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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
PACIFICORP DBA ROCKY MOUNTAIN) **CASE NOS. IPC-E-14-41**
POWER AND IDAHO POWER COMPANY FOR) **PAC-E-14-11**
AN ORDER AUTHORIZING THE EXCHANGE)
OF CERTAIN TRANSMISSION ASSETS) **COMMENTS OF THE**
) **COMMISSION STAFF**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Daphne Huang, Deputy Attorney General, and in response to the Notice of Modified Procedure issued in Order No. 33231, submits the following comments.

BACKGROUND

On December 19, 2014, Idaho Power Company (Idaho Power) and PacifiCorp dba Rocky Mountain Power and Pacific Power (collectively “PacifiCorp”) (together, the “Parties” or singularly the “Party”) filed a joint Application asking the Commission to approve the exchange of certain transmission assets between the Parties pursuant to Idaho Code § 61-328.

Idaho Code § 61-328 establishes that an electric utility must obtain approval from the Commission before it sells or transfers ownership in any generation, transmission, or distribution plant. Section 61-328 provides the Commission with authority to authorize the sale or transfer of ownership according to the following: “Before authorizing the transaction, the public utilities commission shall find: (a) That the transaction is consistent with the public interest; (b) That the