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IDAHO PUBLIC  
UTILITIES COMMISSION

**LISA D. NORDSTROM**  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

June 18, 2013

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. IPC-E-13-09  
Glanbia Foods, Inc.'s Petition – Replacement Page 13 to Idaho Power  
Company's Reply Comments

Dear Ms. Jewell:

It has come to Idaho Power Company's ("Idaho Power") attention that page 13 of its Reply Comments contained page numbers in its footnotes that cited to pre-filed testimony rather than the transcript. To correct this oversight, Idaho Power requests that the original page 13 of its Reply Comments be replaced with the enclosed page 13. To that end, enclosed are an original and seven (7) copies of replacement page 13.

If you have any questions regarding this error or the enclosed replacement page, please do not hesitate to contact the undersigned.

Sincerely,

Lisa D. Nordstrom

LDN:csb  
Enclosures  
cc: Service List

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 18<sup>th</sup> day of June 2013 I served a true and correct copy of IDAHO POWER COMPANY'S LETTER TO JEAN D. JEWELL DATED JUNE 18, 2013, AND REPLACEMENT PAGE 13 TO IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

### **Commission Staff**

Weldon Stutzman  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 West Washington (83702)  
P.O. Box 83720  
Boise, Idaho 83720-0074

Hand Delivered  
 U.S. Mail  
 Overnight Mail  
 FAX  
 Email [Weldon.Stutzman@puc.idaho.gov](mailto:Weldon.Stutzman@puc.idaho.gov)

### **Glanbia Foods, Inc.**

Peter J. Richardson  
Gregory M. Adams  
RICHARDSON & O'LEARY, PLLC  
515 North 27<sup>th</sup> Street (83702)  
P.O. Box 7218  
Boise, Idaho 83707

Hand Delivered  
 U.S. Mail  
 Overnight Mail  
 FAX  
 Email [peter@richardsonandoleary.com](mailto:peter@richardsonandoleary.com)  
[greg@richardsonandoleary.com](mailto:greg@richardsonandoleary.com)

  
Christa Beary, Legal Assistant

substation.”<sup>24</sup> Mr. Sterling testified that Idaho Power had not violated any of its rules or its tariff when it required the proposed Schedule 19 customer to fund a portion of the substation and, in fact, Mr. Sterling noted:

Customers could request service and possibly trigger construction of new facilities to serve the ultimate maximum load expected, and face no consequences if only a part of the load (and revenue that goes along with it) materialized . . . . I believe that the risk of speculative development should be on the customer requesting service, not on Idaho Power.<sup>25</sup>

In his testimony, Mr. Sterling also stated that the treatment of Schedule 19 customers was “inconsistent and discriminatory,”<sup>26</sup> because “it is discriminatory whenever one customer has to pay for substation facilities and another customer, who may require the same or even larger substation capacity, does not have to pay just because extra substation capacity is already available.”<sup>27</sup> On Rebuttal, Company witness Mr. Said responded to Mr. Sterling’s statement by pointing out that:

A new customer who requires no additional facilities provides a benefit to other Idaho Power customers in that no additional costs are added to the system, but the existing costs can be spread across a greater load, thereby effectively reducing the cost responsibility of other customers . . . . Conversely, a new customer who requires additional facilities, but is not required to make a CIAC, adds total costs to be recovered by the Company. Those additional costs adversely impact existing customers, since those customers must absorb those additional costs.<sup>28</sup>

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<sup>24</sup> Case No. IPC-E-00-12, Sterling Direct Testimony, Tr. at 131.

<sup>25</sup> Case No. IPC-E-00-12, Sterling Direct Testimony, Tr. at 137.

<sup>26</sup> Case No. IPC-E-00-12, Sterling Direct Testimony, Tr. at 143.

<sup>27</sup> *Id.*

<sup>28</sup> Case No. IPC-E-00-12, Said Rebuttal Testimony, Tr. at 277.