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LISA D. NORDSTROM
Lead Counsel
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October 21, 2016

VIA HAND DELIVERY

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

Re: Case No. IPC-E-16-24
Recovery of Costs Associated with North Valmy Power Plant – Idaho Power Company's Application and Testimony

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of Idaho Power Company's Application in the above matter.

In addition, enclosed are an original and eight (8) copies each of the Direct Testimony of Matthew T. Larkin and the Direct Testimony of Tom Harvey filed in support of the Application. One copy of each of the aforementioned testimonies has been designated as the "Reporter's Copy." In addition, a disk containing a Word version of both testimonies is enclosed for the Reporter.

Lastly, four (4) copies each of Idaho Power Company's press release and customer notice are also enclosed.

Very truly yours,

Lisa D. Nordstrom

LDN:csb
Enclosures

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UTILITIES COMMISSION

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR) CASE NO. IPC-E-16-24
AUTHORITY TO INCREASE ITS RATES)
FOR ELECTRIC SERVICE TO RECOVER) APPLICATION
COSTS ASSOCIATED WITH THE NORTH)
VALMY POWER PLANT.)
_____)

Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* § 61-524 and RP 052, 121, and 125, hereby respectfully makes application to the Idaho Public Utilities Commission ("Commission") for an order authorizing the Company to: (1) accelerate the depreciation schedule for the North Valmy power plant ("Valmy") to allow the plant to be fully depreciated by December 31, 2025, (2) establish a balancing account to track the incremental costs and benefits associated with the accelerated Valmy end-of-life date, and (3) adjust customer rates to recover the associated incremental annual levelized revenue requirement of \$28.50 million with an effective date of June 1, 2017. This Application is being filed with the Commission

concurrently with an application in Case No. IPC-E-16-23 requesting approval to institute revised depreciation rates for the Company's electric plant-in-service and adjust Idaho jurisdictional base rates to reflect the revised depreciation rates ("Depreciation Application"). Idaho Power is simultaneously filing these applications in order to facilitate a single rate change for customers. Idaho Power requests the Commission issue an order approving this Application by April 1, 2017, to allow the Company to incorporate any rate impacts associated with this Application in the Company's April 14, 2017, Power Cost Adjustment filing.

In support of this Application, Idaho Power asserts as follows:

I. BACKGROUND

1. Idaho Power is to file an updated depreciation study within five years of the Company's previous depreciation study. The Company's most recent update, approved by Order No. 32559 in Case No. IPC-E-12-08, went into effect on June 1, 2012, and reflects a plant life for Valmy of 50 years for each unit, resulting in a retirement year of 2031 for Unit 1 and 2035 for Unit 2. In 2013, the Public Utilities Commission of Nevada ("PUCN") approved a 2025 end-of-life date for both Unit 1 and Unit 2 for NV Energy, Idaho Power's co-owner in Valmy (Docket No. 13-06002, Modified Final Order dated January 29, 2014). Likewise, in its most recent depreciation study filed with the PUCN on June 6, 2016, NV Energy used the same end-of-life date for both units (Docket No. 16-06008).

2. Because nearly five years have passed since the last update, the Company began preparations in early 2016 to file a new depreciation study. Through these preparations, the Company identified that significant changes had occurred with regard to the life of the Valmy plant, warranting the need for specific review separate from the Company's general depreciation filing. The 2025 end-of-life date currently

utilized by NV Energy provides an indication that the Valmy plant will not be operational beyond 2025. Therefore, the Company believes it is appropriate to consider Valmy-related issues concurrently with the comprehensive depreciation study filed in Case No. IPC-E-16-23.

II. VALMY

3. Valmy is a coal-fired power plant that consists of two units and is located near Winnemucca, Nevada. Unit 1 went in service in 1981 and Unit 2 followed in 1985. Idaho Power owns 50 percent, or 284 megawatts¹ (“MW”) (generator nameplate rating), of Valmy. NV Energy also has 50 percent ownership and is the operator of the Valmy facility. Idaho Power and NV Energy work jointly to make decisions regarding any environmental investment, plant retirement, or conversion. The plant is connected via a single 345 kilovolt transmission line to the Idaho Power control area at the Midpoint substation. Idaho Power has the northbound capacity and NV Energy has the southbound capacity of this line.

4. Coal for the plant is shipped via railroad from various mines in Utah, Wyoming, and Colorado. The power plant uses a variety of emissions control technologies, including state-of-the art fabric filters that remove more than 99 percent of particulate emissions. Additionally, a Dry Sorbent Injection (“DSI”) system is used on Unit 1 to reduce acid gas emissions and flue-gas scrubber technology is utilized on Unit 2 for the reduction of sulfur dioxide emissions. Both units have an activated carbon injection system installed to control the emissions of mercury from the flue gas.

III. VALMY OPERATIONS

5. A 2031 end-of-life for Unit 1 and a 2035 end-of-life for Unit 2 were used in the Idaho Power prepared Coal Unit Environmental Investment Analysis for the Jim

¹ For planning purposes, Idaho Power uses the net dependable capability of 262 MW.

Bridger and North Valmy Coal-Fired Power Plants (“2013 Coal Study”). The analysis performed for the 2013 Coal Study examined future investments required for environmental compliance at existing coal units and compared those investments to the costs of two alternatives: (1) replacing such units with combined cycle combustion turbine units or (2) converting the existing coal units to natural gas. Idaho Power concluded that installation of the investments required for environmental compliance was a low-cost approach to retain a diversified portfolio of generation assets for customers.

6. Therefore, the Company continued to include Valmy in its generation portfolio for the 2013 Integrated Resource Plan (“IRP”) and future resource planning. Similarly, the preferred resource portfolio identified in the 2013 IRP included continued operations of the Valmy coal facility in full compliance with environmental regulations through the 2013-2032 planning period. At that time, Idaho Power committed financially to the investments required on Unit 1 needed to meet current environmental regulation and installation of the required emission control systems was complete in the spring of 2015.

7. As part of the Company’s 2015 IRP, Idaho Power again analyzed a variety of retirement dates for Valmy. Results consistently indicated favorable economics associated with two significant resource actions: the Boardman to Hemingway (“B2H”) transmission line and the early retirement of Valmy. The preferred portfolio selected for the 2015-2034 planning horizon contained both actions in the year 2025, with completion of the transmission line preceding the end-of-year coal plant retirement. The 2015-2018 action plan recognized in the 2015 IRP included ongoing permitting, planning studies and regulatory filings associated with the B2H transmission line during all four years, and indicated in 2016 Idaho Power would work with NV Energy to

synchronize depreciation dates and determine if a date could be established to cease coal-fired operations. Case No. IPC-E-15-19, Order No. 33441. This filing will synchronize depreciation rates between the two companies.

8. Significant changes in Valmy operations have occurred between 2010 and 2014. In 2011, the average price Idaho Power received for off-system sales was \$22.71 per MW compared to 2015 when the average price Idaho Power received for off-system sales was only \$11.82 per MW. Moreover, year-to-date 2016, Idaho Power's average price for off-system sales is only \$8.76 per MW. In addition to reducing off-system sales, the significant decrease in market prices has resulted in a decrease in the number of hours Valmy operates economically, as the dispatch cost is now typically higher than the market price. Rather than a resource used to generate off-system sales, Idaho Power has been relying on Valmy to meet the Company's peak energy needs, preserving the balanced portfolio needed to reliably serve Idaho Power customers during all types of system conditions.

9. As shown in the preferred portfolio of Idaho Power's 2015 IRP, the economics of Valmy's operation are impacted in the long term as new resources such as B2H or other operating facilities are available to maintain the balanced portfolio required to serve load reliably. Idaho Power relies on Valmy to meet peak energy needs and to preserve the balanced portfolio needed to reliably serve customers during all types of system conditions. When extreme cold weather or extreme hot temperatures occur in the West, Valmy is providing reliable energy and capacity to serve customers. Idaho Power will continue to rely on Valmy during similar circumstances in the future as load increases in the Company's service territory and until the addition of new resources are available during peak hours or can provide additional transmission capacity.

10. In 2016, Idaho Power assessed continued use of the 2025 end-of-life assumption for Valmy using an updated evaluation of the present value revenue requirement of operating period alternatives, which is provided as Exhibit No. 6 to the direct testimony of Company witness Tom Harvey that accompanies this Application. The Company's analysis determined the net present value of the revenue requirement associated with a 2025 end-of-life is \$103 million less than the revenue requirement of a 2031/2034 retirement date, concluding that a 2025 end-of-life will strike a balance between long-term revenue requirement savings and the immediate customer rate impact.

IV. VALMY INVESTMENTS SINCE 2012

11. Since Idaho Power's last general rate case, Valmy plant balances have increased approximately \$70 million due to a number of investments required at Valmy to ensure the plant continues to operate in a safe, efficient and reliable manner, including investments required for environmental compliance, as well as a number of investments for routine maintenance and repair. All the investments made between the 2011 test year and July 31, 2016, were necessary for either environmental compliance, the safe and economic operation of the plant, or for reliability purposes.

12. Exhibit No. 4 to the testimony of Mr. Harvey details the investments made at Valmy since the Company's last general rate case, including the spend per year and whether the investment was for environmental compliance, the safe and economic operation of the plant, or for reliability purposes. Exhibit No. 4 also includes a description and justification of the investments made. For all planned capital projects, Idaho Power receives from the plant operator, NV Energy, a description of the project, the factors driving the need for the project, and a recommendation for the work to be performed.

13. The investments for environmental compliance include DSI installation and coal pipe replacement on Unit 1, the scrubber upgrade on Unit 2, the coal crusher belt feeder project, dust collector upgrade, caustic tank building replacement, evaporation pond liner replacement, bed demineralizer replacement, and the coal combustion residual compliance project. In addition, a number of investments were made at the plant and on either or both units to maintain the safe, reliable, and economic operation of the plant. The capital investments made at Valmy since the last general rate case were prudent and essential for continued operation of the plant.

V. ACCELERATED RECOVERY OF VALMY-RELATED COSTS

14. As described in the testimony of Mr. Harvey, evidence strongly supports the modification of the existing Valmy depreciation schedule to reflect a 2025 shutdown date. It is beneficial to accelerate Valmy's depreciation schedule at this time because (1) doing so will result in the appropriate matching of cost recovery with the remaining operating life of the plant and (2) accelerating the deprecation schedule at this time will mitigate future rate impacts associated with the earlier shutdown of the plant.

15. The Company anticipates that customers will continue to be served by the Valmy plant until year-end 2025, at which point the plant is no longer expected to be utilized. By accelerating the depreciation schedule to reflect a 2025 shutdown date, the recovery of Valmy-related costs will align with the remaining operating life of the plant, resulting in cost recovery from customers who are served by the plant.

16. The more time that passes before the depreciation schedule at Valmy is adjusted to reflect the 2025 retirement date, the larger the revenue requirement increase needed to allow for full cost recovery. A delay of just 12 months would result in an annual levelized revenue requirement of over \$30.54 million and a delay of four

years would result in an annual levelized revenue requirement amount of over \$43.75 million.

VI. RECOMMENDED REGULATORY ACCOUNTING AND RATEMAKING TREATMENT

17. In addition to the earlier end-of-life date, Valmy will also require incremental investments to maintain operations prior to ultimately decommissioning the plant. However, the specific timing and exact amounts of these future investments are not yet known. For these reasons, Idaho Power proposes the establishment of a balancing account that would allow flexibility for the timing and recovery of the remaining Valmy revenue requirement.

18. There are three types of costs the Company anticipates booking to the balancing account: (1) the accelerated depreciation associated with existing Valmy plant investments, (2) the return on the undepreciated capital investments at Valmy until its end-of-life, and (3) decommissioning costs related to the Valmy shutdown. Under the proposed approach, the Company will replace the base rate revenue recovery associated with Idaho Power's existing investment in Valmy with a levelized revenue requirement to be tracked in the Valmy balancing account.

19. The proposed accounting treatment will result in accelerated depreciation expense related to all Valmy plant investments as compared to current depreciation that is based on a retirement date of 2031 for Unit 1 and 2035 for Unit 2. In addition, although Valmy's end-of-life is expected to occur in 2025, there will be required investments at the plant in addition to its normal maintenance to keep the plant operational until that time, including outages scheduled in 2018 and 2019. Both units are on a three-year outage cycle that requires each unit to be taken down once every three years for full inspection and selected refurbishment. The outages should be the

last large ones performed and will help ensure the units are operational and can continue to provide reliable service through 2025. The return and associated depreciation expense will be tracked in the balancing account. Finally, Idaho Power is also proposing to track decommissioning costs related to the Valmy 2025 end-of-life in the balancing account.

20. The Valmy balancing account will smooth revenue requirement impacts of a 2025 Valmy shutdown over the remaining eight and a half years of the plant's life and allow for full recovery of Valmy-related costs by its end-of-life. This will effectively align the cost recovery period with the remaining operating life of the plant, resulting in an appropriate matching of cost recovery from customers who benefit from the plant's operations while mitigating the risk of future customers bearing the costs of a plant that will no longer be providing service. Additionally, through the proposed accounting treatment, customers will pay no more or no less than the actual fixed costs of operating the Valmy plant between the proposed effective date of June 1, 2017, and the proposed end-of-life date in 2025.

21. The proposed accounting treatment will result in accelerated depreciation expense related to all Valmy plant investments as compared to current depreciation based on a retirement date of 2031 for Unit 1 and 2035 for Unit 2. As described more fully in the direct testimony of Company witness Matthew T. Larkin that accompanies this Application, the Company is requesting recovery of the levelized revenue requirement that includes the costs of accelerating the depreciation of the Valmy plant, the return associated with the Valmy capital investments net of accumulated depreciation forecasted through the remaining life of the plant, and the decommissioning costs associated with the Valmy 2025 end-of-life. The Idaho

jurisdictional incremental annual levelized revenue requirement the Company is requesting to recover in this proceeding is \$28,497,934.

22. The Company proposes to allocate the increase related to the Valmy balancing account using the jurisdictional separation study methodology consistent with that utilized to determine the Idaho jurisdictional revenue requirement in Case No. IPC-E-11-08. The Company requests that the incremental revenue requirement of approximately \$28.50 million be recovered from all customer classes through a uniform percentage increase to all base rate components except the service charge. The proposed change equates to an overall increase of 3.10 percent (see Attachment No. 1).

VII. PROPOSED TARIFF

23. As explained above, Idaho Power is separately proposing rate changes associated with the Depreciation Application in Case No. IPC-E-16-23 in addition to the Valmy balancing account requested by this Application. The Company is filing one set of proposed tariff sheets specifying the proposed rates for providing retail electric service to its customers in the state of Idaho following the inclusion of both of the proposed rate changes. The tariffs are being filed as Attachment Nos. 4 and 5 to the Company's Depreciation Application, in both clean and legislative format, respectively.

24. The Company believes that filing individual sets of tariff sheets with each case as required by RP 121.01 would be administratively complex and would not aid the Commission and interested parties with their review of these proposed rate adjustments. Idaho Power considers the filing of one set of tariff sheets with the cumulative impact of the proposed rates will comply with the spirit of the Commission's rule. The Company will make a compliance filing when final orders are received on both of the proposed requests to change rates effective June 1, 2017. The compliance filing

will include tariff sheets that show the cumulative impact of rate changes associated with both cases.

25. Attachment No. 2 to this Application shows a comparison of revenues from the various tariff customers under Idaho Power's existing rates to the corresponding new revenue levels resulting from the proposed Valmy ratemaking treatment and the updated depreciation study.

VIII. MODIFIED PROCEDURE

26. Idaho Power believes that a hearing is not necessary to consider the issues presented herein, and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing. RP 201 *et seq.* If, however, the Commission determines that a technical hearing is required, the Company stands ready to present its testimony and support the Application in such hearing.

IX. COMMUNICATIONS AND SERVICE OF PLEADINGS

27. This Application will be brought to the attention of Idaho Power's customers by means of both a press release to media in the Company's service area and a customer notice distributed in customers' bills, both of which are accompanying this Application. The customer notice will be distributed over the course of the Company's current billing cycle, with the last notice being sent on December 6, 2016. In addition to describing this filing, these customer communications also describe proposed rate changes associated with the Company's Depreciation Application. Idaho Power will also keep its Application open for public inspection at its offices throughout the state of Idaho. Idaho Power asserts that this notice procedure satisfies the Rules of Practice and Procedure of this Commission; however, the Company will, in the

alternative, bring the Application to the attention of its affected customers through any other means directed by the Commission.

28. Service of pleadings, exhibits, orders, and other documents relating to this proceeding should be served on the following:

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Matt Larkin
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
mlarkin@idahopower.com

X. REQUEST FOR RELIEF

29. Idaho Power respectfully requests that the Commission issue an order by April 1, 2017, authorizing the Company to: (1) accelerate the depreciation schedule for Valmy to allow the plant to be fully depreciated by December 31, 2025, (2) establish a balancing account to track the incremental costs and benefits associated with the accelerated Valmy end-of-life date, and (3) adjust customer rates to recover the associated incremental annual levelized revenue requirement of \$28,497,934 with an effective date of June 1, 2017.

DATED at Boise, Idaho, this 21st day of October 2016.



LISA D. NORDSTROM
Attorney for Idaho Power Company

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-16-24

IDAHO POWER COMPANY

ATTACHMENT NO. 1

Idaho Power Company
 Calculation of Revenue Impact 2017 - 2018
 State of Idaho
 Valmy Plant Depreciable Life
 Filed October 21, 2016

Summary of Revenue Impact
 Current Billed Revenue to Proposed Billed Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers ⁽¹⁾	Normalized Energy (kWh) ⁽¹⁾	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed Revenue
<u>Uniform Tariff Rates:</u>										
1	Residential Service	1	435,407	5,011,095,429	\$510,150,917	101.80	\$12,357,022	\$522,507,939	104.27	2.42%
2	Master Metered Mobile Home Park	3	22	4,157,443	\$406,059	97.67	\$10,345	\$416,405	100.16	2.55%
3	Residential Service Energy Watch	4	0	0	\$0	0.00	\$0	\$0	0.00	N/A
4	Residential Service Time-of-Day	5	1,304	24,071,367	\$2,365,671	98.28	\$58,283	\$2,423,955	100.70	2.46%
5	Small General Service	7	27,766	123,114,157	\$15,795,244	128.30	\$363,195	\$16,158,439	131.25	2.30%
6	Large General Service	9	35,288	3,767,082,018	\$273,952,670	72.72	\$7,064,758	\$281,017,428	74.60	2.58%
7	Dusk to Dawn Lighting	15	0	6,361,595	\$1,292,427	203.16	\$36,276	\$1,328,703	208.86	2.81%
8	Large Power Service	19	113	2,210,706,735	\$128,106,195	57.95	\$3,316,216	\$131,422,411	59.45	2.59%
9	Agricultural Irrigation Service	24	18,485	1,867,191,356	\$149,024,634	79.81	\$3,928,428	\$152,953,062	81.92	2.64%
10	Unmetered General Service	40	1,359	11,414,394	\$994,146	87.10	\$26,771	\$1,020,917	89.44	2.69%
11	Street Lighting	41	1,742	27,412,831	\$3,609,056	131.66	\$99,040	\$3,708,095	135.27	2.74%
12	Traffic Control Lighting	42	563	2,811,020	\$178,096	63.36	\$4,671	\$182,767	65.02	2.62%
13	Total Uniform Tariffs		522,049	13,055,418,345	\$1,085,875,115	83.17	\$27,265,006	\$1,113,140,121	85.26	2.51%
<u>Special Contracts:</u>										
14	Micron	26	1	549,560,120	\$28,305,770	51.51	\$724,865	\$29,030,635	52.83	2.56%
15	J R Simplot	29	1	192,745,251	\$9,369,630	48.61	\$238,092	\$9,607,722	49.85	2.54%
16	DOE	30	1	209,846,587	\$10,572,786	50.38	\$269,971	\$10,842,757	51.67	2.55%
17	Total Special Contracts		3	952,151,958	\$48,248,186	50.67	\$1,232,928	\$49,481,114	51.97	2.56%
18	Total Idaho Retail Sales		522,052	14,007,570,303	\$1,134,123,301	80.97	\$28,497,934	\$1,162,621,235	83.00	2.51%

(1) June 1, 2017 - May 31, 2018 Forecasted Test Year

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

CASE NO. IPC-E-16-24

IDAHO POWER COMPANY

ATTACHMENT NO. 2

Idaho Power Company
 Calculation of Revenue Impact 2017 - 2018
 State of Idaho
 Valmy Plant Depreciable Life and Depreciation Study Combined
 Filed October 21, 2016

Summary of Revenue Impact
 Current Billed Revenue to Proposed Billed Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers ⁽¹⁾	Normalized Energy (kWh) ⁽¹⁾	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed Revenue
<u>Uniform Tariff Rates:</u>										
1	Residential Service	1	435,407	5,011,095,429	\$510,150,917	101.80	\$15,250,330	\$525,401,247	104.85	2.99%
2	Master Metered Mobile Home Park	3	22	4,157,443	\$406,059	97.67	\$12,768	\$418,827	100.74	3.14%
3	Residential Service Energy Watch	4	0	0	\$0	0.00	\$0	\$0	0.00	N/A
4	Residential Service Time-of-Day	5	1,304	24,071,367	\$2,365,671	98.28	\$71,930	\$2,437,601	101.27	3.04%
5	Small General Service	7	27,766	123,114,157	\$15,795,244	128.30	\$448,235	\$16,243,479	131.94	2.84%
6	Large General Service	9	35,288	3,767,082,018	\$273,952,670	72.72	\$8,718,921	\$282,671,591	75.04	3.18%
7	Dusk to Dawn Lighting	15	0	6,361,595	\$1,292,427	203.16	\$44,770	\$1,337,197	210.20	3.46%
8	Large Power Service	19	113	2,210,706,735	\$128,106,195	57.95	\$4,092,685	\$132,198,879	59.80	3.19%
9	Agricultural Irrigation Service	24	18,485	1,867,191,356	\$149,024,634	79.81	\$4,848,241	\$153,872,875	82.41	3.25%
10	Unmetered General Service	40	1,359	11,414,394	\$994,146	87.10	\$33,040	\$1,027,185	89.99	3.32%
11	Street Lighting	41	1,742	27,412,831	\$3,609,056	131.66	\$122,229	\$3,731,285	136.11	3.39%
12	Traffic Control Lighting	42	563	2,811,020	\$178,096	63.36	\$5,765	\$183,860	65.41	3.24%
13	Total Uniform Tariffs		522,049	13,055,418,345	\$1,085,875,115	83.17	\$33,648,913	\$1,119,524,028	85.75	3.10%
<u>Special Contracts:</u>										
14	Micron	26	1	549,560,120	\$28,305,770	51.51	\$894,587	\$29,200,357	53.13	3.16%
15	J R Simplot	29	1	192,745,251	\$9,369,630	48.61	\$293,839	\$9,663,469	50.14	3.14%
16	DOE	30	1	209,846,587	\$10,572,786	50.38	\$333,183	\$10,905,969	51.97	3.15%
17	Total Special Contracts		3	952,151,958	\$48,248,186	50.67	\$1,521,609	\$49,769,795	52.27	3.15%
18	Total Idaho Retail Sales		522,052	14,007,570,303	\$1,134,123,301	80.97	\$35,170,522	\$1,169,293,823	83.48	3.10%

(1) June 1, 2017 - May 31, 2018 Forecasted Test Year