

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

RECEIVED  
2013 NOV 12 AM 11:36  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER )  
COMPANY'S 2013 INTEGRATED )  
RESOURCE PLAN. )  
) IDAHO CONSERVATION LEAGUE'S  
) MOTION TO ACCEPT LATE FILED  
) COMMENTS

The Idaho Conservation League (ICL) submits this Motion to Accept Late Filed Comments. Order No. 32868 set a deadline of 90 days from August 7, 2013 for comments on Idaho Power's 2013 Integrated Resource Plan. Following IDAPA 31.01.01.017, the deadline was November 5, 2013. The PUC press release stated the deadline was November 7, 2013. ICL initially relied on the press release instead of Order No. 32868, although ICL acknowledges the Order sets the official deadline. However, ICL moves the Commission to accept ICL's late filed comments because the delay does not prejudice the substantial rights of other parties, nor disrupt the proceedings. IDAPA 31.01.01.065.

On November 5<sup>th</sup> ICL's counsel was drafting ICL's comments, noticed the Staff filed their comments, and recounted the deadline based on Order No. 32868 and Rule 17. Upon realizing the mistake, ICL's counsel completed the comments as quickly as possible and submitted these to the parties electronically on November 5<sup>th</sup> at 10:09 PM. ICL filed the original comments and requisite copies with the Idaho Public Utilities Commission on November 6<sup>th</sup> at 9:09 AM.

ICL's comments rely only on information that was publicly available on or before 5:00 PM on November 5, 2013. While Order No 32868 does not establish a reply comment period, ICL waives any challenge to the filing of reply comments. ICL does not request any briefing or a hearing on this motion, nor is this motion necessary to be resolved in fewer than fourteen days. IDAPA 31.01.01.256. For these reasons, ICL submits our late filing does not prejudice other parties or disrupt the proceedings. ICL respectfully requests the Commission grant this motion.

DATED this 11<sup>th</sup> day of November 2013.

Respectfully submitted,

  
Benjamin J. Otto  
Idaho Conservation League

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of November 2013, I delivered true and correct copies of the foregoing MOTION OF THE IDAHO CONSERVATION LEAGUE to the following persons via the method of service noted:

Hand delivery:

Jean Jewell  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983

Electronic Mail:

Lisa Nordstrom  
Jennifer Reinhardt  
Greg W Said  
Tim E Tatum  
Idaho Power Company  
Box 70  
Boise, ID 83707  
lnordsrom@idahopower.com  
jreinhardt@idahopower.com  
dockets@idahopower.com  
gsaid@idahopower.com  
ttatum@idahopower.com

Thomas H. Nelson  
Attorney at Law  
Box 1211  
Welches OR 97068  
nelson@thnelson.com

Nancy Esteb PhD  
PO Box 490  
Carlsborg WA 98324  
betseesteb@qwest.net

Ken Miller  
Clean Energy Program Director  
Snake River Alliance  
P.O. Box 1731  
Boise, ID 83701  
kmiller@snakeriveralliance.org

  
Benjamin J. Otto

Peter J Richardson  
Richardson Adams  
515 N 27<sup>th</sup> St  
Boise ID 83616  
Peter@richardsonadams.com

Dr. Don Reading  
6070 Hill Rd  
Boise, ID 83703  
dreading@mindspring.com