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February 28, 2011

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: UE 218 – Idaho Power Company's 2010 Annual Power Supply Expense True-Up

Attention Filing Center:

Enclosed in the above-referenced docket are an original and five copies of Idaho Power Company's 2010 Annual Power Supply Expense True-Up and Direct Testimony and Exhibits of Courtney Waites.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service. Please contact me with any questions..

Very truly yours,


Wendy McIndoo

cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in
UE ____ on the following named person(s) on the date indicated below by email and first-
class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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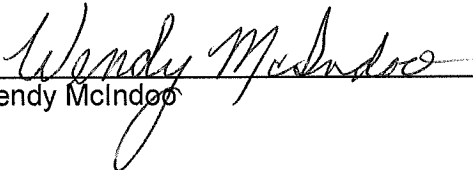
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DATED: February 28, 2011


Wendy McIndoo

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

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UE ____

In the Matter of the Application of IDAHO
POWER COMPANY for Authority to
Implement a Power Cost Adjustment
Mechanism for Electric Service to Customers
in the State of Oregon.

**2010 ANNUAL POWER SUPPLY
EXPENSE TRUE-UP**


8 In compliance with Order No. 08-238 as amended by Order No. 09-373 (hereinafter
9 "Order No. 08-238"), Idaho Power Company ("Idaho Power" or "the Company") hereby files
10 its 2010 Annual Power Supply Expense True-Up ("True-Up"), which implements the power
11 cost adjustment mechanism ("PCAM") by calculating the deviation between actual net
12 power supply expenses ("NPSE") and those expenses recovered through the Combined
13 Rate. Accordingly, Idaho Power requests that the Public Utility Commission of Oregon
14 ("Commission") issue an Order confirming that the Company has correctly calculated the
15 amount of the True-Up for later inclusion in rates as \$0.00 and confirming that the
16 Company will not add any amounts to the Annual Power Supply Expense True-Up
17 Balancing Account ("True-Up Balancing Account") for 2010. This filing is based upon the
18 following:

19 1. In Order No. 08-238, the Commission approved a PCAM for Idaho
20 Power that requires the Company to file, in February of each year, a True-Up that will
21 implement the PCAM by calculating the deviation between actual NPSE and those
22 expenses recovered through the Combined Rate. Order No. 08-238 further requires that
23 eligible power supply expense deviations will be added to the True-Up Balancing Account
24 at the end of each 12 month period ending December along with 50 percent of the annual
25 interest calculated at the Company's authorized cost of capital. The required calculations
26 are detailed in the Stipulation attached as Exhibit A to Order No. 08-238.

1 2. As described in the Testimony of Courtney Waites, filed herewith,
2 Idaho Power has calculated its True-Up in accordance with methodology approved by the
3 Commission in Order No. 08-238, and has determined that the amount of \$0.00 should be
4 added to the True-Up Balancing Account because the Oregon Allocated Power Cost
5 Deviation is within the deadbands as calculated using the Company's 2009 Report of
6 Operations ("ROO"). Consistent with Order No. 09-373, the Company will recalculate the
7 deadbands using the 2010 ROO as required under Order No. 09-373, and will make any
8 appropriate supplemental filings.

9 For all of the above reasons, Idaho Power requests that the Commission issue its
10 Order confirming that the Company has correctly calculated the amount of the True-Up and
11 confirming that the PCA amount of \$0.00 requires no adjustment to the True-Up Balancing
12 Account.

13 Respectfully submitted this 28th day of February, 2011.

14 McDOWELL & RACKNER PC
15 
16 Lisa F. Rackner

17 IDAHO POWER COMPANY
18 Lisa D. Nordstrom
19 Senior Attorney
20 PO Box 70
21 Boise, ID 83707
22 Attorneys for Idaho Power Company

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IN THE MATTER OF THE APPLICATION)
 OF IDAHO POWER COMPANY FOR)
 AUTHORITY TO IMPLEMENT A POWER)
 COST ADJUSTMENT TARIFF SCHEDULE)
 FOR ELECTRIC SERVICE TO)
 CUSTOMERS IN THE STATE OF)
 OREGON.)
)
 ANNUAL POWER SUPPLY EXPENSE)
 TRUE-UP)
)
 _____)

IDAHO POWER COMPANY
DIRECT TESTIMONY
OF
COURTNEY WAITES

February 28, 2011

1 **Q. Please state your name, business address, and present position with Idaho**
2 **Power Company (“Idaho Power” or the “Company”).**

3 A. My name is Courtney Waites. I am employed by Idaho Power Company as a
4 Regulatory Analyst in the Regulatory Affairs Department. My business address is 1221
5 West Idaho Street, Boise, Idaho 83702.

6 **Q. Please describe your educational background.**

7 A. In December of 1998, I received a Bachelor of Arts degree in Accounting from the
8 University of Alaska in Anchorage, Alaska. In 2000, I earned a Master of Business
9 Administration degree from Alaska Pacific University. I have attended New Mexico State
10 University’s Center for Public Utilities and the National Association of Regulatory Utility
11 Commissioners *Practical Skills for the Changing Electric Industry* conference and the
12 Electric Utility Consultants, Inc., *Introduction to Rate Design and Cost of Service Concepts*
13 *and Techniques for Electric Utilities* conference.

14 **Q. Please describe your work experience?**

15 A. I became employed with Idaho Power in December 2004 in the Accounts Payable
16 Department. In 2005, I accepted a Regulatory Accountant position in the Finance
17 Department where one of my tasks was to assist in responding to regulatory data requests
18 pertaining to financial issues. In 2006, I accepted my current position, Regulatory Analyst,
19 in the Regulatory Affairs Department. My duties as a Regulatory Analyst include providing
20 support for the Company’s various regulatory activities, including tariff administration,
21 regulatory ratemaking and compliance filings, and the development of various pricing
22 strategies and policies.

23 **Q. What is the purpose of your testimony?**

24 A. The purpose of my testimony is to describe the quantification of the Company’s
25 Annual Power Supply Expense True-Up (“True-Up Rate”), which is detailed in Order Nos.
26 08-238 and 09-373. In order to determine the True-Up Rate, I will first describe the

1 quantification of the dollar balance in the Annual Power Supply Expense True-Up
2 Balancing Account ("True-Up Balancing Account"), including the Company's proposed
3 offset from the sale of SO₂ Allowances and Renewable Energy Credits ("RECs") made
4 during the deferral year.

5 **Q. What is the True-Up Balancing Account?**

6 A. The True-Up Balancing Account is a Company account where the Power Cost
7 Adjustment ("PCA") is quantified at the end of each 12-month period ending December,
8 along with 50 percent of the annual interest calculated at the Company's authorized cost
9 of capital. Subject to an Earnings Test, the PCA is 90 percent of the amount that the
10 Oregon Allocated Power Cost Deviation is above or below the Power Supply Expense
11 Deadband.

12 **Q. How does Order No. 09-373 impact the Annual Power Supply Expense True-Up**
13 **Balancing Account?**

14 A. Order No. 09-373 clarifies which year's Results of Operations ("ROO") should be
15 relied upon in calculating the deferral deadbands and the Earnings Test components of
16 the Power Cost Adjustment mechanism. Idaho Power, the Citizen's Utility Board of
17 Oregon, and the Staff of the Public Utility Commission agreed that for its initial calculation
18 of the Annual Power Supply Expense True-Up filed in February each year, the Company
19 will use the most recent ROO report available, the ROO for the year preceding the deferral
20 period. Once the ROO report for the year of the deferral period becomes available, the
21 Company will file an updated calculation of the Annual Power Supply Expense True-Up.
22 The updated calculation is expected to occur in May of each year.

23 **Q. Have you prepared an exhibit that quantifies the initial estimate of the amount**
24 **to be added to the True-Up Balancing Account for 2010?**

25 A. Yes. Exhibit 101 is the Company's quantification of the net power supply expenses
26 to be trued-up for 2010.

1 **Q. Please describe Exhibit 101 and the Company's quantification of the estimated**
2 **amount to be included in the True-Up Balancing Account.**

3 A. In Exhibit 101, the columns detail the monthly and year-to-date deviations between
4 actual net power supply expenses incurred and the power costs collected through rates.
5 The last column represents the annual amounts used in determining the amount to be
6 included in the True-Up Balancing Account.

7 **Q. Please describe the calculations used to determine the amount to be included**
8 **in the True-Up Balancing Account.**

9 A. First, the Actual Unit Cost is calculated.

10 **Q. How is the Actual Unit Cost calculated?**

11 A. The Actual Unit Cost for net power supply expenses incurred is the total Actual Net
12 Power Supply Expense ("Actual NPSE") incurred divided by the Actual Sales. The Actual
13 NPSE is determined on a system-wide basis and includes amounts booked to FERC
14 Accounts 501 (Fuel-Coal), 547 (Fuel-Gas), 555 (Purchased Power), and 447 (Sales for
15 Resale). In short, Actual NPSE is calculated by adding fuel plus purchased power less
16 off-system sales. The Actual NPSE for 2010 was \$237,074,122.78. Actual Sales for 2010
17 were 13,512,067 MWh. Dividing Actual NPSE by Actual Sales results in the Actual Unit
18 Cost of \$17.55 per MWh ($\$237,074,122.78 \div 13,512,067 \text{ MWh} = \17.55 per MWh).

19 **Q. What is the next step in the true-up calculation?**

20 A. The next step in the true-up calculation is to compare the Actual Unit Cost to the
21 Combined Rate. The Combined Rate is comprised of two components: (1) The October
22 Power Cost Update, and (2) the March Power Cost Forecast. The Combined Rate in
23 effect from January through May 2010 was \$16.04/MWh and the Combined Rate in effect
24 from June through December 2010 was \$19.38/MWh. The Combined Rate reflects the
25 Commission-approved amounts reflected in rates during the months of the true-up period.

26

1 The Annual Combined Rate, which is based on the five months of \$16.04/MWh and the
2 seven months of \$19.38/MWh, is \$18.28/MWh.

3 **Q. What is the deviation between the Actual Unit Cost and the Combined Rate for**
4 **2010?**

5 A. For 2010, the deviation between the Actual Unit Cost (\$17.55 per MWh) and the
6 Combined Rate (\$18.28 per MWh) is negative \$0.74 per MWh ($\$17.55 - \$18.28 = (\$0.74)$
7). This amount is multiplied by the Actual Sales (13,512,067 MWh) to determine the
8 deviation from the forecast on a system-wide basis, or negative \$9,987,363.76.

9 **Q. How is the Oregon jurisdictional portion of the deviation from the forecast on a**
10 **system-wide basis calculated?**

11 A. The Oregon Allocated Power Cost Deviation is calculated by multiplying the system-
12 wide deviation from the forecast by the Oregon allocation factor. The Oregon allocation
13 factor is the energy allocator used in the ROO. Currently, using the 2009 ROO, the
14 Oregon allocation factor is 4.78 percent. This results in an Oregon Allocated Power Cost
15 Deviation of negative \$477,395.99, meaning the amount of the Oregon allocated power
16 supply costs recovered in rates was greater than the actual Oregon allocated power
17 supply costs ($(\$9,987,363.76) \times 4.78\% = (\$477,395.99)$).

18 **Q. You stated earlier that as a result of Order No. 09-373 you will use the previous**
19 **year's ROO to calculate the Annual Power Supply Expense True-Up filed in**
20 **February, but once the ROO for the year of the deferral is available, you will update**
21 **the calculation of the Annual Power Supply Expense True-Up. Will the Oregon**
22 **Allocated Power Cost Deviation change?**

23 A. If the Oregon allocation factor in the 2010 ROO is different than the Oregon
24 allocation factor in the 2009 ROO, then the Oregon Allocated Power Cost Deviation will
25 change.

26

1 **Q. Is the Oregon Allocated Power Cost Deviation of negative \$477,395.99 the**
2 **amount of dollars to be added to the True-Up Balancing Account?**

3 A. No. Once the Oregon Allocated Power Cost Deviation is calculated, a Power Supply
4 Expense Deadband is applied.

5 **Q. Please explain how the Power Supply Expense Deadband is applied.**

6 A. The Power Supply Expense Deadband is based upon the Company's authorized
7 ROE from its last general rate case and the rate base measured on an Oregon basis from
8 the most recent Oregon ROO report. The Oregon Allocated Power Cost Deviation is
9 compared to the positive and/or negative deadbands. A positive deviation (Actual NPSE
10 greater than those recovered through the Combined Rate) constitutes an excess power
11 supply expense. This expense is first reduced by a deadband that is the dollar equivalent
12 of 250 basis points of ROE (Oregon basis). A negative deviation (Actual NPSE less than
13 those recovered through the Combined Rate) is a power supply expense savings. This
14 savings is reduced by a deadband that is the dollar equivalent of 125 basis points of ROE
15 (Oregon basis).

16 **Q. Order No. 10-191 approved a revenue requirement stipulation that resulted in a**
17 **one-time modification to the Power Supply Expense Deadband. Has that**
18 **modification been included in the calculation of the deadbands?**

19 A. Yes. The Power Supply Expense Deadband calculation includes an increase to the
20 Upper Deadband of \$153,650 and a reduction of \$153,650 to the Lower Deadband.
21 Please see Exhibit 102 for a detail of this calculation.

22 **Q. What are the deadbands used for the calendar year 2010?**

23 A. Using the Company's authorized ROE from its last general rate case and the
24 Company's Oregon rate base of \$113,005,175, the Upper Deadband of 250 Basis Points
25 plus the one-time modification equals \$2,375,850.66 and the Lower Band of 125 Basis
26 Points plus the one-time modification equals negative \$957,450.33.

1 **Q. Will the deadbands change as a result of the 2010 ROO?**

2 A. Yes, they will. A final determination of the deadbands will be made once the 2010
3 ROO is available.

4 **Q. Based upon the initial estimate of deadbands, what is the amount of the net
5 power supply expense deviation to be added to the True-Up Balancing Account for
6 the calendar year 2010?**

7 A. The amount of the Oregon Allocated Power Cost Deviation, negative \$477,395.99, is
8 less than the Lower Deadband of negative \$957,450.33. Therefore, the dollar amount to
9 be considered to add to the True-Up Balancing Account is zero.

10 **Q. Once the deferral is calculated, an Earnings Test must be applied. Has the
11 Company performed the Earnings Test?**

12 A. No.

13 **Q. Why was an Earnings Test not performed?**

14 A. Order No. 08-238 states that before any amounts of a deferral are approved for
15 inclusion in the Annual Power Supply Expense True-Up Balancing Account for subsequent
16 recovery or refund, the Commission will apply an earnings test. Since the Company is not
17 proposing any deferral amounts be added to the Annual Power Supply Expense True-Up
18 Balancing Account, the Company was not required to perform an Earnings Test.

19 **Q. In previous years the Company has proposed to offset its Oregon Allocated
20 Power Cost Deviation by the sale of SO₂ Allowances made during the deferral year.
21 Were any sales of SO₂ Allowances made during the calendar year 2010?**

22 A. Yes. The total customer benefit of SO₂ Allowance sales made in 2010 was
23 \$23,975.40 (see Exhibit 103). Adding this amount to the Oregon Allocated Power Cost
24 Deviation of negative \$477,395.99 creates a deviation of negative \$501,371.39. This
25 amount is still less than the Lower Deadband of negative \$957,450.33; therefore, the
26

1 amount to be added to the True-Up Balancing Account is still zero. Again, no Earnings
2 Test is required.

3 **Q. In Idaho Power's Application Requesting Approval of the Sale of Renewable**
4 **Energy Credits the Company requested to treat the sale of RECs similar to the**
5 **treatment of its SO₂ Allowance sales and offset the Oregon Allocated Power Cost**
6 **Deviation with proceeds. Did the Company sell any RECs in 2010?**

7 A. Yes.

8 **Q. What is the total customer benefit associated with the sale of RECs in 2010?**

9 A. Using the same methodology to calculate the proceeds from the sale of RECs as
10 the calculation of the proceeds from the sale of SO₂ Allowances, the total customer benefit
11 is \$195,265.21 (see Exhibit 104). Adding this amount to the Oregon Allocated Power Cost
12 Deviation of negative \$501,371.39 creates a deviation of negative \$696,636.60, which is
13 still less than the Lower Deadband of negative \$957,450.33. The amount to be added to
14 the True-Up Balancing Account is still zero and an Earnings Test is not required.

15 **Q. You indicated the Company filed an Application Requesting Approval of the**
16 **Sale of Renewable Energy Credits and have treated the proceeds from the sale of**
17 **RECs based on your proposal in this Application. Has the Company received an**
18 **Order from the Commission regarding the treatment of the proceeds from the sale**
19 **of RECs?**

20 A. No. The Company will make any necessary adjustments to the calculation of the
21 Oregon Allocated Power Cost Deviation once an Order is received regarding the treatment
22 of the proceeds from the sale of RECs.

23 **Q. Does this conclude your testimony?**

24 A. Yes it does.

25

26

Idaho Power/101
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Direct Testimony of Courtney Waites

Oregon PCAM Quantification
January 2010 through December 2010

February 28, 2011

Idaho Power/101
Waites/1

2010 PCAM
Twelve Months Ended December 31, 2010

OREGON PCAM (Schedule 56)		January	January YTD	February	February YTD	March	March YTD	April	April YTD	May	May YTD	June	June YTD
ACTUAL POWER COSTS													
Actual NPSE Costs													
Actual Sales - Includes Unbilled	MWh	1,137,078	1,137,078	967,633	2,104,711	1,004,497	3,109,208	958,553	4,067,761	1,026,641	5,094,402	1,141,540	6,235,942
Fuel	\$	12,535,411.24	12,535,411.24	12,195,707.22	24,731,118.46	12,286,885.55	37,018,004.01	9,959,868.64	46,977,872.65	9,592,223.47	56,570,096.12	7,873,723.03	64,443,819.15
Purchased Power	\$	4,543,513.12	4,543,513.12	4,106,134.58	8,649,647.70	3,157,904.35	11,807,552.05	3,331,252.68	15,138,804.73	2,503,615.32	17,642,420.05	8,647,474.15	26,289,894.20
Avoided Energy-Oregon Solar Pilot													
Surplus Sales	\$	(11,004,934.80)	(11,004,934.80)	(12,553,413.52)	(23,558,348.32)	(9,327,440.29)	(32,885,788.61)	(4,478,009.62)	(37,363,798.23)	(8,214,378.35)	(45,578,176.56)	(4,500,060.30)	(50,078,236.88)
Total Non-QF	\$	6,073,989.56	6,073,989.56	3,748,428.28	9,822,417.84	6,117,349.61	15,939,767.45	8,813,111.70	24,752,879.15	3,881,460.44	28,634,339.59	12,021,136.88	40,655,476.47
QF - Includes Net Metering	\$	3,692,431.12	3,692,431.12	2,757,714.31	6,450,145.43	2,988,766.92	9,438,912.35	4,344,018.38	13,782,930.73	7,831,894.09	21,414,824.82	8,184,416.48	29,599,241.30
Total Actual Power Costs Incurred	\$	9,766,420.68	9,766,420.68	6,506,142.59	16,272,563.27	9,106,116.53	25,378,579.80	13,157,130.08	38,535,809.88	11,513,354.53	50,049,164.41	20,205,553.36	70,254,717.77
Actual Power Cost per Unit	\$/MWh	\$8.59	\$8.59	\$6.72	\$7.73	\$9.07	\$8.16	\$13.73	\$9.47	\$11.21	\$9.82	\$17.70	\$11.27
POWER COSTS COLLECTED IN RATES													
Actual Sales	MWh	1,137,078	1,137,078	967,633	2,104,711	1,004,497	3,109,208	956,553	4,067,761	1,026,641	5,094,402	1,141,540	6,235,942
Combined Rate (Recoverd in Rates)	\$/MWh	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.69
Total Power Costs Collected in Rates	\$	18,238,731.12	18,238,731.12	15,520,833.32	33,759,564.44	16,112,131.88	49,871,696.32	15,376,190.12	65,246,886.44	16,467,321.64	81,714,208.08	22,351,353.20	104,065,561.28
CHANGE FROM FORECAST													
Actual Power Cost per Unit	\$/MWh	\$8.59	\$8.59	\$6.72	\$7.73	\$9.07	\$8.16	\$13.73	\$9.47	\$11.21	\$9.82	\$17.70	\$11.27
Combined Rate (Recoverd in Rates)	\$/MWh	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.04	\$16.69	\$16.69
Actual Increase (Decrease) Over Forecast Rate	\$/MWh	(\$7.45)	(\$7.45)	(\$9.32)	(\$8.31)	(\$6.97)	(\$7.88)	(\$2.31)	(\$6.57)	(\$4.83)	(\$6.22)	(\$1.88)	(\$5.42)
Deviation from Forecast	\$	(8,472,310.44)	(8,472,310.44)	(9,014,660.73)	(17,467,001.17)	(7,906,016.35)	(24,493,016.52)	(2,216,069.04)	(26,711,076.56)	(4,953,967.11)	(31,665,043.67)	(2,145,799.84)	(33,810,843.51)
Oregon Allocation	%		4.78%		4.78%		4.78%		4.78%		4.78%		4.78%
Oregon Allocated Power Cost Deviation (before DI)	\$		(404,976.44)		(835,878.65)		(1,170,766.19)		(1,276,789.46)		(1,513,589.09)		(1,616,156.32)
Deadband - Over 250 Basis Points	\$		2,375,850.66		2,375,850.66		2,375,850.66		2,375,850.66		2,375,850.66		2,375,850.66
Deadband - Under 125 Basis Points	\$		(957,450.33)		(957,450.33)		(957,450.33)		(957,450.33)		(957,450.33)		(957,450.33)
True-Up (+)	\$		0.00		0.00		0.00		0.00		0.00		0.00
True-Up (-)	\$		0.00		0.00		(213,315.86)		(319,339.13)		(556,138.76)		(658,707.99)
OREGON DEFERRAL before sharing	\$		0.00		0.00		(213,315.86)		(319,339.13)		(556,138.76)		(658,707.99)
Portion of True-up Change Allowed	%		90%		90%		90%		90%		90%		90%
OREGON DEFERRAL w/ SHARING (90/10)	\$		0.00		0.00		(193,918.76)		(287,405.22)		(508,524.88)		(592,837.19)
Interest Rate	%		7.830%		7.830%		8.061%		8.061%		8.061%		8.061%
Interest Accrued to date	\$		0.00		0.00		(1,934.48)		(3,861.29)		(8,405.69)		(11,947.15)
Total Deferred Balance	\$		0.00		0.00		(193,918.76)		(291,266.51)		(508,930.57)		(604,784.34)

Idaho Power/102
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Direct Testimony of Courtney Waites

Determination of Power Supply Expense
Based on Idaho Power 2009 Results of Operation

February 28, 2011

**Determination of Oregon PCAM Deadbands
 Based on Idaho Power 2009 Results of Operations**

	(A)	(B)
	Total System	Oregon
(1) Rate Base	\$2,334,974,334	\$113,005,175
(2) % Equity in cap structure	47.904%	47.904%
(3) Equity in rate base	\$1,118,546,105	\$54,133,999
(4) 100 basis points	1.000%	1.000%
(5) Resulting return (NOI Effect)	\$11,185,461	\$541,340
(6) Net-to Gross Factor	1.64200	1.64200
(7) Revenue requirement	\$18,366,527	\$ 888,880
(8) Upper Band of Basis Points	250	\$2,222,200.66
(9) Lower Band of Basis Points	125	(\$1,111,100.33)
(10) Upper Band w/one-time adjustment	\$153,650	\$2,375,850.66
(11) Lower Band w/one-time adjustment	\$153,650	(\$957,450.33)

Idaho Power/103
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Direct Testimony of Courtney Waites

Oregon Emission Sales
January 2010 through December 2010

February 28, 2011

Idaho Power/104
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Direct Testimony of Courtney Waites

Oregon Renewable Energy Credit
January 2010 through December 2010

February 28, 2011

