRP.

Energy Efficiency and Demand-Side Management

In determining the load-resource balance, Idaho Power conducted an analysis of potential cost-effective energy efficiency and demand-side management (DSM) programs to be implemented during the planning horizon. While existing DSM savings are captured in the load forecasts, the Company utilized an updated DSM potential study performed by Nextant, Inc. to determine the potential savings associated with new and expanded offerings. Idaho Power also contracted with Quantec, LLC, to conduct a study of potential savings associated with implementing more stringent appliance efficiency standards in Idaho.

The Nextant study was originally prepared in 2007 and was updated in 2009 to facilitate utilizing the results in the IRP. The study demonstrated that there are significant opportunities for energy and peak savings in virtually all customer segments in Idaho Power's service territory. Surprisingly, the study did not recommend any new programs for the irrigation class. The Company contends that this is explained by the success of its Irrigation Energy Efficiency Rewards and Peak Rewards programs. The Company has included in resource planning the recently expanded Irrigation Peak Rewards Program. This has the potential to provide as much as 260 MW of peak reduction by 2012.

The Quantec study demonstrated that Idaho Power can cost effectively acquire 127 aMW of energy efficiency savings by 2029 through the adoption of several building code and appliance standards. For this to manifest, it is imperative that the Company work closely with a number of agencies at the state level to gain the necessary support. The Company's efforts in market transformation through its support of the Northwest Energy Efficiency Alliance (NEEA) have been well documented of late, and Staff continues to be encouraged by the collaborative nature Idaho Power has demonstrated recently regarding its DSM and energy efficiency programs.

Beyond the energy efficiency savings, Idaho Power has included a considerable expansion of its three demand response programs (the A/C Cool Credit, Irrigation Peak Rewards, and FlexPeak Management programs) in the 2009 IRP. In total, the three programs are expected to provide 367 MW of peak reduction by 2012. Coupled with the savings associated with the energy efficiency programs, Idaho Power projects it can reduce peak generation needs by over 400 MW by the end of the planning period. Staff believes that if the cost of new generation increases at the rate witnessed in recent years, expansion of DSM programs will continue to be a cost effective means to meet the future demands of Idaho Power customers.

Portfolio Design and Selection

Idaho Power examined nine resource portfolios and numerous permutations as part of preparing the 2009 IRP. Each portfolio was designed to not only meet peak and energy load requirements, but also to satisfy potential RES requirements as outlined in the Waxman-Markey bill. In order to capture the proposed cap-and-trade system, Idaho Power reduced output from its coal-fired facilities based on the number of allowances it expects to receive under the bill.

Portfolio selection, through necessity of bifurcating the planning period, was a multi-step process. The first-period portfolios were evaluated on total cost as well as operational and quantitative risk characteristics, as has been done in the past. The resulting preferred portfolio in the first 10-year planning period became the basis for designing portfolios for the second 10-year period. As Staff noted earlier, Idaho Power included a number of committed resources in each of the first-period portfolios. The initial portfolios for the first 10-year planning horizon are summarized below:

Year	1-1 Solar		1-2 Gas Peaker		1-3 Gas Peaker & B2H ¹		1-4 B2H	
	Resource	MW	Resource	MW	Resource	MW	Resource	MW
2012	Wind*	150	Wind*	150	Wind*	150	Wind*	150
	CCCT (Langley Gulch)*	300	CCCT (Langley Gulch)*	300	CCCT (Langley Gulch)*	300	CCCT (Langley Gulch)*	300
	Geothermal*	20	Geothermal*	20	Geothermal*	20	Geothermal*	20
2015	Shoshone Falls	49	Shoshone Falls	49	Shoshone Falls	49	Shoshone Falls	49
	SCCT (Large Aero)	200	SCCT (Frame Peaker)	170	B2H	250	B2H	250
2016	Geothermal*	20	Geothermal*	20	Geothermal*	20	Geothermal*	20
2017	Solar PT w/St	100	SCCT (Frame Peaker)	170	SCCT (Large Aero)	100	B2H	175
2019	Solar PT w/St	100			SCCT (Large Aero)	100		

¹ B2H-Boardman to Hemingway

*Committed Resource

Staff believes that while the number of initial portfolios modeled is somewhat scant in comparison to previous IRPs, this is adequate given the level of committed resources in the near-term. Staff notes that the B2H resource can be considered a proxy for market purchases (as well as the Company's investment participation), namely from the Pacific Northwest. Idaho Power continues to use the AURORA model to forecast market prices, along with portfolio cost estimates. Staff is concerned that the prices used for market purchases may be understated in light of potential carbon legislation. Purchases from the Northwest traditionally have been tied to natural gas generation, the resource that tends to be on the margin during peak periods. These facilities would not be immune to carbon legislation (both federally and regionally), and the market price would undoubtedly reflect the additional cost associated with fossil fuel-based generation. If the Company's price assumptions do not reflect this, Staff believes cost of market purchases, and transmission-related investment in general, may be understated in the IRP.

Following a risk analysis, Idaho Power selected Portfolio 1-4 (Boardman to Hemingway) as the preferred portfolio for the first 10-year planning period. Based on that decision, Idaho Power created a second set of portfolios for the 2020-2029 timeframe. The portfolios are shown below:

Year	2-1 Nuclear/Green		2-2 Gateway West		2-3 IGCC		2-4 Wind & Peakers		2-5 Limited Curtailment	
	Resource	MW	Resource	MW	Resource	MW	Resource	MW	Resource	MW
2020	Solar PT w/St	100					SCCT (Large Aero)	100		
2021	Wind	100	Wind	100					Wind	100
2022	Solar PT w/St	100	Gateway West	200	Solar PT w/St	100	Wind	100	SCCT (Large Aero)	100
2023	Nuclear	270								
2024	Geothermal	52			IGCC w/Seq.	600	SCCT (Large Aero)	200		
2025	Solar PT w/St	100	Gateway West	200			Gateway West	100		
2026			Wind	100			SCCT (Large Aero)	200	SCCT (Large Aero)	100
2027	Geothermal	52	Gateway West	400	Solar PT w/St	100	Wind	400	Wind	200
									SCCT (Large Aero)	100
2028	Nuclear	400	Gateway West	600	SCCT (Large Aero)	400	SCCT (Large Aero)	400		
2029	Gateway West	250			Solar PT w/St	100	SCCT (Large Aero)	500		

Staff believes that the Company's decision to separate the planning periods has facilitated the exploration of technologies previously considered immature or cost-prohibitive, such as concentrated solar generation and nuclear. It remains to be seen whether federal legislation will change the cost dynamics of large scale green generation, either through additional production and/or investment tax credits or accelerating the reduction in costs of production, and Staff is

uncertain to what extent the Company's analysis took this into account. Also of note, all but Portfolio 2-5 assumed generation from the Company's coal plants would be curtailed to zero by the end of the planning period. Idaho Power states that this is the primary rationale for adding additional resources in the second planning horizon. Again, while Staff considers eliminating current coal resources from the Company portfolio as planning to a worst case scenario, the rise of carbon legislation to the exclusion of coal generation could certainly make currently cost prohibitive resources more attractive.

Preferred Portfolio and Action Plan

After rigorous scrutiny, the Company opted for Portfolio 1-4 (Boardman to Hemingway) for the first 10-year planning period and Portfolio 2-4 (Wind and Peakers) for the last 10 years of the planning horizon as the preferred strategies. Period One includes completion of the Langley Gulch CCCT (300 MW) in 2012, the Shoshone Falls Upgrade Project (49 MW) in 2015, and assumes completion of the Boardman to Hemingway (B2H) Transmission Project in 2015. The portfolio selected for the second half of the plan represents a strategy of adding wind resources sufficient to provide energy and RECs along with simple-cycle natural gas plants to provide peaking capacity and operating reserves necessary to integrate wind generation. The additional wind (100 MW in 2022 and 400 MW in 2027) assumes completion of the Gateway West Transmission Project (100 MW) by 2022. The selected portfolio adds supply-side resources capable of providing 529 aMW of energy, 1,525 MW of capacity to peak-hour loads, and 425 MW of additional transmission capacity from the B2H line to the Pacific Northwest. The selected portfolio also includes new and expanded energy efficiency and demand-side management programs estimated to reduce average loads by 127 aMW and peak-hour loads by 438 MW by 2029.

Idaho Power further analyzed the impact of limited third-party interest in the B2H transmission line and limited coal curtailment through the use of alternative portfolios. Should the Company be unable to partner on the B2H line (or its share of the investment exceeds the next best alternative), its most likely preferred strategy would be Portfolio 1-2 (Gas Peakers), which involves an additional 340 MW of simple-cycle combustion turbine (SCCT) peakers in addition to the Langley Gulch plant. Staff is aware that Idaho Power and PacifiCorp have signed a Memorandum of Understanding (MOU) regarding the potential opportunities to partner on transmission projects that directly affect the B2H line. According to Idaho Power, the MOU

enables discussions between the two utilities to better utilize the existing transmission system as well as potential partnership on new facilities. Staff finds this encouraging as Idaho Power's involvement on the much talked-about Gateway West project may be contingent on completion of the B2H line. Also, the Company has recently made significant progress toward clearing the siting hurdles it has faced in Eastern Oregon.⁴

The scenario of limited curtailment in lieu of total curtailment was assessed using Portfolio 2-5 (Limited Curtailment). In this scenario, carbon emissions are reduced through 2020, and then left at that level through the remainder of the planning period. As the Waxman-Markey bill currently stands, carbon emissions would be reduced to 17% of 2005 levels by 2020, 42% by 2030, and 83% by 2050. Should the alternative scenario come to fruition, the Company would be investing in 1,400 MW less capital and transmission projects as compared to its preferred portfolio. The 2050 timeline for further reductions affords the Company the ability to monitor the maturation of new technology, and plan accordingly in the out years to responsibly reduce its carbon footprint.

In the near-term, Idaho Power has effectively pursued the actions supported by its preferred portfolio. The Company issued a Request of Proposal (RFP) for 150 MW of wind generation in May of 2009, and is finalizing its agreements with the selected developer. The Commission granted the Company a CPCN for Langley Gulch Power Plant in September of 2009. In accordance with the Action Plans in its 2004 and 2006 IRPs, Idaho Power issued two geothermal RFPs in 2006 and 2008. A contract to purchase the output from the 13 MW first phase of the Raft River project has been signed and the project has been generating since mid-2008. An agreement to purchase 22 MW of generation from the Neal Hot Springs Project in Oregon has been submitted for Commission approval. Given the speculative nature of finding feasible new sites for geothermal production, the Company believes it is best to negotiate contracts once sites are proven rather than pursue new projects through the traditional RFP process. The Company is currently waiting on FERC to approve an amended application that may dictate whether the Shoshone Falls Upgrade is feasible.

Idaho Power contends that maintaining a diverse resource portfolio is the best way to mitigate risk given the amount of uncertainty in the planning process. Staff believes that the 2009 IRP contains sufficient quantitative and qualitative analyses of the potential risk associated

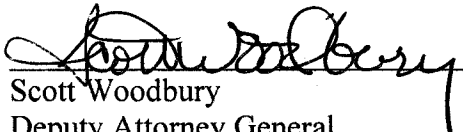
⁴ According to the Company, as of early April 2010, it will soon submit its proposed route for B2H to the Oregon Bureau of Land Management and Oregon Energy Facility Siting Council.

with carbon regulation, developing technologies, resource siting, and relying on market purchases. Although the IRP is not intended to be a binding document for the Company's actions, Staff notes that the 2009 IRP is unique relative to previous IRPs given the level of resources the Company is actively pursuing in the near term. Based on its analysis, Staff believes that Idaho Power's 2009 IRP satisfies the expectations and requirements of the Commission Order Nos. 25260 and 22299.

STAFF RECOMMENDATION

Upon review of Idaho Power Company's 2009 IRP, Staff believes the Company has performed extensive analyses, given equivalent consideration of supply- and demand-side resources, and provided acceptable opportunities for public input, resulting in an integrated resource plan representative of the Commission's directives. Staff, therefore, recommends that the Commission acknowledge the Company's 2009 IRP.

Respectfully submitted this 15th day of April 2010.


Scott Woodbury
Deputy Attorney General

Technical Staff: Rick Sterling
Bryan Lanspery

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15TH DAY OF APRIL 2010, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-09-33, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE