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IDAHO PUBLIC
UTILITIES COMMISSION

March 28, 2012

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: IPC-E-11-23 – Kootenai Electric Cooperative, Inc.'s Letter Filing

Dear Ms. Jewell:

I write on behalf of Kootenai Electric Cooperative, Inc. ("Kootenai"), and request acceptance of this letter filing in the above captioned docket in light of Idaho Power Company's letter filed yesterday and other recent events. Although this case has been fully submitted under the Idaho Public Utilities Commission's ("IPUC") modified procedure rules, Kootenai makes this filing pursuant to IPUC Rule of Procedure 66.

Idaho Power filed its letter filing yesterday to correct its pleadings' incorrect assertion that Idaho Power owns the meter at Avista's Lolo Substation. Idaho Power had previously asserted that it owned the meter at the Lolo Substation in Idaho in support of Idaho Power's claim that the point of delivery between the two utilities is not at Imnaha, Oregon, but rather at the Lolo Substation. Idaho Power appears to have recognized that it does not own the meter while responding to discovery requests filed by Kootenai in the ongoing complaint proceeding before the Public Utility Commission of Oregon. Kootenai appreciates the corrective filing by Idaho Power.

But Kootenai disagrees with Idaho Power's continued characterization in its letter filing that the point of delivery for a transfer from Avista to Idaho Power at this location occurs at the LoLo Substation. There is no evidence in the record before the IPUC – such as an interconnection agreement between Idaho Power and Avista – to support Idaho Power's assertion, and Kootenai provided the IPUC with the limited publicly available evidence it was able to obtain to the contrary.

Discovery is ongoing in the Oregon proceeding. In light of Idaho Power's recent revelation acknowledging that it does not own the meter, Kootenai submits that it would be premature for the IPUC to rule on this matter without the benefit of the evidence that has been and likely will be uncovered through discovery in the Oregon proceeding.

Idaho Public Utilities Commission

March 28, 2012

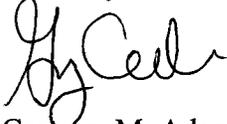
IPC-E-11-23

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Kootenai submits that other relevant information has come forth with regard to the point of delivery for a transfer from Avista to Idaho Power occurring over the Lolo-Oxbow 230 kilovolt line interconnecting the two utilities. Rather than supplement the record at this time, Kootenai suggests that doing so at the close of discovery in the Oregon proceeding would make more sense.

For the reasons stated above, Kootenai respectfully requests that the Idaho Public Utilities Commission not rule on this matter without providing the parties the opportunity to supplement the record with materials that may be obtained in discovery in the Oregon proceeding.

Sincerely,

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

Gregory M. Adams

Richardson & O'Leary PLLC

Attorney for Kootenai Electric Cooperative, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of March, 2012, a true and correct copy of the within and foregoing **KOOTENAI'S LETTER FILING** was served as shown to:

Jean Jewell
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

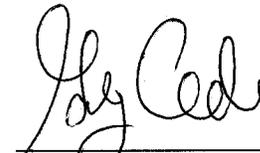
Kris Sasser
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

Donovan Walker
Jason Williams
Idaho Power Company
1221 West Idaho Street
Boise, ID 83702

Hand Delivery
 U.S. Mail, postage pre-paid
 Facsimile
 Electronic Mail

By:



Gregory M. Adams