

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER SMITH
COMMISSIONER REDFORD
COMMISSION SECRETARY
COMMISSION STAFF**

FROM: DON HOWELL

DATE: FEBRUARY 28, 2007

**SUBJECT: ROCKY MOUNTAIN POWER'S REQUEST TO POSTPONE THE
FILING OF ITS INTEGRATED RESOURCE PLAN, CASE NO. PAC-E-
07-03**

On February 23, 2007, Rocky Mountain Power filed a "Motion" to postpone the filing of its 2006 Integrated Resource Plan (IRP). Rocky Mountain Power is a division of PacifiCorp and serves more than 65,000 electric customers in southeastern Idaho. Rocky Mountain's IRP was scheduled to be filed in December 2006 but the Company now requests permission to file its IRP no later than May 30, 2007.

BACKGROUND

The biennial IRP is a planning document that generally sets forth how electric and gas utilities intend to meet the energy requirements of their customers over the next 10 years. In Order No. 22299 the Commission directed each electric utility to file a biennial IRP that analyzes its customer base, load growth, supply-side resources, and demand-side management (DSM) resources. In December 1998, the Commission issued Order No. 27835 directing Rocky Mountain to file its IRP in December 2000 and every two years thereafter.

THE MOTION

In its Motion for Extension, Rocky Mountain states that the delay in completing and filing its 2006 IRP is attributable to two primary reasons. First and foremost, Rocky Mountain and PacifiCorp are still in the process of integrating themselves into the MidAmerican Energy Holding Company. In March 2006, the Commission approved MidAmerican's acquisition of PacifiCorp. Order No. 29998. As part of the integrated operating company, Rocky Mountain states that it has just finished its "first long-range planning cycle under [MidAmerican]." Motion

at 2. PacifiCorp indicates that it intends to incorporate the outcome of MidAmerican's planning process into Rocky Mountain's IRP.

Second, Rocky Mountain notes that it is currently in the process of drafting a request for proposal (RFP) to procure additional long-term resources for 2012. While an RFP does not require prior approval from this Commission, such prior approval is required for Utah and Oregon. Rocky Mountain reports that its Utah RFP is currently under review but Oregon has rejected the draft RFP. Rocky Mountain asserts that additional time for filing the IRP is necessary so that the RFP can be reflected in the IRP filing. *Id.*

Consequently, Rocky Mountain makes two requests. First, it asks that the Commission approve an extension of time to file its IRP to no later than May 30, 2007. Second, the Company requests that the filing date for future IRPs be adjusted to coincide with its business planning cycle with MidAmerican. Rocky Mountain requests that future IRPs be due no later than the last business day of March on a biennial basis beginning in 2009.

STAFF RECOMMENDATION

Staff recommends that the Commission grant the new filing dates for Rocky Mountain's present and future IRPs. Given the administrative nature of Rocky Mountain's request, the Staff recommends that the Commission treat the Company's Motion as a petition requesting modification of an existing Order. IDAPA 31.01.01.053. Staff believes there is good cause to grant the requested relief without further notice or Modified Procedure.

COMMISSION DECISION

Does the Commission wish to grant Rocky Mountain's Motion to postpone the present IRP filing until no later than May 30, 2007? Does the Commission approve that future IRPs be filed no later than the last business day of March beginning in 2009? Does the Commission find that there is good cause to approve the request without further notice or Modified Procedure? Does the Commission wish to address any other issue?



Don Howell

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