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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE) **CASE NO. IPC-E-13-10**
APPLICATION OF IDAHO POWER)
COMPANY FOR AUTHORITY TO) REPLY COMMENTS OF THE
IMPLEMENT POWER COST) INDUSTRIAL CUSTOMERS OF
ADJUSTMENT MECHANISM (PCA)) IDAHO POWER
RATES FROM JUNE 1, 2013 THROUGH)
MAY 31, 2014

The Industrial Customers of Idaho Power (“ICIP”) by and through their attorney of record, Peter J. Richardson, hereby provides the following reply comments to Staff’s initial comments in the above captioned docket.

The ICIP is highly appreciative of the Staff’s recommendation to mitigate this year’s unprecedented increase in the PCA. The ICIP is also appreciative of the Company’s willingness to mitigate the increase. Given that Idaho Power’s earnings are healthy and cash flow positive, as noted in the ICIP’s opening comments, there is no pressing need to compress the recovery of this extraordinary increase into a two year time frame. As the United States Department of Energy observed in its Comments

The Department respectfully suggests that a first year single digit percentage increase should be the cap adopted by the Commission in this case for all individual customer classes and special contract customers. Any remaining balance due to the Company could be amortized over the subsequent two years with the single digit percentage increase cap applying again in the second year. If adopted, this will reduce the risk that

rate shock will unnecessarily and adversely affect energy intensive customers and Idaho's economy, with negative effects which could extend for years.

The United States DOE and the Industrial Customers agree, a double digit increase is not necessary for Idaho Power's health and would have untold potential to harm its customers. The Commission is respectfully urged to mitigate the impact of this requested increase over a three year period by holding the increase to single digit percentage increase in each year.

RESPECTFULLY SUBMITTED this 20TH day of May 2013

Richardson & O'Leary, PLLC

By 

Peter J. Richardson

Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I hereby certify that on 20th day of May 2013, copies of the foregoing Reply Comments of the Industrial Customers of Idaho Power were hand delivered to:

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A handwritten signature in blue ink, appearing to read "by Nina Curtis". The signature is written in a cursive style and is positioned above a horizontal line.

Nina Curtis
Administrative Assistant