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IDAHO PUBLIC  
UTILITIES COMMISSION

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**VIA HAND DELIVERY**

December 27, 2018

Ms. Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, ID 83720-0074

RE: Case No. IPC-E-16-32 – Idaho Power Company's Application for a  
Determination of Hells Canyon Complex ("HCC") Relicensing Costs  
through 2015 as Prudently Incurred

Dear Ms. Hanian:

In Order No. 34031, the Idaho Public Utilities Commission ("Commission") approved a stipulation between Idaho Power Company ("Company"), Commission Staff, and the Idaho Irrigation Pumpers Association ("IIPA") (collectively referred to as "Signing Parties"), providing for interested parties to (1) collaborate on a process for filing future annual reports, including the content of the report, and (2) work to identify the detail requested to be contained within a work order description to allow for the reporting of work orders by projects specific to HCC relicensing work. The Signing Parties agreed that collaboration on both items would be completed by July 1, 2018.

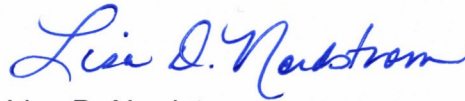
On June 29, 2018, Idaho Power notified the Commission that the Signing Parties needed additional time to address outstanding issues and collaborate on the content of future annual reports and work order detail, requesting a completion deadline of December 31, 2018. Over the last few months, the Signing Parties have prepared an outline detailing the content to be incorporated in future annual reports, which is included as Attachment 1. The outline identifies in bold font those items that will be recurring with each annual report. It also specifies some items exclusive to the 2018 Annual Report, which is to be filed by February 28, 2019, including an explanation of Idaho Power's efforts to enhance accounting records to better identify how expenditures are necessary to relicensing efforts. This initial report, as well as future annual reports, will be filed in Case No. IPC-E-16-32 in February of each year.

Ms. Diane Hanian  
Commission Secretary  
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December 27, 2018  
Page 2

In addition to agreement on the content of future annual reports, at the request of the IIPA, Idaho Power has committed to including an aggregated estimate of Hells Canyon relicensing expenditures, including the estimated rate impact as a percentage, in future versions of the "Rate Impact Disclosure" report posted to the Company's website.

If you have any questions regarding this notification, please contact Senior Regulatory Analyst Courtney Waites at (208) 388-5612 or [cwaites@idahopower.com](mailto:cwaites@idahopower.com).

Sincerely,



Lisa D. Nordstrom

LDN/kkt

cc: Service List

**BEFORE THE**  
**IDAHO PUBLIC UTILITIES COMMISSION**

**CASE NO. IPC-E-16-32**

**IDAHO POWER COMPANY**

**ATTACHMENT 1**

**HELLS CANYON COMPLEX RELICENSING EXPENDITURES**  
**ANNUAL REPORT OUTLINE\***

**1. Background**

- a. Summary of outstanding issues prior to the Federal Energy Regulatory Commission's ("FERC") issuance of a final license**
  - i. Clean Water Act § 401 certification
  - ii. Endangered Species Act ("ESA") consultation
  - iii. Potential revised or supplemental National Environmental Policy Act ("NEPA") analysis

**2. Summary of Activities Since Last Report**

- a. Clean Water Act § 401 certification
  - i. Discussion of 2018 Application
  - ii. Update on efforts to comply with state water quality standards so that water certifications can be issued
  - iii. Update on negotiations between the states and Idaho Power Company on resolution of the fish passage issue
- b. Formal consultation under the ESA
- c. Final Environmental Impact Statement, filing of any comments and/or update on supplemental NEPA analysis

**3. Accounting Improvements/Changes**

- a. Detail around the improvements to the Work Order accounting processes to better track project costs
- b. Explanation of summary expenditures incurred since most recent prudence filing**

**4. Conclusion**

- a. Identification of any upcoming milestones**
- b. Estimated license date**

\*Items in bold would be recurring with each annual report. Non-bold items may change from year-to-year based on current activity. Non-bold items listed above are envisioned to be in the first report due February 28, 2019.