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IDAHO PUBLIC UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-13-20
COMPANY'S APPLICATION FOR)	
AUTHORITY TO ESTABLISH A NEW)	COMMENTS OF THE INDUSTRIAL
BASE LEVEL OF NET POWER SUPPLY)	CUSTOMERS OF IDAHO POWER
EXPENSE)	AND MICRON TECHNOLOGY, INC.
_____)	

Pursuant to the Notice of Application and Notice of Modified Procedure issued by the Idaho Public Utilities Commission ("Commission") on November 26, 2013, the Industrial

Customers of Idaho Power (“ICIP”), by and through their attorney of record, Peter J. Richardson, and Micron Technology, Inc. (“Micron”) by and through its attorneys Holland & Hart LLP, hereby provide the following comments. Idaho Power Company (“Idaho Power” or the “Company”) seeks approval for establishing new base level net power supply expenses as the basis for quantifying its 2014/2015 Power Cost Adjustment (“PCA”) rates proposed to become effective June 1, 2014. ICIP and Micron respectfully request that the Commission consider requiring that the rates be apportioned among customer classes based on Idaho Power’s most recent cost-of-service study rather than on the cents per kWh basis proposed by Idaho Power. This would result in a more reasonable and equitable allocation of costs among consumers based on a demand, as well as an energy, basis.

Idaho Power filed its Application on November 1, 2013 (errata filed November 4, 2013) seeking authorization to increase its total system “base level” net power supply expense (“NPSE”) from \$199,003,778 to \$305,684,869. The Company would use the increased NPSE to update base rates on June 1, 2014. It would also use the updated NPSE to adjust the 2014/2015 PCA. According to the Company:

If approved, the Company’s proposed change in base level NPSE would have no net impact to the overall revenue collected through customer rates and would also be “revenue neutral” for all classes of Idaho Customers. ... Idaho Power believes its proposal in this case is a simple and effective way to address the Commission’s concerns regarding the PCA and would restore the PCA to its intended purpose with no impact to customers’ bills.¹

The Company proposes to move the \$99.9 million (on an Idaho jurisdictional basis) that has been carried forward in the PCA’s rates to proposed new base rates – all on a per kWh basis.

Since its inception, the PCA allocated year-to-year changes on an energy (per kWh)

¹ Direct testimony of Timothy Tatum, pp 3 – 4.