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## VIA ELECTRONIC FILING

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Public Utility Commission of Oregon  
PO Box 2148  
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**Re: Docket LC 50**

Enclosed for filing in the above referenced docket are an original and one copy of Idaho Power Company's Response to Intervenor and Public Comments in its 2009 Integrated Resource Plan.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in black ink that reads "Wendy McIndoo". The signature is written in a cursive style.

Wendy McIndoo  
Legal Assistant

Enclosures  
cc: Service List

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing documents on  
in Docket LC 50 on the following named persons on the date indicated below by e-mail  
addressed to said persons at his or her last-known address indicated below.

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DATED: May 19, 2010

  
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **LC 50**

4 In the Matter of Idaho Power Company's  
5 2009 Integrated Resource Plan

**IDAHO POWER COMPANY'S RESPONSE  
TO INTERVENOR AND PUBLIC  
COMMENTS IN ITS 2009 INTEGRATED  
RESOURCE PLAN**

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8 Pursuant to the Administrative Law Judge's Memorandum dated March 5, 2010,  
9 Idaho Power Company ("Idaho Power" or "Company") hereby files its response to the  
10 intervenor and public comments on its 2009 Integrated Resource Plan ("IRP" or "2009  
11 IRP"). Specifically, the following comments respond to the written and oral comments  
12 provided by intervenors and members of the public at the Public Hearing conducted by the  
13 Public Utility Commission of Oregon ("Commission") in Ontario, Oregon on April 20, 2010,  
14 and the written comments filed by Renewable Northwest Project ("RNP") on that same  
15 day.

16 **I. INTRODUCTION**

17 Aside from the limited concerns voiced by RNP, all of the comments received by the  
18 Commission regarding the Company's 2009 IRP came from members of the public who  
19 attended the April 20, 2010, Ontario Public Hearing. The majority of these persons  
20 identified themselves as members of intervenor Stop Idaho Power ("SIP") or Move Idaho  
21 Power ("MIP")—two organizations dedicated to halting or rerouting the Boardman to  
22 Hemingway Transmission Project ("B2H") included in the 2009 IRP preferred portfolio.  
23 Others commenters identified as private citizens.<sup>1</sup> The primary concern voiced by all of  
24 these commenters the need for and impact of B2H. Specifically, these commenters

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26 <sup>1</sup> In addition, one commenter at the Public Hearing identified himself as a member of an historic preservation organization.

1 suggest that the Company overstates future loads, understates future committed  
2 resources, and could better satisfy future deficiencies with resources other than B2H. In  
3 addition, the commenters argue that Idaho Power's plans to build B2H are motivated by a  
4 desire for shareholder profits, and that in fact B2H will not benefit Oregon residents. While  
5 Idaho Power appreciates the participation of all commenters, analysis shows that their  
6 concerns are not well founded.

- 7 • *First*, the load forecast used in Idaho Power's IRP is sound. It is based on  
8 careful research and up-to-date data and is actually conservative when  
9 compared with the load forecast produced by the Northwest Power and  
10 Conservation Council ("NPCC").
- 11 • *Second*, the existing and committed resources within the IRP are correctly  
12 represented.
- 13 • *Third*, none of the alternative approaches to serving the Company's projected  
14 load suggested by the intervenors and members of the public are viable or  
15 cost effective substitutes for B2H.
- 16 • *Fourth*, the Company's need to build out its system in order to accommodate  
17 wheeling requests is legitimate. There is no basis in fact for the commenters'  
18 accusations that the Company is motivated to build B2H by a desire to  
19 generate wheeling revenues that will result in shareholder profits.
- 20 • *Finally*, the Commission should reject the commenters' suggestions that B2H  
21 will not benefit Oregonians and that regional concerns are not relevant to the  
22 need for B2H. In fact, B2H will benefit Oregonians both directly, by  
23 supporting increased load in Idaho Power's Oregon service area, and  
24 indirectly by adding strength and flexibility to the regional transmission  
25 system.

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1 **II. DISCUSSION**

2 **A. Idaho Power's Load Forecast is Sound**

3 **1. General Background on Load Forecast—Structure and Methodology.**

4 Idaho Power's IRP represents the Company's primary planning process for carrying  
5 out its mission of delivering safe, reliable, and cost effective electricity to its customers.

6 Four primary goals are central to its preparation:

- 7 1. Identify sufficient resources to reliably serve the growing demand for energy  
8 within Idaho Power's service area throughout the 20 year planning period.
- 9 2. Ensure the selected resource portfolio balances cost, risk, and environmental  
10 concerns.
- 11 3. Give equal and balanced treatment to both supply-side resources and  
12 demand-side measures.
- 13 4. Involve the public in the planning process in a meaningful way. In fulfillment  
14 of this last goal the Company works closely with the IRP Advisory Council  
15 (IRPAC), comprised of major stakeholders representing the environmental  
16 community, major industrial customers, irrigation customers, state legislators,  
17 public utility commission representatives, and others. The IRPAC generally  
18 meets monthly during the development of the IRP and the meetings are open  
19 to the public.

20 Clearly, a reliable load forecast is central to accomplishing the first of these goals.  
21 Without an accurate estimate of future demand, the Company cannot determine the  
22 resources it will need. Accordingly Idaho Power applies a rigorous process for developing  
23 the load forecasts used in the IRP.

24 In constructing the load forecast Idaho Power develops independent forecasts for  
25 each of the major customer classes: residential, commercial, irrigation, and industrial.  
26 Individual forecasts are also developed for Idaho Power's special contract customers

1 (greater than 25 MW) that are then combined into a single forecast category labeled  
2 "Additional Firm Load."

3 The peak-hour load forecast is prepared in conjunction with the average load  
4 forecast. Idaho Power has two distinct peak periods: a winter peak, resulting from space  
5 heating demand that normally occurs in December, January, or February, and a larger  
6 summer peak that normally occurs in June or July. The summer peak generally occurs  
7 when extensive air conditioning usage coincides with significant irrigation demand.

8 Peak loads are forecast using 12 regression equations and are a function of  
9 temperature, space heating saturation (winter only), air conditioning saturation (summer  
10 only), historical average load, and precipitation (summer only). The peak forecast uses  
11 statistically derived peak day temperatures based on the most recent 30 years of climate  
12 data for each month. Peak loads for special contract customers are forecast based on  
13 historical analysis and contractual considerations.

14 The primary exogenous factors in the forecast are macroeconomic and demographic  
15 data. Moody's Analytics independently develops and provides the macroeconomic drivers  
16 used to prepare the load forecast. National, state, and county economic and demographic  
17 projections are tailored to Idaho Power's service area using an in-house economic  
18 database developed by an outside consultant. Specific demographic projections are also  
19 developed for the service area from national and local census data.

20 The initial load forecast for the 2009 IRP was completed in August 2008 and Idaho  
21 Power continued to perform the analytical work required to complete the IRP through the  
22 fall and winter of 2008. As work on the IRP continued, the national recession continued to  
23 worsen. By the spring of 2009, IRPAC members expressed concerns that the IRP load  
24 forecast did not account for the effects of the recession. In response to those concerns,  
25 Idaho Power filed a request for an extension of the IRP submittal date with the  
26 Commission to allow the Company time to update the load forecast and account for the

1 recession. This request was granted by the Commission and the revised filing date for the  
2 IRP was extended to the end of December 2009.<sup>2</sup> The extension allowed the Company to  
3 include the most current economic data and thereby account for the effects of the recent  
4 recession.

5 **2. Comparison with the NPCC Data Shows that the IRP Load Forecast is**  
6 **Conservative.**

7 Several people argued at the Public Hearing that the load forecast contained in the  
8 NPCC's Sixth Power Plan demonstrates that Idaho Power's load forecast is unrealistically  
9 aggressive.<sup>3</sup> However, a careful analysis of the NPCC data shows that the IRP load  
10 forecast is actually conservative.

11 At the outset, it must be noted that the NPCC's forecast for the state of Idaho  
12 includes the entire state while Idaho Power's IRP load forecast covers only Idaho Power's  
13 service area—of which approximately 95 percent is in Idaho and 5 percent is in Eastern  
14 Oregon. Therefore, the load volumes are not directly comparable. However, the general  
15 *trends* of each forecast *can* be compared and contrasted, and these trends show the  
16 conservative nature of the IRP forecast. Figure 1, shown below, illustrates the 20-year  
17 expected case average load forecast for the state of Idaho prepared by the NPCC and the  
18 expected case average load forecast used in the 2009 IRP (for loads in the Company's  
19 service area).

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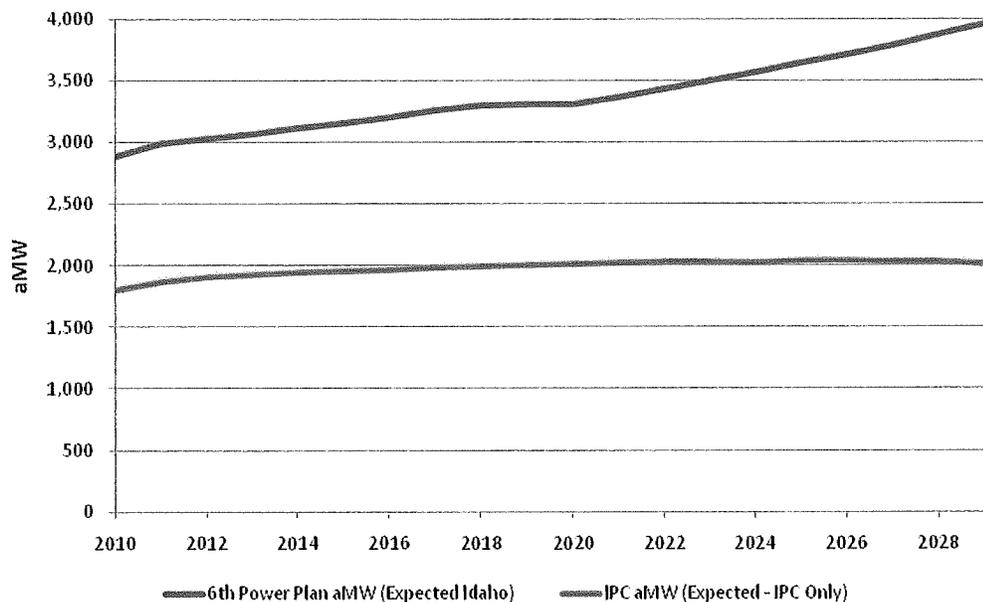
25 <sup>2</sup> *Re Idaho Power Compnay*, Docket UM 1428, Order No. 09-183 (May 26, 2010) (granting Idaho  
Power's request for extension of time to file 2009 IRP).

26 <sup>3</sup> Tr. 21:18 – 25:7 (Kennington); Tr. 58:23 – 60:5 (Williams).

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**Figure 1**

**2009 IRP Average Energy Load Forecast Comparison**

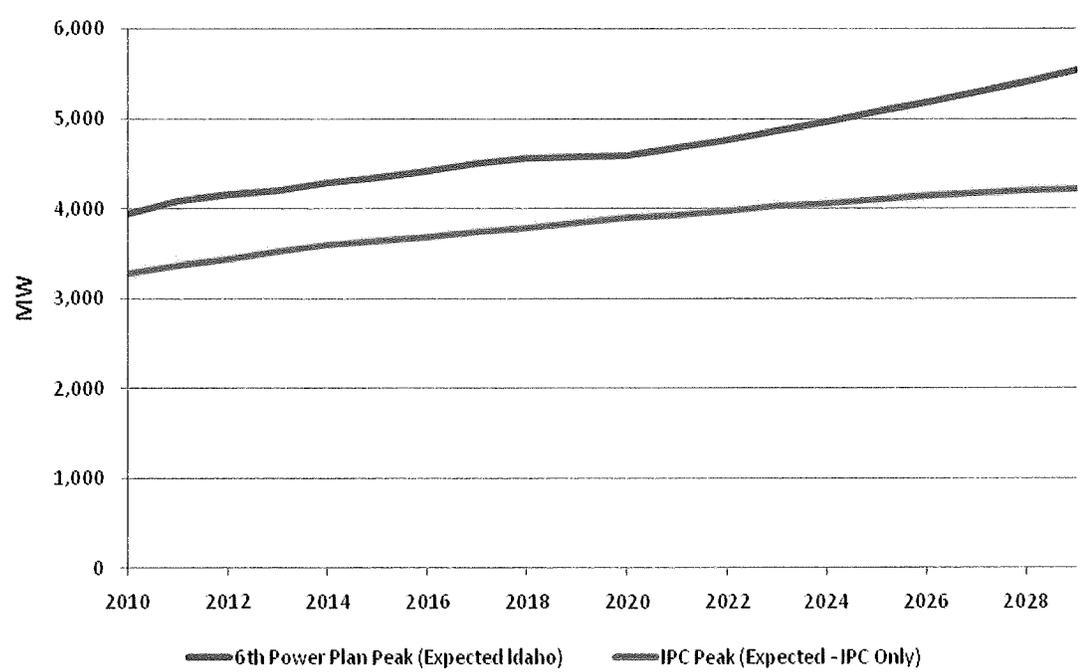


Idaho Power's IRP forecast is lower than the NPCC forecast because the IRP forecast includes load only in Idaho Power's service area. From 2010 through 2020, the load forecast used in the 2009 IRP increases at a slightly lower rate than the growth shown in the NPCC forecast. From 2020 through 2029, the IRP load forecast shows little growth in average loads, due primarily to assumptions regarding the price elasticity impact of carbon regulation.

A comparison of the peak-hour forecasts yields similar results. As shown in Figure 2 below, the NPCC's forecast growth trend for peak-hour load from 2010 through 2020 is almost identical to Idaho Power's IRP forecast. From 2020 through 2029, Idaho Power's peak-hour forecast grows significantly less than the NPCC forecast, again due primarily to carbon regulation assumptions.

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**Figure 2**  
**2009 IRP Peak-Hour Load Forecast Comparison**



When comparing the 20-year periods in each forecast, the NPCC average load forecast grows at an annual average rate of 1.96 percent and Idaho Power's forecast grows at 0.64 percent. For peak-hour, the NPCC forecast grows at an annual average rate of 2.13 percent and Idaho Power's forecast grows at 1.5 percent. In both cases, Idaho Power's forecast growth rate is conservative when compared to the NPCC forecast. The data used to prepare Figures 1 and 2 is presented in Table 1.

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**Table 1 - Load Forecast Comparison Data**

<b>Year</b>	<b>NPCC Peak (State of Idaho)</b>	<b>IPC Peak (IPC Only)</b>	<b>NPCC aMW (State of Idaho)</b>	<b>IPC aMW (IPC Only)</b>
2010	3,940	3,279	2,880	1,797
2011	4,092	3,375	2,988	1,869
2012	4,155	3,447	3,029	1,906
2013	4,208	3,533	3,062	1,926
2014	4,286	3,592	3,113	1,947
2015	4,348	3,641	3,153	1,957
2016	4,415	3,689	3,197	1,967
2017	4,500	3,739	3,254	1,979
2018	4,561	3,790	3,294	1,991
2019	4,582	3,842	3,304	2,002
2020	4,595	3,895	3,309	2,013
2021	4,673	3,933	3,361	2,017
2022	4,770	3,980	3,428	2,026
2023	4,871	4,027	3,497	2,032
2024	4,971	4,052	3,566	2,024
2025	5,080	4,098	3,640	2,035
2026	5,184	4,146	3,711	2,041
2027	5,295	4,173	3,788	2,034
2028	5,411	4,204	3,868	2,030
2029	5,535	4,216	3,953	2,015
<b>Average Annual Growth Rate</b>				
	<b>2.13%</b>	<b>1.50%</b>	<b>1.96%</b>	<b>0.64%</b>

**3. Specific Criticisms of the Load Forecast Methodologies and Calculations are Without Merit.**

At the Public Hearing, two commenters, Mr. Roger Findley and Ms. Evelyn Sayers, provided specific analyses of the IRP load forecast calculation, all suggesting that the load forecast is aggressive. The Company has reviewed these criticisms and finds them to be based on a misunderstanding of the Company's methodology.

1 Mr. Findley begins his critique at the Public Hearing by pointing out that Table 3.1  
2 and Figure 3.1 in the 2009 IRP contain data only through 2008. Mr. Findley suggests that  
3 this represents an attempt on Idaho Power's part to hide information or mislead the  
4 reader.<sup>4</sup> There is there is no basis for such a conclusion. Table 3.1 and Figure 3.1 are  
5 appropriately labeled *Historical Capacity, Load and Customer Data*.<sup>5</sup> 2009 information  
6 was not yet available when the IRP was prepared.

7 Ms. Sayers' presentation begins by expressing confusion over the peak-hour load  
8 forecast data presented in Table 5.1 in the IRP.<sup>6</sup> Table 5.1 includes actual 2009 summer  
9 peak load data as this information was available prior to finalizing the IRP. Although the  
10 text presented below Table 5.1 states, "The median or expected case peak-hour load  
11 forecast predicts peak-hour load will grow from 3,160 MW in 2009 to 4,216 MW in 2029,"  
12 the line at the bottom of Table 5.1 clearly indicates the growth rate is calculated for the  
13 years 2010-2029.

14 Ms. Sayers points out that the peak-hour load and resource balance presented in  
15 Appendix C-Technical Appendix (page 123) is missing a subtotal line for the Power  
16 Purchase Agreements section beginning in the year 2017.<sup>7</sup> Idaho Power confirmed this  
17 omission, which results in an error of 15 MW in the final Monthly Surplus/Deficit calculation  
18 shown in the IRP's Appendix C-Technical Appendix. This omission was simply in the  
19 printing of the Technical Appendix and not in the analysis. The IRP analysis actually  
20 included the 15 MW; however, when the table was sent to print, the subtotal line was  
21 omitted. Idaho Power agrees with Ms. Sayers that this omission is not material to the  
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23 <sup>4</sup> Tr. 28:7 – 23 (Findley); Written Comments of Roger Findley.

24 <sup>5</sup> 2009 IRP at 24 (emphasis added).

25 <sup>6</sup> Tr. 43:18 – 44:18 (Sayers).

26 <sup>7</sup> Tr. 44:19 – 45:8 (Sayers).

1 results of the IRP; however, Idaho Power is providing a corrected version attached to its  
2 reply comments as Exhibit 1.

3 Ms. Sayers goes on to discuss a series of charts she prepared and used to support  
4 her conclusion that the B2H transmission line is not needed.<sup>8</sup> Without the underlying data  
5 used to prepare the charts, it is difficult for Idaho Power to comment on the validity of her  
6 analysis. Nonetheless, Idaho Power would like to point out that Ms. Sayers' assumption  
7 that the B2H transmission line would only serve the Treasure Valley is incorrect.<sup>9</sup> The IRP  
8 analysis is performed on a system-wide basis and the B2H transmission line would benefit  
9 all of Idaho Power's customers in Idaho and Oregon.

10 **4. Idaho Power Appropriately Included the Hoku Load in its Load Forecast.**

11 One commenter argues that the Company should not have included loads attributed  
12 to Hoku Scientific Inc. ("Hoku") in the load forecast given the Company's financial  
13 difficulties.<sup>10</sup> Idaho Power disagrees. Despite Hoku's reported financial challenges, Idaho  
14 Power continues to believe that it will be required to serve Hoku under the provisions of  
15 the current four-year energy services agreement. Hoku has recently indicated publicly that  
16 its ability to finance the continued construction of its Pocatello facility has improved  
17 following a large cash infusion provided by its new majority owner, Tianwei New Energy  
18 Holdings.

19 Idaho Power has completed construction of the substation and transmission line  
20 upgrades needed to serve Hoku's 82 MW load. As pointed out by the commenter, Hoku  
21 has made recent progress toward a fully operational polysilicon manufacturing plant. Hoku  
22 recently completed a successful demonstration of its ability to produce product at its  
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24 <sup>8</sup>Tr. 48:13 – 17 (Sayers).

25 <sup>9</sup>Tr. 48:13 – 17 (Sayers).

26 <sup>10</sup>Written Comments of Patty Kennington.

1 Pocatello facility and has paid Idaho Power for the energy used to conduct that pilot.

2 The same commenter further suggests that Idaho Power should have considered  
3 serving Hoku's load with a resource located closer to the Pocatello facility to mitigate the  
4 impacts of line losses.<sup>11</sup> Idaho Power includes the impact of line losses as a standard  
5 adjustment in its resource planning process. Idaho Power recognizes that line losses  
6 must be factored into the IRP analysis in order to appropriately compare the cost of  
7 potential resources with different locations within or outside of the Company's service  
8 territory. The B2H transmission line was identified as a viable resource to meet future load  
9 in the Company's preferred resource portfolio with the impact of line losses factored into  
10 the analysis.<sup>12</sup>

11 **5. The IRP Load Forecast Appropriately Accounts for Projected Economic**  
12 **Conditions.**

13 As discussed above, the load forecast included in the IRP was specifically updated  
14 to reflect the most recent economic conditions. Nevertheless, several commenters at the  
15 Ontario Public Hearing suggested that the load forecast painted an unduly rosy picture of  
16 the economic future of Idaho Power's service area. In particular, one commenter  
17 presented historical data regarding housing starts and suggested that these served to  
18 undermine the IRP load forecast.<sup>13</sup> However, the list of housing starts by city/county  
19 presented by the commenter represents only a partial list of cities/counties in Idaho  
20 Power's service area. And while historical and projected housing starts are considered in  
21 the preparation of the IRP load forecast, many other factors are evaluated as indicated

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23 <sup>11</sup> Written Comments of Patty Kennington.

24 <sup>12</sup> The commenter also suggests that Hoku should consider using its own product to help serve a  
25 portion of its load. This, of course, is an economic and operational decision that can be made only  
by Hoku and not by Idaho Power in its IRP.

26 <sup>13</sup> Tr. 17:8 – 19:18 (Phillips).

1 above. The relevance of this data is further diminished because housing starts primarily  
2 influence the forecast of residential load and have no significant correlation to Idaho  
3 Power's other customer classes.

4 The load forecast Idaho Power used to develop its 2009 IRP is reliable. It is the  
5 result of a sound, industry-standard methodology, and is conservative in its estimates. It  
6 includes the most up-to-date economic data available, accounts for the current economic  
7 downturn, and incorporates loads the Company reasonably expects to serve.

8 **B. The 2009 IRP Correctly Accounts For All Existing and Committed Resources.**

9 In addition to criticizing the Company's load forecasts, Mr. Findley also argues that  
10 Idaho Power understated its committed resources in the IRP. Specifically, Mr. Findley's  
11 revision of the Company's Table 10.9 *Capacity Planning Margin* is based on numerous  
12 incorrect assumptions that lead Mr. Findley to faulty conclusions about the resources  
13 included in the IRP.<sup>14</sup> The following examples of errors are illustrative but by no means  
14 exhaustive.

15 First, Mr. Findley chooses to assign a peak-hour capacity factor of 32 percent to the  
16 101 MW Elkhorn Valley Wind Project as opposed to the 5 percent Idaho Power included in  
17 Table 10.9.<sup>15</sup> The 2009 IRP assumes that new wind resources will operate at an annual  
18 average capacity factor of 32 percent. However, wind resources are assumed to operate  
19 at a capacity factor of 5 percent for peak-hour planning purposes. The use of a 5 percent  
20 peak-hour capacity factor for wind resources is a widely accepted assumption used by  
21 utilities in the Pacific Northwest.

22 Second, Mr. Findley assigns a peak-hour capacity value of 49 MW to the Shoshone  
23 Falls Upgrade Project, which is an upgrade of an existing Idaho Power hydroelectric  
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25 <sup>14</sup> Tr. 28:24 – 35:4 (Findley).

26 <sup>15</sup> Tr. 33:8 – 18 (Findley).

1 facility.<sup>16</sup> While the upgrade will provide an additional 49 MW of nameplate generation,  
2 the actual energy generated from the upgrade is dependent on the availability of water.  
3 During the summer months when Idaho Power experiences peak loads, no additional  
4 water is anticipated to be available to generate beyond the capacity of the existing plant.  
5 Therefore, Idaho Power's value of zero for this upgrade is appropriate for capacity  
6 planning purposes.

7 Finally, Mr. Findley chooses to include an additional 29 MW of capacity from wind  
8 resources that is already accounted for in the CSPP (PURPA) line item.<sup>17</sup> While there are  
9 several additional incorrect assumptions made by Mr. Findley, these examples clearly  
10 invalidate the results he presents in his comments.<sup>18</sup>

11 **C. Analysis of all Alternatives Shows that B2H Should Be Included in the**  
12 **Preferred Portfolio.**

13 **1. Forecasts of Impacts of Demand-Side Management Efforts on Load**  
14 **Indicates That They Will Not Be Sufficient to Replace B2H.**

15 Several commenters take the position that the Company could obviate the need for  
16 B2H with increased demand-side management ("DSM")<sup>19</sup> efforts.<sup>20</sup> Similarly, a number of  
17 these commenters allege that Idaho Power has been deficient in seeking energy savings  
18 to date.<sup>21</sup> Both of these suggestions are unsupported by the facts.

19 First, it would not be possible for the Company to displace the need for B2H by  
20 increasing its efforts to save energy. In Idaho Power's IRP analysis, cost-effective energy

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20 <sup>16</sup> Tr. 31:10 – 13 (Findley).

21 <sup>17</sup> Tr. 31:14 – 17 (Findley).

22 <sup>18</sup> Tr. 35:1 – 4 (Findley).

23 <sup>19</sup> At various times commenters refer to conservation, energy efficiency, and/or demand-response  
24 programs. Each of these are components of the Company's overall DSM program.

25 <sup>20</sup> See e.g., Written Comments of Evelyn Sayers.

26 <sup>21</sup> Tr. 39:3 – 15 (Penn).

1 efficiency and demand response are the first resources considered in the process. That  
2 is, prior to evaluating the need for traditional resources, including the B2H transmission  
3 line, all energy efficiency from existing programs and potential new cost-effective  
4 programs are removed from the load and resource balance that identifies future supply  
5 deficits. Under this approach, the Company ensures that first priority is given to all  
6 reasonably obtainable energy efficiency and demand response resources. Therefore,  
7 energy efficiency cannot replace the need for the B2H transmission line as all achievable  
8 potential energy savings have already been included in the plan as a fully committed  
9 resource.

10 Similarly, suggestions that the Company's DSM efforts have been deficient are  
11 without merit. One commenter in particular points out that Idaho Power's energy efficiency  
12 efforts lag behind the regional goals established by the NPCC's Sixth Power Plan and the  
13 achievements of its neighboring utilities in Washington and Oregon.<sup>22</sup> The facts, however,  
14 establish that Idaho Power's DSM activities have been appropriate and successful.

15 First, it is incorrect to suggest that Idaho Power is not meeting NPCC's conservation  
16 goals. The fact is that in 2009 the Company exceeded the goals contained in the Fifth  
17 Plan by approximately 30%, and is working aggressively to meet the goals set in the Sixth  
18 Plan. Specifically with respect to the Sixth Plan, Idaho Power worked closely with the  
19 NPCC in its development, in which a range of energy savings potential is identified and  
20 which includes a "regional check in" with appropriate target adjustments after two years  
21 due to the uncertainty surrounding the achievability of energy savings potential as laid out  
22 in the plan.<sup>23</sup>

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23 <sup>22</sup> Tr. 39:3 – 15 (Penn).

24 <sup>23</sup> The NPCC's methodology of forecasting conservation varies from Idaho Power's methods. In the  
25 IRP process, Idaho Power only includes energy savings potential from its existing incentive based  
26 programs and anticipated potential from programs and measures that are cost-effective, market  
ready, and readily available. The Council did not forecast potential demand savings from demand  
response programs from which Idaho Power obtains substantial peak reduction and on which Idaho  
Power spends considerable resources.

1 With regard to the allegation that Idaho Power has displaced 6 percent of retail load  
2 with energy efficiency while “other utilities” have displaced between 13 percent and 18  
3 percent,<sup>24</sup> Idaho Power does not know the source of these data. The Company contacted  
4 representatives from the NPCC in an attempt to validate the load displacement percentage  
5 numbers provided by the commenters. Council representatives involved with the  
6 preparation of the Sixth Power Plan were unable to reconcile the numbers with any of the  
7 Council’s data or to validate the numbers in any way.

8 According to the U.S. Energy Information Administration “Annual Electric Power  
9 Industry Report for 2008”<sup>25</sup> Idaho Power was ranked sixth out of fifteen investor-owned  
10 utilities in the Western Electric Coordinating Council with energy savings accounting for  
11 0.95 percent of retail energy sales. The range of annual percentage of savings varied  
12 from one company experiencing energy savings of 3.46 percent of annual retail savings to  
13 three utilities reporting no savings from energy efficiency.

14 The Company’s success in DSM has been particularly strong. The Idaho Public  
15 Utilities Commission (“IPUC”) recently found that Idaho Power had been “aggressively  
16 pursuing cost-effective demand-side management (DSM) options . . .” and that it had  
17 implemented such programs as reasonably as possible.<sup>26</sup>

18 The Company is firmly committed to pursuing all cost-effective DSM and is on the  
19 record in numerous proceedings in front of both the Idaho and Oregon Commissions  
20 stating this position. The Company’s commitment is evidenced by its accomplishments  
21 from 2002 through 2009. Idaho Power’s average annual increase in DSM investments  
22 since 2002 has been 50 percent while energy savings have averaged an increase of 40

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24 <sup>24</sup> Tr. 39:6 – 8 (Penn).

25 <sup>25</sup> Survey Form EIA-861

26 <sup>26</sup> *Re Idaho Power Company*, Case No. IPC-E-09-03, Order No. 30892 at 22 (Sept. 1, 2009).

1 percent annually. In 2009 Idaho Power’s demand response programs decreased peak  
2 load by 218 MW, which is greater than the capacity of any of Idaho Power’s gas-fired  
3 peaker plants and is equivalent to 7 percent of Idaho Power’s all time system summer  
4 peak.

5 With the addition of new demand response programs and the modification of some  
6 existing programs, the 2009 IRP anticipates DSM programs will reduce peak-hour loads  
7 by 398 MW in the summer of 2015 when the B2H line is expected to be in-service. This  
8 level of load reduction is accounted for in the IRP load and resource balance. As  
9 previously pointed out, the IPUC considers Idaho Power’s DSM efforts to be aggressive.  
10 The suggestion that the Company could displace B2H with additional energy savings—not  
11 already contemplated in the IRP—is undercut by the sheer magnitude of the savings that  
12 would be required.

13 **2. Building an Additional Gas Plant Is Not a Viable or Cost Effective**  
14 **Alternative to B2H.**

15 At the Public Hearing in Ontario on April 20, 2010, numerous comments were made  
16 indicating Idaho Power should pursue building additional natural gas resources as  
17 opposed to building the B2H transmission line.<sup>27</sup> The 2009 IRP addressed this option by  
18 analyzing portfolio 1.2 Gas Peaker. In Idaho Power’s presentation to the Commission on  
19 February 23, 2010, the Company included the tipping point chart shown in Figure 3 below  
20 to present a direct comparison of the natural gas portfolio to the B2H portfolio.

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26 <sup>27</sup> See e.g., Tr. 8: 9 – 15 (Marlette); Tr. 26:7 -9 (Faw); Tr. 52:11 – 16 (Pearson).

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**Figure 3**

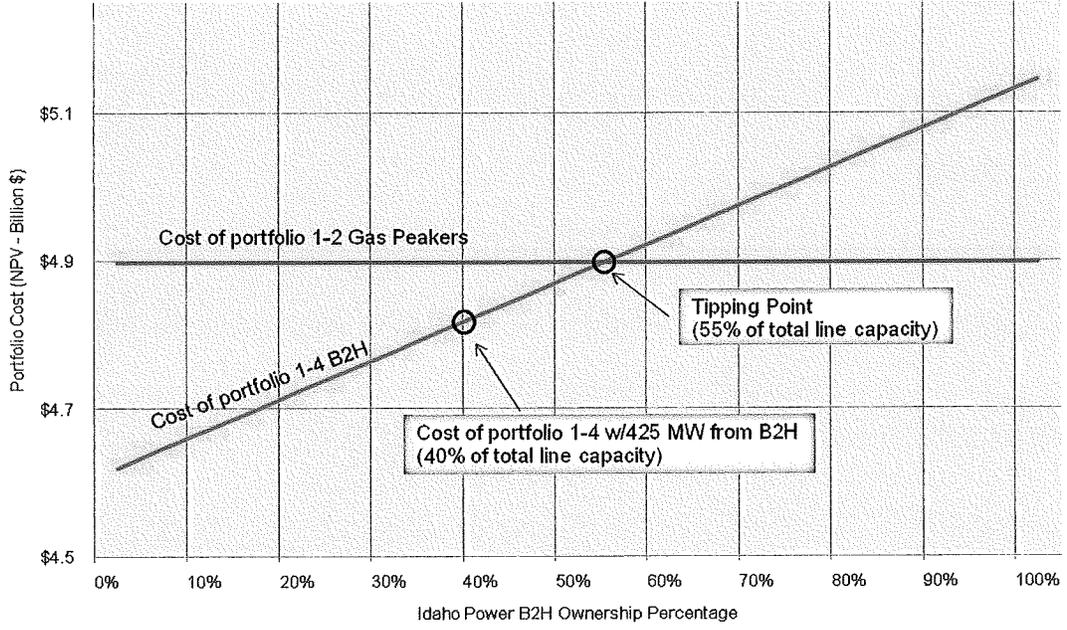


Figure 3 shows portfolio 1-4 B2H out-performed portfolio 1-2 Gas Peakers based on Idaho Power taking a 40 percent ownership share in the B2H line. The “tipping point” presented in Figure-3 indicates Idaho Power could take up to a 55 percent ownership share in the B2H line before the cost of the two portfolios would be the same. Figure 3 is the basis for Idaho Power including portfolio 1-2 Gas Peakers as an alternate portfolio in the 2009 IRP (see Table 10.5, page 116, 2009 IRP) in the event third party interest in the B2H line does not materialize as expected. Subsequent to the preparation and filing of the IRP, Idaho Power and PacifiCorp entered into an agreement to negotiate the joint ownership and development of the B2H line. A summary of this agreement is publicly available on Idaho Power’s Open Access Same-time Information System (“OASIS”) website.<sup>28</sup> This agreement and partnership increased confidence that actual third-party interest in the B2H line will materialize as set forth in the “tipping point” analysis of the IRP and confirms the inclusion of the B2H line in the Company’s preferred resource portfolio.

<sup>28</sup> <http://www.oatioasis.com/ipco/>

1 In response to Staff's Data Request 16, which is attached as Exhibit 2, Idaho Power  
2 presented additional results regarding this tipping point chart. The response included the  
3 addition of different cost scenarios for both portfolio 1-2 Gas Peaker and portfolio 1-4 B-H.

4 **3. Purchased Power is Not a Viable or Cost Effective Alternative to B2H.**

5 At least one commenter argued that the B2H project could be avoided through  
6 additional purchased power.<sup>29</sup> Idaho Power agrees that power purchases are an important  
7 and cost-effective component of the Company's preferred resource plan. However, the  
8 logic in the suggestion that B2H could be avoided through increased power purchases is  
9 seriously flawed. The primary purpose of the B2H line is to provide the Company with the  
10 additional transmission capacity that will be necessary to import power from the Pacific  
11 Northwest power market. Currently, Idaho Power does not have adequate transmission  
12 capacity to increase its on-peak power purchases on the western side of its system. B2H  
13 is the most cost-effective and viable option for Company to access the Northwest power  
14 market. Further, purchasing power from the eastern side of Idaho Power's system is not a  
15 viable alternative to B2H because of the lack of liquidity in the east-side markets and the  
16 long-term risk of price escalation.

17 **D. Company's Need to Build to Accommodate Wheeling Requests is Legitimate.**

18 One of the commenters argued that the Company has no obligation to accommodate  
19 wheeling requests by third parties and that such requests cannot serve to justify the need  
20 for B2H.<sup>30</sup> This position is incorrect.

21 Federal law requires Idaho Power to provide wheeling services on a non-  
22 discriminatory basis and this requires the construction of a transmission system that  
23 ensures reliable and economic service to transmission customers.<sup>31</sup> Toward this end, the

24 <sup>29</sup> Tr. 47:6 – 15 (Sayers).

25 <sup>30</sup> Tr. 14:18 – 22 (Findley).

26 <sup>31</sup> See 16 U.S.C. § 824d and 824e; *Promoting Wholesale Competition Through Open Access Non-Discriminatory Transmission Services by Public Utilities; Recovery of Stranded Costs by Public*

1 Federal Energy Regulatory Commission (“FERC”) adopted a *pro forma* Open Access  
2 Transmission Tariff (“OATT”) that includes terms and conditions for non-discriminatory  
3 transmission service.<sup>32</sup> Utilities must provide access to their systems pursuant to their  
4 OATTs and must also take transmission service for its own wholesale sales and purchase  
5 of electricity under the same tariffs.<sup>33</sup> This ensures that utilities cannot discriminate in  
6 favor of their resources by limiting access to their transmission system by other  
7 transmission customers.<sup>34</sup>

8 FERC has found, however, that providing access to the transmission system on  
9 uniform terms and conditions is insufficient to ensure nondiscrimination. Specifically,  
10 FERC has noted that the ability and incentive to discriminate increases as the  
11 transmission system becomes more congested.<sup>35</sup> In light of this concern and coupled with  
12 its conclusion that the national transmission system is in “critical need [of] new  
13 transmission infrastructure,” FERC adopted reforms to its *pro forma* OATT to “ensure that  
14 transmission infrastructure is constructed . . . on a nondiscriminatory basis and is

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16 *Utilities and Transmitting Utilities*, Docket Nos. RM95-8-000 and RM94-7-00161, Order No. 888 at  
17 6, FR 21,540, 1996 WL 239663 (F.E.R.C 1996) (FERC’s rules are intended to “remedy undue  
18 discrimination in access to the monopoly owned transmission wires that control whether and to  
19 whom electricity can be transported in interstate commerce”) (hereinafter “Order No. 888”);  
20 *Preventing Undue Discrimination and Preference in Transmission Service*, Docket Nos. RM05-17-  
21 000 and RM05-25-000; Order No. 890 at 40 (F.E.R.C. 2007) (transmission system must be  
22 “sufficient to support reliable and economic service to all eligible customers”) (hereinafter “Order  
23 No. 890”).

24 <sup>32</sup> Order No. 888 at 6-7.

25 <sup>33</sup> Order No. 888 at 7.

26 <sup>34</sup> Order No. 888 at 6. Although Idaho Power must accommodate requests for wheeling services  
pursuant to its OATT, it may reserve certain transmission capacity for its own use. Specifically,  
capacity necessary for native load growth and network transmission load growth that is reasonably  
forecasted may be reserved. Order No. 88 at 92. This reserved capacity, however, “must be  
posted on the OASIS and made available to others through the capacity reassignment  
requirements” if it is not currently needed and until it is actually needed and used. *Id.*

<sup>35</sup> Order No. 890 at 37.

1 otherwise sufficient to support reliable and economic service to all eligible customers.”<sup>36</sup>  
2 Thus, Idaho Power’s OATT, which incorporates the transmission infrastructure standards  
3 in FERC’s *pro forma* OATT, requires it to provide reliable and economic service to its  
4 transmission customers and construct transmission infrastructure to ensure these  
5 standards are met.<sup>37</sup>

6 Moreover, FERC’s *pro forma* OATT also includes a provision requiring transmission  
7 providers to “expand or upgrade [their] system” to accommodate requests for point-to-  
8 point service if redispatch of the system is not economical to relieve system constraints  
9 and allow efficient and reliable transmission.<sup>38</sup> Under Section 15.4 of the *pro forma* OATT:

10 “when a transmission provider cannot accommodate a request for  
11 point-to-point transmission because of insufficient capability on its  
12 system, it will ‘use due diligence to expand or modify its Transmission  
System to provide the requested Firm Transmission Service.’”<sup>39</sup>

13 The B2H transmission line is integral to Idaho Power’s OATT compliance.  
14 Construction of B2H will relieve the transmission system of its current congestion  
15 problems and reduce the risk of transmission outages that cause reliability concerns for  
16 the Company’s transmission customers. Moreover, construction of the transmission line  
17 will ensure that Idaho Power is able to meet the increasing requests for transmission as  
18 required by FERC.

19 Idaho Power has received requests to commence transmission service representing  
20 more than 4,000 MW between 2005 and 2014 on the Idaho Northwest transmission path.

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22 <sup>36</sup>Order No. 890 at 40. These reforms involve primarily greater transparency and coordination in  
the transmission infrastructure planning process.

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24 <sup>37</sup> See Idaho Power Company FERC Electric Tariff, First Revised Volume No. 6, Attachment K;  
Order No. 890 at App. C (*pro forma* OATT).

25 <sup>38</sup> Order No. 890 at 235-236.

26 <sup>39</sup> *Id.*

1 Of the 4,000 MW of service requests, only 133 MW were granted up through 2007 due to  
2 the limited available transmission capacity of the existing system. There are currently  
3 active transmission service requests being studied that are expected to commence  
4 operations when the proposed Boardman to Hemingway project is completed.

5 It should be noted that utility customers—not shareholders—benefit from wheeling  
6 revenues. Many of the commenters have suggested otherwise, arguing that the  
7 Company’s primary motive for building B2H is to generate wheeling revenues that will  
8 create profits for the Company.<sup>40</sup> This claim is inconsistent with the basic cost assignment  
9 principles applied by Idaho Power in its standard electric utility rate making process.  
10 Under the standard electric utility rate making process applied by Idaho Power, the  
11 Company develops rates to recover a “return on” and a “return of” its investment in  
12 facilities required to service customers (rate base) as well as the recovery of the  
13 associated operations and maintenance expense. However, as part of this process,  
14 customer rates are offset by any “other” revenue generated by those facilities, including  
15 transmission wheeling revenue. That is, wheeling revenue actually reduces the amount of  
16 revenue required from retail customers, rather than resulting in additional earnings for  
17 shareowners. The only potential profit component associated with the B2H transmission  
18 line will be associated with the allowed rate of return on the undepreciated plant  
19 investment over its useful life. This is the same for all types of facilities, transmission or  
20 otherwise.

21 **E. Regional Planning is Legitimately Considered as Part of Need.**

22 Several of the commenters have argued that B2H is not needed because it is being  
23 built to serve third party and out-of-state interests, and because it will not benefit  
24 Oregonians.<sup>41</sup> Neither argument has merit.

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25 <sup>40</sup> Tr. 12:23 – 13:1 (Findley).

26 <sup>41</sup> Tr. 53:2 – 8 (Pearson).

1 First of all, given the interconnected nature of the national electricity grid, the need  
2 for any particular transmission line cannot be considered in a vacuum. This principle was  
3 established by the Commission in its 1976 order granting a certificate of public  
4 convenience and necessity ("CPCN") to Pacific Power & Light ("PP&L") to construct a 500  
5 kV transmission line from southern Idaho to Medford, Oregon.<sup>42</sup> In that case PP&L argued  
6 that the proposed transmission line was needed to transmit energy from its Wyoming  
7 generating plant to customers in the western portion of its system. In addition to serving  
8 PP&L's own customers, the Commission noted that the proposed transmission line would  
9 also increase capacity, stability, and reliability for the Pacific Northwest Transmission Grid  
10 and Northwest Power Pool.<sup>43</sup> PP&L presented the Commission with alternatives to the  
11 proposed line and the Commission found that the alternatives "would not yield the same  
12 advantages to the regional and inter-regional transmission grids and inter-connected  
13 power systems as the proposed transmission line."<sup>44</sup> The Commission issued the CPCN  
14 because it concluded the proposed transmission line was necessary for PP&L to provide  
15 adequate service at reasonable rates, justified in the public interest, and the public  
16 convenience and necessity required it to be constructed along the route approved by the  
17 Commission.<sup>45</sup> Thus, the Commission's analysis focused not only on Oregon customers  
18 but also on the necessity to the regional transmission grid.

19 Here, Idaho Power's Oregon customers benefit from the Commission's regional  
20 planning because it allows Idaho Power to better import power from the Pacific Northwest

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21 <sup>42</sup> *Application of Pacific Power & Light Co. for Certificate of Public Convenience and Necessity*,  
22 Docket UF 3182, Order No. 76-359 (May 28, 1976) (343 of the 478 miles of proposed transmission  
line were in Oregon) (hereinafter "Order No. 76-359").

23 <sup>43</sup> Order No. 76-359 at 4.

24 <sup>44</sup> Order No. 76-359 at 5.

25 <sup>45</sup> Order No. 76-359 at 6. Although the Commission approved the project in this order, the full route  
26 was not approved until February 22, 1979. See Order 79-112.

1 power market—a market that is very liquid with a high number of participants and  
2 transactions. This ensures that rates remain just and reasonable and ensures that Idaho  
3 Power can continue to provide safe, reliable, and efficient service to its Oregon customers.

4 Moreover, contrary to many of the public and intervenor comments, B2H will in fact  
5 provide direct benefits to Oregon customers by serving increasing loads in Idaho Power's  
6 Eastern Oregon service territory. Just this last February Mission West Properties, Inc. and  
7 CDH Consulting announced that they would be building a new data center located in  
8 Ontario, Oregon. The planned data center will be sized up to 300,000 square feet and will  
9 include a 62 MVA onsite power station. This is precisely the type of new load that the  
10 Company must plan for.

11 **F. Response to Renewable Northwest Project Comments**

12 RNP is the only intervenor to file formal comments with the Commission on the  
13 Company's 2009 IRP. Idaho Power would like to thank RNP for its interest and  
14 participation in the development of the 2009 IRP. While not officially represented on the  
15 IRPAC, RNP representatives attended many of the IRPAC meetings and provided input  
16 throughout the process of preparing the plan.

17 Idaho Power appreciates RNP's positive comments related to the analyses of future  
18 carbon regulation scenarios in the IRP. On that subject RNP states: "Idaho Power's IRP  
19 strategically accounts for the cost, risk and environmental concerns associated with future  
20 limits on greenhouse gas emissions."<sup>46</sup> One of Idaho Power's primary goals in preparing  
21 the IRP is to balance cost, risk, and environmental concerns, for all aspects of resource  
22 planning.

23 RNP's positive comments are tempered by concern over the future operation of the  
24 Boardman coal-fired plant. Idaho Power is a 10 percent owner of the project which

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26 <sup>46</sup> *Re Idaho Power Company 2009 Integrated Resource Plan*, Docket LC 50, Comments of  
Renewable Northwest Project at 1 (Apr. 20, 2010).

1 provides approximately 55 aMW of generation for Idaho Power's customers. Portland  
2 General Electric, the majority owner and operator of the project, evaluated several  
3 scenarios in its 2009 IRP regarding possible closure dates and at present, there is still  
4 much uncertainty regarding the future operation of the plant.

5 In the coal curtailment scenario (Waxman-Markey) analyzed in Idaho Power's 2009  
6 IRP, more than 100 MW of Idaho Power's coal generation is curtailed prior to 2014—which  
7 is the earliest date under consideration for the closure of the Boardman plant. In addition,  
8 if the Boardman plant is closed the transmission capacity used to bring energy from  
9 Boardman to Idaho Power's customers would be available to import energy from the  
10 Pacific Northwest power market. For these reasons, Idaho Power believes there is low  
11 risk associated with the treatment of the Boardman plant in the 2009 IRP. Idaho Power  
12 anticipates more definitive information will be available regarding the future of the  
13 Boardman plant which can be incorporated in the Company's 2011 IRP.

14 RNP also provided comments on the disposition of renewable energy certificates  
15 ("REC") that Idaho Power is currently acquiring. Idaho Power is in a unique situation  
16 because it has customers in Oregon where there is a renewable portfolio standard  
17 ("RPS"), and in Idaho which does not have an RPS.

18 Under the Oregon RPS, Idaho Power is categorized as a "smaller utility" which  
19 results in a 10 percent requirement beginning in 2025. In the 2009 IRP, Idaho Power  
20 assumes a federal renewable electricity standard ("RES") will be passed in the near future.  
21 The preferred portfolio and all portfolios analyzed in the IRP were designed to meet a  
22 federal RES, which is expected to substantially exceed Idaho Power's RPS requirements  
23 in Oregon.

24 Currently, a docket is open at the IPUC to address the disposition of Idaho Power's  
25 RECs. In December 2009, Idaho Power submitted a plan to the IPUC which outlines  
26 Idaho Power's strategy regarding RECs. The general strategy presented in the plan is to

1 continue to acquire long term rights to RECs in anticipation of a federal RES, but to sell  
2 them in the short term until a requirement exists. This strategy benefits Idaho Power's  
3 customers as revenues from REC sales are used to reduce customer rates in the short  
4 term, and risk is lowered by acquiring long term rights to RECs in order to comply with a  
5 federal RES.

6 **III. CONCLUSION**

7 Idaho Power thanks all commenters for their interest and participation in this IRP  
8 docket. With respect to the criticisms of the 2009 IRP's inclusion of the B2H project in the  
9 preferred portfolio, Idaho Power submits that the criticisms are without merit and the  
10 Commission should acknowledge the IRP as filed.

11

12 Respectfully submitted this 19<sup>th</sup> day of May, 2010.

13

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**McDOWELL RACKNER & GIBSON PC**

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**IDAHO POWER COMPANY**

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

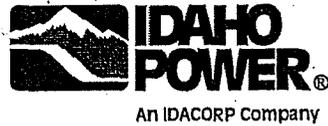
**IDAHO POWER COMPANY**

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**Idaho Power Company's Response to  
Intervenor and Public Comments in its  
2009 Integrated Resource Plan**

**Exhibit No. 1**

**May 19, 2010**



March 22, 2010

Subject: Docket No. LC 50  
Idaho Power Company's Response to Staff's Data Request 16

**STAFF'S DATA REQUEST NO. 16:**

Please conduct a construction cost risk analysis for the Boardman to Hemingway transmission line. This analysis should include a "tipping point" calculation with regard to portfolio 1-2. At a minimum, this risk analysis should include the following scenarios: worst case construction costs in portfolio 1-4 vs. low natural gas prices in portfolio 1-2, best case construction costs in 1-4 vs. high natural gas prices in 1-2, and best case construction costs in 1-4 vs. low natural gas prices in 1-2. Please provide your analysis in an Excel workbook with all formula's intact and references cited.

**IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 16:**

The construction costs used in the tipping point chart represent a high estimate and not necessarily an unbounded "worst case." The construction costs are included on the attached Excel file entitled *B2H 500 kV Project Estimates High*.

The attached Excel spreadsheet, *Tipping Point Chart*, shows the risk analysis with the following scenarios: worst case construction costs in portfolio 1-4 vs. low natural gas prices in portfolio 1-2, best case construction costs in portfolio 1-4 vs. high natural gas prices in portfolio 1-2, and best case construction costs in portfolio 1-4 vs. low natural gas prices in portfolio 1-2.

To be consistent with the presentation of the tipping point chart presented in the Company's Response to Staff's Data Request No. 14, the second ten years (2020-2029) need to be included in the chart. Additionally, no low cost natural gas price AURORA runs were used in completing the 2009 Integrated Resource Plan. These changes require the preferred portfolio 2-4 to be run in AURORA with portfolio 1-2 as the starting point and removing the transmission expansion assumed in portfolio 1-4.

The following Excel files supporting the tipping point chart calculations are included with this response: *IRP Transmission Rate Est with B2H\_High\_Estimate* and *IRP Transmission Rate Est with B2H\_Transmission Range of Costs High*.

## Attachment 1 - Response Staff DR 16

B2H IRP Estimate-High

Boardman - Hemingway 500 kV Line Estimate - High				
<b>Conceptual Level Project Cost Estimate</b>		Lines Contingency %:	30%	
		AFUDC %:	5%	
		Gen w/o overhead %:	10%	
March 2010		IPCo Share %:	100%	
Location & Description	Transmission Line Costs, \$	Total Cost, \$	Total Cost/Mile, \$	Commitment Date
<u>Transmission Lines:</u>				
Boardman - Hemingway 500 kV Line				
	Line length (miles):	300		
	Permitting & Engineering Price	\$ 30,000,000	\$ 43,500,000	Apr-10
	ROW Price/mile	\$ 150,000	\$ 65,250,000	\$ 217,500 Jan-12
	Mitigation Price/mile	\$ 150,000	\$ 65,250,000	\$ 217,500 Jun-13
	Lattice Structure Material Price/mile:	\$ 500,000	\$ 217,500,000	\$ 725,000 Jun-12
	Lattice Structure Labor Price/mile:	\$ 800,000	\$ 348,000,000	\$ 1,160,000 Jun-13
	<b>Subtotal ==&gt;</b>	<b>\$ 510,000,000</b>		
	Contingency:	\$ 153,000,000		
	AFUDC:	\$ 25,500,000		
	IPC Capital work order overhead:	\$ 51,000,000		
	Substations	\$ 56,702,685		
	<b>TOTAL ESTIMATED PROJECT COST ==&gt;</b>	<b>\$ 796,202,685</b>		
	<b>TOTAL PROJECT COST/MILE ==&gt;</b>	<b>\$ 2,654,009</b>		
<u>Notes:</u>				
1. All estimates are conceptual level estimates.				
2. Commitment dates are preliminary and based on June 2015 in-service date.				

Attachment 2 - Response Staff DR 16

Transmission Rate Approximation

Annual Revenue Requirements

Existing	\$ 106,566,650
New Project Capital	\$ 2,421,122,422,422
Ratio of New Revenue Requirements/(New Capital)	0.160
New Revenue Requirements = (New Capital) * Ratio	\$ 36,041,758
Existing Revenue Credits	(\$ 17,518,153)
Existing Revenue Requirements	\$ 89,056,454
New Revenue Requirements	\$ 185,094,225
<b>Total</b>	<b>\$ 274,150,679</b>

System Mix

Existing System Peak Demand - MW	5,627
Additional System Demand - Project Fully subscribed	1,000
New System Demand - Project Fully subscribed	8,627

Portfolio 1-1 (Large 200 MW at Langley)

Year	Backbone Only	100% NPC	NPY	NPY outband
2010	0	0	0	0
2011	0	0	0	0
2012	0	0	0	0
2013	0	0	0	0
2014	0	0	0	0
2015	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2016	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2017	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2018	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2019	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2020	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2021	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2022	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2023	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2024	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2025	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2026	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2027	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2028	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
2029	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303	\$ 4,496,303
<b>Total</b>	<b>\$ 29,262,425.74</b>	<b>\$ 29,262,425.74</b>	<b>\$ 29,262,425.74</b>	<b>\$ 29,262,425.74</b>

Portfolio 1-2 (330 MW at Langley)

Year	Backbone Only	100% NPC	NPY	NPY outband
2010	0	0	0	0
2011	0	0	0	0
2012	0	0	0	0
2013	0	0	0	0
2014	0	0	0	0
2015	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2016	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2017	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2018	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2019	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2020	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2021	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2022	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2023	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2024	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2025	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2026	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2027	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2028	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
2029	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520	\$ 3,748,520
<b>Total</b>	<b>\$ 24,402,281.28</b>	<b>\$ 24,402,281.28</b>	<b>\$ 24,402,281.28</b>	<b>\$ 24,402,281.28</b>

Portfolio 1-3 (150 MW)

Existing	\$ 83,056,456	0
With New Project - no revenues	\$ 166,214,596	\$ 77,158,130
With New Project - Fully subscribed	\$ 101,844,412	\$ 12,747,915

Year	Fully Subscribed	Outband not sold	100% NPC	NPY	NPY outband
2010	0	0	0	0	0
2011	0	0	0	0	0
2012	0	0	0	0	0
2013	0	0	0	0	0
2014	0	0	0	0	0
2015	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2016	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2017	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2018	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2019	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2020	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2021	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2022	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2023	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2024	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2025	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2026	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2027	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2028	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
2029	\$ 13,210,615	\$ 18,923,915	\$ 85,354,729	\$ 13,210,615	\$ 18,923,915
<b>Total</b>	<b>\$ 83,056,456</b>	<b>\$ 123,158,883.52</b>	<b>\$ 83,056,456</b>	<b>\$ 83,056,456</b>	<b>\$ 123,158,883.52</b>

High Voltage

Year	Fully Subscribed	Outband not sold	100% NPC	NPY	NPY outband
2010	0	0	0	0	0
2011	0	0	0	0	0
2012	0	0	0	0	0
2013	0	0	0	0	0
2014	0	0	0	0	0
2015	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2016	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2017	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2018	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2019	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2020	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2021	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2022	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2023	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2024	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2025	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2026	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2027	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2028	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
2029	\$ 20,179,942	\$ 40,359,884	\$ 20,179,942	\$ 20,179,942	\$ 40,359,884
<b>Total</b>	<b>\$ 181,819,558</b>	<b>\$ 363,639,117</b>	<b>\$ 181,819,558</b>	<b>\$ 181,819,558</b>	<b>\$ 363,639,117</b>

Expected Returns

Year	Fully Subscribed	Outband not sold	NPY	NPY outband
2010	0	0	0	0
2011	0	0	0	0
2012	0	0	0	0
2013	0	0	0	0
2014	0	0	0	0
2015	18520081	32261593	0	0
2016	18520081	32261593	0	0
2017	18520081	32261593	0	0
2018	18520081	32261593	0	0
2019	18520081	32261593	0	0
2020	18520081	32261593	48315399.79	94451794.49
2021	18520081	32261593	48315399.79	94451794.49
2022	18520081	32261593	48315399.79	94451794.49
2023	18520081	32261593	48315399.79	94451794.49
2024	18520081	32261593	48315399.79	94451794.49
2025	18520081	32261593	48315399.79	94451794.49
2026	18520081	32261593	48315399.79	94451794.49
2027	18520081	32261593	48315399.79	94451794.49
2028	18520081	32261593	48315399.79	94451794.49
2029	18520081	32261593	48315399.79	94451794.49
<b>Total</b>	<b>107514472.1</b>	<b>209961933.1</b>	<b>107514472.1</b>	<b>209961933.1</b>

## Attachment 2 - Response Staff DR 16

IDAHO POWER COMPANY  
RATE CALCULATION  
12 Months Ended 12/31/2008

		B2H			
		600,000,000			
	Source	Amount			
<b>TRANSMISSION RATE BASE</b>					
1	Transmission Plant (excluding Asset Retirement Costs)	742,870,924			
2	Generator Step Up Facilities	(16,703,791)			
3	LGI's	(821,682)			
4	Account 252-Transmission (Net)	(2,310,431)			
5	General Plant (excluding Asset Retirement Costs)	30,744,244			
6	Intangible Plant	6,961,612			
7	Transmission Plant Held For Future Use	676,535			
8	General Plant Held For Future Use	112,758			
9	Transmission Depreciation Reserve (Acct 108) (excluding Asset Retirement Costs)	(230,292,212)			
10	Transmission Depreciation Reserve Generator Step-Ups	9,787,710			
11	Transmission Depreciation Reserve LGI's	93,681			
12	General Plant Depreciation Reserve (excluding Asset Retirement Costs)	(11,660,762)			
13	Amortization of Utility Plant	2,379,351			
14	ADIT Allocated to Trans	(49,151,423)			
15	ADIT Allocated to Gen & Intang.	(2,555,053)			
16	Transmission Related Prepayments	1,252,469			
17	Transmission Materials & Supplies	10,342,021			
18	Transmission Cash Working Capital	4,644,612			
19	Unamortized RTO Development Costs	\$2,384,070			
20	Transmission Rate Base	498,754,634	1,098,754,634		
21					
<b>RETURN AND ASSOCIATED INCOME TAXES</b>					
23	Overall Return	0.08203			
24	Composite Income Tax (Federal and State)	0.03427			
25	Return and Income Taxes	58,005,164	127,785,164		
26					
<b>Expense Allocation Ratio for new Transmission Plant</b>					
			100%	50%	0%
28	<b>EXPENSES</b>				
29	Deprec Expense: Transmission	14,609,825	14,609,825		
30	Deprec Expense: General Plant	1,654,697		1,654,697	
31	Depreciation Expense: intangible Plant	696,024		696,024	
32	Amort of ITC (Acct 411.4)	430,116		430,116	
33	O&M Expense: Transmission	23,196,223		23,196,223	
34	Less Account 561 (Load Dispatching)	(2,883,995)		(2,883,995)	
35	Less: Account 565 (Transmission of Electricity By Others)	(7,250,299)		(7,250,299)	
36	O&M Expense: A&G	13,960,670		13,960,670	
37	Taxes Other than Income:	3,003,630	3,003,630		
38	Amortization of RTO Development Costs	\$922,866			\$922,866
39	Interest Expense (Network Upgrade Prepayments)	\$221,728			\$221,728
40	Transmission Expense	48,561,486	74,823,254	17,613,456	29,803,436
41	Gross Transmission Revenue Requirement	(25) + (40)	106,566,650	202,608,418	31,839,445
	Net Rev Req of New Project		96,041,768		41,839,216
		0.14	0.16	recovery from all Network Transmission Customers ratio of net revenue requirement to new capital investment	
43	Transmission Revenue Credits	Schedule 4	(17,510,193)	(17,510,193)	
44					
45	Net PTP Transmission Revenue Requirement	(41) - (43)	89,056,456	185,098,225	
46					
47	System Peak Demand - MW	Schedule 5	5,627	5,627	assumes no additional service
48					
49	Annual Rate \$/kW per year	(45)/((47)*1000)	15.83	32.90	new transmission rate with no additional service
	New Service		3,000	8,627	assume new transmission service - fully subscribed project new system peak demand
	Annual Rate \$/kW per year		21.46		new transmission rate with project fully subscribed
	Revenue from new service		64,370,174		
	Net Net Rev Req of New Project - if fully subscribed		31,671,594		recovery from all Network Transmission Customers

## Attachment 2 - Response Staff DR 16

IDAHO POWER COMPANY  
RATE CALCULATION  
12 Months Ended 12/31/2008

### TRANSMISSION RATE BASE

1 Transmission Plant (excluding Asset Retirement Costs)  
2 Generator Step Up Facilities  
3 LGI's  
4 Account 252-Transmission (Net)  
5 General Plant (excluding Asset Retirement Costs)  
6 Intangible Plant  
7 Transmission Plant Held For Future Use  
8 General Plant Held For Future Use  
9 Transmission Depreciation Reserve (Acct 108) (excluding Asset Retirement Costs)  
10 Transmission Depreciation Reserve Generator Step-Ups  
11 Transmission Depreciation Reserve LGI's  
12 General Plant Depreciation Reserve (excluding Asset Retirement Costs)  
13 Amortization of Utility Plant  
14 ADIT Allocated to Trans  
15 ADIT Allocated to Gen & Intang  
16 Transmission Related Prepayments  
17 Transmission Materials & Supplies  
18 Transmission Cash Working Capital  
19 Unamortized RTO Development Costs  
20 Transmission Rate Base

### RETURN AND ASSOCIATED INCOME TAXES

21  
22  
23 Overall Return  
24 Composite Income Tax (Federal and State)  
25 Return and Income Taxes  
26  
27

### EXPENSES

28  
29 Deprec Expense: Transmission  
30 Deprec Expense: General Plant  
31 Depreciation Expense: Intangible Plant  
32 Amort of ITC (Acct 411.4)  
33 O&M Expense: Transmission  
34 Less Account 561 (Load Dispatching)  
35 Less: Account 565 (Transmission of Electricity By Others)  
36 O&M Expense: A&G  
37 Taxes Other than Income:  
38 Amortization of RTO Development Costs  
39 Interest Expense (Network Upgrade Prepayments)  
40 Transmission Expense  
41 Gross Transmission Revenue Requirement  
42  
43 Transmission Revenue Credits  
44  
45 Net PTP Transmission Revenue Requirement  
46

### System Peak Demand - MW

47  
48

## Attachment 2 - Response Staff DR 16

- 49 Annual Rate \$/kW per year
- 50 Monthly Rate \$/kW per month
- 51 Weekly Rate \$/kW per week
- 52 Daily Rate \$/kW per day (Mon-Sat)
- 53 Daily Rate \$/kW per day (Sunday)
- 54 Hourly Rate \$/MW per hour (Peak)
- 55 Hourly Rate \$/MW per hour (Off-Peak)

## Attachment 2 - Response Staff DR 16

Source	Amount
FF1 p207 58(g) - 57(g)	742,870,924
Schedule 7	(16,703,791)
Schedule 8	(821,682)
Schedule 9	(2,310,431)
Schedule 1	30,744,244
Schedule 1	6,961,612
FF1 p214 4d + 5d + 12d	676,535
Schedule 1	112,758
FF1 p 219 25(b) - 108.100 = 0	(230,292,212)
Schedule 7	9,787,710
Schedule 8	93,681
Schedule 1	(11,660,762)
Schedule 1	2,379,351
Schedule 1	(49,151,423)
Schedule 1	(2,555,053)
Schedule 1	1,252,469
Schedule 1	10,342,021
Schedule 1	4,644,612
OATT Attach H, 3.1.1.11(c)	\$2,384,070
Sum (1) Thru (19)	498,754,634
Schedule 6	0.08203
Schedule 6	0.03427
(20)*((23)+(24))	58,005,164
Schedule 2	14,609,825
Schedule 2	1,654,697
Schedule 2	696,024
Schedule 2	430,116
Schedule 2	23,196,223
FF1 p 321 84b to 92b	(2,883,995)
FF1 p 321 96b	(7,250,299)
Schedule 2	13,960,670
Schedule 2	3,003,630
OATT Attach H, 3.7	\$922,866
Schedule 9	<u>\$221,728</u>
Sum (29) Thru (39)	48,561,486
(25) + (40))	106,566,650
Schedule 4	(17,510,193)
(41) - (43)	89,056,456
Schedule 5	5,627

## Attachment 2 - Response Staff DR 16

(45)/((47)*1000)	15.83
(49) / 12	1.3192
(49) / 52	0.3044
(51) / 6	0.0507
(51) / 7	0.0435
(49)*1000 / 4896	3.23
(49)*1000 / 8760	1.81

### Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan  
Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-1

Project	Capital Cost
Large Aero 200 MW at Langley G	\$ 22,000,000
200 MW Solar	\$ 4,500,000

---

**Annual Revenue Requirements**

---

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 26,500,000</b>
New Revenue Requirements for Project(s).....	\$ 4,241,845
New Net Revenue Requirements.....	\$ 93,298,301

---

**System Use (in MW)**

---

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>400</b>
New System Demand—Including new uses.....	6,027

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**Point-To-Point Transmission Rate**

---

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 15.48

---

**Point-To-Point Revenue Adjustments (incremental change to Existing Revenue Credits)**

---

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ 383,526

---

**Network Transmission Revenue Requirements**

---

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future</b>	
BPA Load Ratio Share.....	\$ 4,144,207
Long-Term PTP Revenue.....	\$ 7,214,205
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 75,197,067
<b>Net change</b>	<b>\$ 4,496,303</b>

## Attachment 3 - Response Staff DR 16

### 2009 Integrated Resource Plan Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-2

Project	Capital Cost
Two 170 MW Peakers at Langley	\$ 22,000,000

---

#### Annual Revenue Requirements

---

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 22,000,000</b>
New Revenue Requirements for Project(s).....	\$ 3,521,532
New Net Revenue Requirements.....	\$ 92,577,988

---

#### System Use (in MW)

---

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>340</b>
New System Demand—including new uses.....	5,967

---

#### Point-To-Point Transmission Rate

---

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 15.52

---

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

---

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ 344,857

---

#### Network Transmission Revenue Requirements

---

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future</b>	
BPA Load Ratio Share.....	\$ 4,154,388
Long-Term PTP Revenue.....	\$ 7,230,494
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 74,450,284
<b>Net change</b>	<b>\$ 3,749,520</b>

### Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan  
Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-3 with additional 3rd party subscription		
Project	Capital Cost	
B2H 11% Owned by IPCo (250/2300)	\$	65,217,391
Two 100MW Aeros at Langley	\$	22,000,000

---

#### Annual Revenue Requirements

---

Existing Revenue Requirements.....	\$	106,566,650
Existing Revenue Credits.....	\$	(17,510,193)
Existing Net Revenue Requirements.....	\$	89,056,456
<b>New Project Capital</b>	<b>\$</b>	<b>87,217,391</b>
New Revenue Requirements for Project(s).....	\$	13,960,854
New Net Revenue Requirements.....	\$	103,017,310

---

#### System Use (in MW)

---

Existing System Peak Demand.....	5,627
Future additional IPC Network Use	450
New System Demand—Including new uses.....	6,077

---

#### Point-To-Point Transmission Rate

---

a) Existing Rate—\$/kW-yr.....	\$	15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$	16.95

---

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

---

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (1,244,978)

---

#### Network Transmission Revenue Requirements

---

<b>a) Existing</b>		
BPA Load Ratio Share.....	\$	4,237,114
Long-Term PTP Revenue.....	\$	7,375,757
Legacy Contract Revenue.....	\$	6,742,822
Assigned to IPC Retail Load Service.....	\$	70,700,764
<b>b) Future - B2H with additional participation</b>		
BPA Load Ratio Share.....	\$	4,462,935
Long-Term PTP Revenue.....	\$	7,900,174
Legacy Contract Revenue.....	\$	6,742,822
Assigned to IPC Retail Load Service.....	\$	83,911,380
<b>Net change</b>	<b>\$</b>	<b>13,210,615</b>

## Attachment 3 - Response Staff DR 16

### 2009 Integrated Resource Plan Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-3 without additional 3rd party subscription

Project	Capital Cost
B2H 22% Owned by IPCo (500/2300)	\$ 130,434,783
Two 100MW Aeros at Langley	\$ 22,000,000

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 152,434,783</b>
New Revenue Requirements for Project(s).....	\$ 24,400,177
New Net Revenue Requirements.....	\$ 113,456,633

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>450</b>
New System Demand—including new uses.....	6,077

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 18.67

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (3,145,545)

#### Network Transmission Revenue Requirements

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - B2H without additional participation</b>	
BPA Load Ratio Share.....	\$ 4,837,378
Long-Term PTP Revenue.....	\$ 8,700,743
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 93,175,690
<b>Net change</b>	<b>\$ 22,474,926</b>

### Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan

**Idaho Power Transmission Rate Approximation for 2009 IRP Analysis**

Portfolio 1-4 with additional 3rd party subscription

Project	Capital Cost
B2H 19% owned by IPCo (425/2300)	\$ 110,869,565
123.25% B2H 19% owned by IPCo (425/2300)	\$ 136,646,739
450 Market Purchase	included in B2H

---

**Annual Revenue Requirements**

---

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 136,646,739</b>
New Revenue Requirements for Project(s).....	\$ 21,872,991
New Net Revenue Requirements.....	\$ 110,929,447

---

**System Use (in MW)**

---

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>425</b>
New System Demand—including new uses.....	6,052

---

**Point-To-Point Transmission Rate**

---

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 18.33

---

**Point-To-Point Revenue Adjustments (incremental change to Existing Revenue Credits)**

---

Change in existing uses (Increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (2,768,881)

---

**Network Transmission Revenue Requirements**

---

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - B2H with additional participation</b>	
BPA Load Ratio Share.....	\$ 4,763,797
Long-Term PTP Revenue.....	\$ 8,542,082
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 90,880,746
<b>Net change</b>	<b>\$ 20,179,982 High Va</b>

## Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan

### Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-4 without additional 3rd party subscription

Project	Capital Cost
B2H 37% owned by IPCo (850/2300)	\$ 221,739,130
450 Market Purchase	included in B2H

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 221,739,130</b>
New Revenue Requirements for Project(s).....	\$ 35,493,697
New Net Revenue Requirements.....	\$ 124,550,153

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>425</b>
New System Demand—including new uses.....	6,052

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 20.58

#### Point-To-Point Revenue Adjustments (incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (5,258,889)

#### Network Transmission Revenue Requirements

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - B2H without additional participation</b>	
BPA Load Ratio Share.....	\$ 5,254,035
Long-Term PTP Revenue.....	\$ 9,590,940
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 102,962,357
<b>Net change</b>	<b>\$ 32,261,593</b>

### Attachment 3 - Response Staff DR 16

#### 2009 Integrated Resource Plan Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 2-1

Project	Capital Cost
Gateway 44% owned by IPCo (1020/2300)	\$ 1,316,021,739
250 East Side Purchase	included in GW
670 MW Nuclear	included in GW
300 MW Solar	\$ 7,500,000
104 MW Geothermal	\$ 30,000,000

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 1,353,521,739</b>
New Revenue Requirements for Project(s).....	\$ 216,657,702
New Net Revenue Requirements.....	\$ 305,714,159

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>1,424</b>
New System Demand—including new uses.....	7,051

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 43.36

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (30,458,820)

#### Network Transmission Revenue Requirements

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - New Projects without additional participation</b>	
BPA Load Ratio Share.....	\$ 10,321,179
Long-Term PTP Revenue.....	\$ 20,205,817
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 268,444,341
<b>Net change</b>	<b>\$ 197,743,576</b>

## Attachment 3 - Response Staff DR 16

### 2009 Integrated Resource Plan Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 2-2

Project	Capital Cost
Gateway 60% owned by IPCo (900/1500)	\$ 1,780,500,000
MSTI 47% owned by IPCo (700/1500)	\$ 466,666,667
700 MW East Side Purchase (Wyoming)	included in GW
200 MW Wind	Included in GW

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#### Annual Revenue Requirements

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Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 2,247,166,667</b>
New Revenue Requirements for Project(s).....	\$ 359,703,101
New Net Revenue Requirements.....	\$ 448,759,557

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#### System Use (in MW)

---

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>1,600</b>
New System Demand—Including new uses.....	7,227

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#### Point-To-Point Transmission Rate

---

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 62.10

---

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

---

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (51,188,896)

---

#### Network Transmission Revenue Requirements

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<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - New Projects without additional participation</b>	
BPA Load Ratio Share.....	\$ 14,527,165
Long-Term PTP Revenue.....	\$ 28,937,873
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 398,551,697
<b>Net change</b>	<b>\$ 327,850,933</b>

## Attachment 3 - Response Staff DR 16

### 2009 Integrated Resource Plan Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 2-3

Project	Capital Cost
Gateway 40% owned by IPCo (600/1500) (Aeolus-Hemingway)	\$ 1,187,000,000
300 MW Solar	\$ 7,500,000
400 Large Aero (simco Road)	\$ 32,000,000

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 1,226,500,000</b>
New Revenue Requirements for Project(s).....	\$ 196,325,382
New Net Revenue Requirements.....	\$ 285,381,838

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>1,300</b>
New System Demand—including new uses.....	6,927

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 41.20

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (28,070,146)

#### Network Transmission Revenue Requirements

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
<b>b) Future - New Projects without additional participation</b>	
BPA Load Ratio Share.....	\$ 9,829,717
Long-Term PTP Revenue.....	\$ 19,199,644
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 249,609,655
<b>Net change</b>	<b>\$ 178,908,891</b>

### Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan  
Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 2-4

Project	Capital Cost
Gateway 31% owned by IPCo (600/1600)	\$ 675,000,000
500 Wind	Included in GW
100 MW East Side Purchase	included in GW
300 MW Aeros at Langley	\$ 22,000,000
1100 MW Aeros At Simco	\$ 102,000,000

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 799,000,000</b>
 New Revenue Requirements for Project(s).....	 \$ 127,895,622
New Net Revenue Requirements.....	\$ 216,952,078

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>2,000</b>
 New System Demand—including new uses.....	 7,627

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 28.45

#### Point-To-Point Revenue Adjustments (incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (13,960,338)

#### Network Transmission Revenue Requirements

<b>a) Existing</b>	
BPA Load Ratio Share.....	\$ 4,237,114
Long-Term PTP Revenue.....	\$ 7,375,757
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 70,700,764
 <b>b) Future - New Projects without additional participation</b>	
BPA Load Ratio Share.....	\$ 7,010,667
Long-Term PTP Revenue.....	\$ 13,256,220
Legacy Contract Revenue.....	\$ 6,742,822
Assigned to IPC Retail Load Service.....	\$ 189,942,369
<b>Net change</b>	<b>\$ 119,241,605</b>

### Attachment 3 - Response Staff DR 16

2009 Integrated Resource Plan  
Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 2-5

Project	Capital Cost
Gateway 19% owned by IPCo (300/1600)	\$ 337,500,000
300 Wind	Included in GW
1050 Existing Coal	

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**Annual Revenue Requirements**

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Existing Revenue Requirements.....	\$	106,566,650
Existing Revenue Credits.....	\$	(17,510,193)
Existing Net Revenue Requirements.....	\$	89,056,456
<b>New Project Capital</b>	<b>\$</b>	<b>337,500,000</b>
<hr/>		
New Revenue Requirements for Project(s).....	\$	54,023,495
New Net Revenue Requirements.....	\$	143,079,951

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**System Use (in MW)**

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Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>300</b>
<hr/>	
New System Demand—Including new uses.....	5,927

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**Point-To-Point Transmission Rate**

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a) Existing Rate—\$/kW-yr.....	\$	15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$	24.14

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**Point-To-Point Revenue Adjustments (incremental change to Existing Revenue Credits)**

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Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (9,198,010)

---

**Network Transmission Revenue Requirements**

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<b>a) Existing</b>		
BPA Load Ratio Share.....	\$	4,237,114
Long-Term PTP Revenue.....	\$	7,375,757
Legacy Contract Revenue.....	\$	6,742,822
Assigned to IPC Retail Load Service.....	\$	70,700,764
<hr/>		
<b>b) Future - New Projects without additional participation</b>		
BPA Load Ratio Share.....	\$	6,028,365
Long-Term PTP Revenue.....	\$	11,250,202
Legacy Contract Revenue.....	\$	6,742,822
Assigned to IPC Retail Load Service.....	\$	119,058,562
<b>Net change</b>	<b>\$</b>	<b>48,357,798</b>

Attachment 3 - Response Staff DR 16

IDAHO POWER COMPANY  
RATE CALCULATION  
12 Months Ended 12/31/2008

		B2H	
		600,000,000	
	Source	Amount	
<b>TRANSMISSION RATE BASE</b>			
1	Transmission Plant (excluding Asset Retirement Costs)	742,870,924	
2	Generator Step Up Facilities	(16,703,791)	
3		(821,682)	
4	Account 252-Transmission (Net)	(2,310,431)	
5	General Plant (excluding Asset Retirement Costs)	30,744,244	
6	Intangible Plant	6,961,612	
7	Transmission Plant Held For Future Use	676,535	
8	General Plant Held For Future Use	112,758	
9	Transmission Depreciation Reserve (Acct 108) (excluding Asset Retirement Costs)	(230,292,212)	
10	Transmission Depreciation Reserve Generator Step-Ups	9,787,710	
11	Transmission Depreciation Reserve LGI's	93,681	
12	General Plant Depreciation Reserve (excluding Asset Retirement Costs)	(11,660,762)	
13	Amortization of Utility Plant	2,379,351	
14	ADIT Allocated to Trans	(49,151,423)	
15	ADIT Allocated to Gen & Intang	(2,555,053)	
16	Transmission Related Prepayments	1,252,469	
17	Transmission Materials & Supplies	10,342,021	
18	Transmission Cash Working Capital	4,644,612	
19	Unamortized RTO Development Costs	\$2,384,070	
20	Transmission Rate Base	(20) + B2H 498,754,634	1,098,754,634
21			
<b>RETURN AND ASSOCIATED INCOME TAXES</b>			
22	Overall Return	0.08203	
23	Composite Income Tax (Federal and State)	0.03427	
24	Return and Income Taxes	(20)*((23)+(24)) 58,005,164	127,785,164
25			
26			
27			
<b>EXPENSES</b>			
28	Deprec Expense: Transmission	14,609,825	14,609,825
29	Deprec Expense: General Plant	1,654,697	1,654,697
30	Depreciation Expense: Intangible Plant	696,024	696,024
31	Amort of ITC (Acct 411.4)	430,116	430,116
32	O&M Expense: Transmission	23,196,223	23,196,223
33	Less Account 561 (Load Dispatching)	(2,883,995)	(2,883,995)
34	Less: Account 565 (Transmission of Electricity By Others)	(7,250,299)	(7,250,299)
35	O&M Expense: A&G	13,960,670	13,980,670
36	Taxes Other than Income:	3,003,630	3,003,630
37	Amortization of RTO Development Costs	\$922,866	\$922,866
38	Interest Expense (Network Upgrade Prepayments)	\$221,728	\$221,728
39	Transmission Expense	Sum (29) Thru (39) 48,561,486	74,823,254
40	Gross Transmission Revenue Requirement	(25) + (40)) 106,566,650	202,608,418
41	Net Rev. Req. of New Project		96,041,768
		0.14	0.16
			recovery from all Network Transmission Customers ratio of net revenue requirement to new capital investment
43	Transmission Revenue Credits	Schedule 4 (17,510,193)	(17,510,193)
44			
45	Net PTP Transmission Revenue Requirement	(41) - (43) 89,056,456	185,098,225
46			
47	System Peak Demand - MW	Schedule 5 5,627	5,627
48			assumes no additional service
49	Annual Rate \$/KW per year	(45)/((47)*1000) 15.83	32.90
			new transmission rate with no additional service
	New Service		3,000
			8,627
	Annual Rate \$/KW per year		21.46
			assume new transmission service - fully subscribed project new system peak demand
			new transmission rate with project fully subscribed
	Revenue from new service		64,370,174
	Net Rev. Req. of New Project - fully subscribed		31,671,594
			recovery from all Network Transmission Customers

## Attachment 3 - Response Staff DR 16

IDAHO POWER COMPANY  
RATE CALCULATION  
12 Months Ended 12/31/2008

### TRANSMISSION RATE BASE

1 Transmission Plant (excluding Asset Retirement Costs)  
2 Generator Step Up Facilities  
3  
4 Account 252-Transmission (Net)  
5 General Plant (excluding Asset Retirement Costs)  
6 Intangible Plant  
7 Transmission Plant Held For Future Use  
8 General Plant Held For Future Use  
9 Transmission Depreciation Reserve (Acct 108) (excluding Asset Retirement Costs)  
10 Transmission Depreciation Reserve Generator Step-Ups  
11 Transmission Depreciation Reserve LGI's  
12 General Plant Depreciation Reserve (excluding Asset Retirement Costs)  
13 Amortization of Utility Plant  
14 ADIT Allocated to Trans  
15 ADIT Allocated to Gen & Intang  
16 Transmission Related Prepayments  
17 Transmission Materials & Supplies  
18 Transmission Cash Working Capital  
19 Unamortized RTO Development Costs  
20 Transmission Rate Base

### RETURN AND ASSOCIATED INCOME TAXES

21  
22  
23 Overall Return  
24 Composite Income Tax (Federal and State)  
25 Return and Income Taxes  
26

### EXPENSES

27  
28  
29 Deprec Expense: Transmission  
30 Deprec Expense: General Plant  
31 Depreciation Expense: Intangible Plant  
32 Amort of ITC (Acct 411.4)  
33 O&M Expense: Transmission  
34 Less Account 561 (Load Dispatching)  
35 Less: Account 565 (Transmission of Electricity By Others)  
36 O&M Expense: A&G  
37 Taxes Other than Income:  
38 Amortization of RTO Development Costs  
39 Interest Expense (Network Upgrade Prepayments)  
40 Transmission Expense  
41 Gross Transmission Revenue Requirement  
42  
43 Transmission Revenue Credits  
44  
45 Net PTP Transmission Revenue Requirement  
46

### System Peak Demand - MW

47  
48

### **Attachment 3 - Response Staff DR 16**

- 49 Annual Rate \$/kW per year
- 50 Monthly Rate \$/kW per month
- 51 Weekly Rate \$/kW per week
- 52 Daily Rate \$/kW per day (Mon-Sat)
- 53 Daily Rate \$/kW per day (Sunday)
- 54 Hourly Rate \$/MW per hour (Peak)
- 55 Hourly Rate \$/MW per hour (Off-Peak)

### Attachment 3 - Response Staff DR 16

Source	Amount
FF1 p207 58(g) - 57(g)	742,870,924
Schedule 7	(16,703,791)
	(821,682)
Schedule 9	(2,310,431)
Schedule 1	30,744,244
Schedule 1	6,961,612
FF1 p214 4d + 5d + 12d	676,535
Schedule 1	112,758
FF1 p 219 25(b) - 108.100 = 0	(230,292,212)
Schedule 7	9,787,710
Schedule 8	93,681
Schedule 1	(11,660,762)
Schedule 1	2,379,351
Schedule 1	(49,151,423)
Schedule 1	(2,555,053)
Schedule 1	1,252,469
Schedule 1	10,342,021
Schedule 1	4,644,612
OATT Attach H, 3.1.1.11(c)	\$2,384,070
Sum (1) Thru (19)	498,754,634
	0.08203
Schedule 6	0.03427
Schedule 6	0.03427
(20)*((23)+(24))	58,005,164
	14,609,825
Schedule 2	1,654,697
Schedule 2	696,024
Schedule 2	430,116
Schedule 2	23,196,223
FF1 p 321 84b to 92b	(2,883,995)
FF1 p 321 96b	(7,250,299)
Schedule 2	13,960,670
Schedule 2	3,003,630
OATT Attach H, 3.7	\$922,866
Schedule 9	<u>\$221,728</u>
Sum (29) Thru (39)	48,561,486
(25) + (40)	106,566,650
	(17,510,193)
Schedule 4	(17,510,193)
(41) - (43)	89,056,456
	5,627
Schedule 5	5,627

### Attachment 3 - Response Staff DR 16

(45)/((47)*1000)	15.83	100%
(49) / 12	1.3192	100%
(49) / 52	0.3044	100%
(51) / 6	0.0507	100%
(51) / 7	0.0435	100%
(49)*1000 / 4896	3.23	100%
(49)*1000 / 8760	1.81	100%

**Attachment 3 - Response Staff DR 16**

IDAHO POWER COMPANY  
Transmission Cost of Service Rate Development  
12 Months Ended 12/31/2008

**SCHEDULE 5**  
Allocation Demand and Capability Data  
2008

	A	B	C	D	E	F	G
	Firm Network Service for Self (D) - (B) - (C)	Firm Network Service for Others	Long-Term Firm PTP Reservations	TOTAL Form 1p400(b) 1/	Legacy Agreements 2/	CBM	TOTAL
January	2443	241	677	3361	2014	330	5705
February	2252	204	677	3133	2014	330	5477
March	2004	179	677	2860	2014	330	5204
April	1854	183	696	2743	2014	330	5087
May	2334	284	696	3314	2014	330	5658
June	3200	344	696	4240	2014	330	6584
July	3116	349	696	4161	2014	330	6505
August	2978	293	696	3967	2014	330	6311
September	1709	199	696	2604	2014	330	4948
October	1981	189	696	2866	2014	330	5210
November	1901	243	696	2840	2014	330	5184
December	2293	313	696	3302	2014	330	6646
12 CP (Rounded)	2339	252	691	3283	2014	330	5627

1/ Does not include Short Term Firm PTP Reservations reported on Column (f), page 400 of the Form 1.

2/ RTSA = 1,514 MW; ITSA = 250 MW; TFA = 250 MW

	Firm Network Service For Others				Total Form 1
	Imnaha	USBR	Raft River	BPA - PF	
January	0.48209	1	13	144	241
February	0.34944	1	11	126	204
March	0.33614	0	11	107	179
April	0.30583	9	11	100	183
May	0.18809	57	60	118	284
June	0.27706	72	66	144	344
July	0.32431	73	69	144	349
August	0.29120	51	54	129	293
September	0.19845	31	40	86	199
October	0.17871	30	29	89	189
November	0.32844	59	12	113	243
December	0.50820	82	12	136	313
12 CP (Rounded)	0	39	32	120	252

	Long-Term Firm Transmission - OASIS Reservations										
	IPCM	IPCM	IPCM	IPCM	IPCM	IPCM	IPCM	IPCM	SCL	PAC	TOTAL
OASIS Ref:	70237874 (79606)	96618	70241483 (144434)	70752544 (143190)	70386764 (70361498) & 70865456	71153438 (70416899) &(144968)	70237836 & 70592430	71195969	71331211	70287097	
contract term	4/1/01- 12/31/2010	7/1/01-12/31/09	4/1/04-04/01/2010	7/1/04- 6/30/2010	5/1/05-5/1/06 & 5/1/06-5/1/2011	3/1/2007- 12/31/2010 (9/1/05-3/1/07) BOBR/PCO	6/1/06-6/1/2010	4/1/2007- 4/1/2008	1/1/2008- 1/1/2009	4/1/2008- 4/1/2009	
POR/POD	IPCO/LGBP	IPCO/M345	IPCO/LGBP	JEFF/IPCO	IPCO/LOLO		IPCO/MLCK	BOBR/JEFF	LYPK/LGBP	KPRT/BOBR	
January	171	25	75	87	75	75	30	42	97	0	677
February	171	25	75	87	75	75	30	42	97	0	677
March	171	25	75	87	75	75	30	42	97	0	677
April	171	25	75	87	75	75	30	0	97	61	696
May	171	25	75	87	75	75	30	0	97	61	696
June	171	25	75	87	75	75	30	0	97	61	696
July	171	25	75	87	75	75	30	0	97	61	696
August	171	25	75	87	75	75	30	0	97	61	696
September	171	25	75	87	75	75	30	0	97	61	696
October	171	25	75	87	75	75	30	0	97	61	696
November	171	25	75	87	75	75	30	0	97	61	696
December	171	25	75	87	75	75	30	0	97	61	696
12 CP (Rounded)	171	25	75	87	75	75	30	11	97	46	691

**Attachment 3 - Response Staff DR 16**

IDAHO POWER COMPANY  
Transmission Cost of Service Rate Development  
12 Months Ended 12/31/2008

**SCHEDULE 4 WORKPAPER, PAGE 1**  
**Account 454 Rents From Electric Property by Category and Subaccount**  
**2008**

Subaccount and Category (Source of Rent) A	Total Amount B	Treatment: Amount Revenue Credited C	Nature of Each Source of Rent Comments D
<b>454101, 454102</b>			
		\$0	Distribution-related facilities charges
Real Estate Rents	330,651	\$48,669	See Schedule 4 Workpaper, page 2
Joint Pole Rents	1,505,132	\$254,803	See Schedule 4 Workpaper, page 3
Cogeneration	546,786	\$42,534	See Schedule 4 Workpaper, page 4
General Business Facilities Charges	6,561,032	\$0	Distribution-related facilities charges under Sch 66- (optional distribution services) such as devices for off-site meter reading; Schedules 9, 19, St. Ltg., Dusk to Dawn, etc
<b>Subtotal</b>	<b>\$8,943,600</b>	<b>\$346,006</b>	To Schedule 4, lines 4, 5 and 6
<b>454001, 454003, 454004, 454702</b>			
Overnight Park Rents	327,242	\$0	Power Supply-related. These fees are for the usage of recreational parks located at hydroelectric power plants owned by the Company
<b>Subtotal</b>	<b>\$327,242</b>	<b>\$0</b>	
<b>454181, 454281</b>			
Fiber Rents	447,361	\$0	Fiber Rents - Non-transmission as per settlement
<b>Subtotal</b>	<b>\$447,361</b>	<b>\$0</b>	
<b>454251, 454271</b>			
Restated Transmission Services Agreement Between IPC and PacifiCorp dated February 6, 1992	6,650,862	\$0	Legacy Agreement-Transmission facilities charges
Transmission Facilities Agreement between IPC, PP&L and UP&L, dated June 1, 1974	2,055,220	\$0	Legacy Agreement-Transmission facilities charges
Agreement for Interconnection and Transmission Services between IPC and UP&L dated March 19, 1982	377,345	\$0	Legacy Agreement-Transmission facilities charges
Transmission Services Agreement between IPC and the City of Seattle dated June 27, 1988.	-	\$0	Legacy Agreement-Transmission facilities charges - Contract expired
Section 3 of the Microwave Cooperative Use Agreement dated August 2, 1974, between PacifiCorp and Idaho Power Company	15,395	\$0	Communication service
Section 3.1 of the Communications Agreement between Idaho Power Company and PacifiCorp dated February 20, 1996	\$55,284	\$0	Communication service
<b>Subtotal</b>	<b>9,154,106</b>	<b>\$0</b>	
<b>TOTAL ACCOUNT 454</b>	<b>\$18,872,309</b>	<b>\$346,006</b>	Source = the Form 1, page 300
<b>TOTAL AMOUNT REVENUE CREDITED</b>		<b>\$346,006</b>	To Schedule 4

	1-4	1-2	2-4	2-4 Wind & Peakers	1-4 Base Case	1-2 no B2H
Idaho Power 1-4 Boardman to Herr 1-2 Gas Peaker						
0%	2.0199	2.2814	2.59989	2.6158970	\$4.6198125718	\$4.8972495098
5%	2.0462	2.2814	2.59989	2.6158970	\$4.6460625718	\$4.8972495098
10%	2.0724	2.2814	2.59989	2.6158970	\$4.6723125718	\$4.8972495098
15%	2.0987	2.2814	2.59989	2.6158970	\$4.6985625718	\$4.8972495098
20%	2.1249	2.2814	2.59989	2.6158970	\$4.7248125718	\$4.8972495098
25%	2.1512	2.2814	2.59989	2.6158970	\$4.7510625718	\$4.8972495098
30%	2.1774	2.2814	2.59989	2.6158970	\$4.7773125718	\$4.8972495098
35%	2.2037	2.2814	2.59989	2.6158970	\$4.8035625718	\$4.8972495098
40%	2.2299	2.2814	2.59989	2.6158970	\$4.8298125718	\$4.8972495098
45%	2.2562	2.2814	2.59989	2.6158970	\$4.8560625718	\$4.8972495098
50%	2.2824	2.2814	2.59989	2.6158970	\$4.8823125718	\$4.8972495098
55%	2.3087	2.2814	2.59989	2.6158970	\$4.9085625718	\$4.8972495098
60%	2.3349	2.2814	2.59989	2.6158970	\$4.9348125718	\$4.8972495098
65%	2.3612	2.2814	2.59989	2.6158970	\$4.9610625718	\$4.8972495098
70%	2.3874	2.2814	2.59989	2.6158970	\$4.9873125718	\$4.8972495098
75%	2.4137	2.2814	2.59989	2.6158970	\$5.0135625718	\$4.8972495098
80%	2.4399	2.2814	2.59989	2.6158970	\$5.0398125718	\$4.8972495098
85%	2.4662	2.2814	2.59989	2.6158970	\$5.0660625718	\$4.8972495098
90%	2.4924	2.2814	2.59989	2.6158970	\$5.0923125718	\$4.8972495098
95%	2.5187	2.2814	2.59989	2.6158970	\$5.1185625718	\$4.8972495098
100%	2.5449	2.2814	2.59989	2.6158970	\$5.1448125718	\$4.8972495098

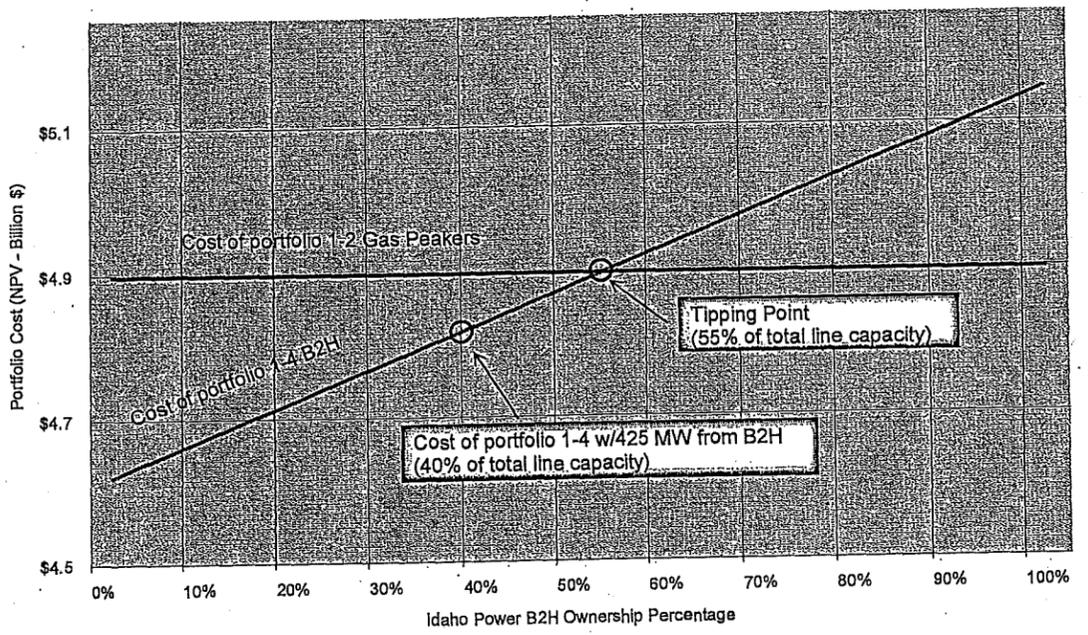
Source: 2009 IRP Appendix C Page 16. 1-4 B2H Expected Portfolio Cost.

Source: 2009 IRP Appendix C Page 16. 1-2 Gas (Peaker) Expected Portfolio Cost.

Source: 2009 IRP Appendix C Page 20. 2-4 Wind & Peakers Expected Portfolio Cost.

Source: Original Aurora run for tipping chart. All previous 11-20 year runs had B2H. Removed B2H from NTTG long term plan in Aurora and re-ran 2-4 with 1-2 starting point.

\$ 210.00 Million 40% B2H NPV  
 \$ 525.00  
 0.5250 \$ 525.00 check  
 \$ 210.00 check  
 0.2100  
 Line Slope 0.0263



40% of transmission capacity Idaho Power Subscription B2H				NPV Outbound Sold	NPV Outbound Not Sold
Year	Portfolio 1-4 (425 MW) Fully Subscribed	Outbound not sold Fully Subscribed			
2010	0	0	0	0	0
2011	0	0	0	0	0
2012	0	0	0	0	0
2013	0	0	0	0	0
2014	0	0	0	0	0
2015	\$ 16,520,081	\$ 32,261,593	0	0	0
2016	\$ 16,520,081	\$ 32,261,593	0	0	0
2017	\$ 16,520,081	\$ 32,261,593	0	0	0
2018	\$ 16,520,081	\$ 32,261,593	0	0	0
2019	\$ 16,520,081	\$ 32,261,593	0	\$48,365,600	\$94,451,794
2020	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2021	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2022	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2023	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2024	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2025	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2026	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2027	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2028	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2029	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	\$59,148,872.33
	\$107,514,472.11	\$209,961,933.05		\$107,514,472.11	\$209,961,933.05

### Attachment 4 - Response Staff DR 16

Idaho Power Own	1-4 Boardman to Hemingway				1-2 Gas Peaker			2-4 Wind & Peakers			1-2 no B2H			1-4 Boardman to Hemingway	1-2 Gas Peaker	1-4 high B2H\$ + 2-4 Low gas	1-2 Low gas + 2-4 Low Gas no B2H\$	1-4 exp B2H\$ High gas + 2-4 High gas	1-2 High gas + 2-4 High gas no B2H\$	1-4 exp T Low gas + 2-4 Low Gas	1-2 LowGas + 2-4 Low gas no B2H\$	
	1-4 IRP	1-4 HI B2H\$	1-4 HI gas HI B2H\$	1-4 HI gas	1-4 Low gas	1-2 Exp Gas	1-2 HI Gas	1-2 Low Gas	2-4 exp gas	2-4 HI gas	2-4 Low gas	2-4 Exp gas	2-4 HI Gas	2-4 Low Gas	Case	1-2 + 2-4 (1:2 no B2H\$)	1-4 high B2H\$ + 2-4 Low gas	1-2 Low gas + 2-4 Low Gas no B2H\$	1-4 exp B2H\$ High gas + 2-4 High gas	1-2 High gas + 2-4 High gas no B2H\$	1-4 exp T Low gas + 2-4 Low Gas	1-2 LowGas + 2-4 Low gas no B2H\$
0%	2.0199	2.0199	1.9822	1.9822	2.1959	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.6198	4.8984	4.33889	4.76467	4.75772	4.93559	4.51486	4.76467
5%	2.0462	2.0552	2.0174	2.0084	2.2221	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.6461	4.8984	4.37414	4.76467	4.79297	4.93559	4.54111	4.76467
10%	2.0724	2.0904	2.0527	2.0347	2.2484	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.6723	4.8984	4.40939	4.76467	4.82822	4.93559	4.56736	4.76467
15%	2.0987	2.1257	2.0879	2.0609	2.2746	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.6986	4.8984	4.44464	4.76467	4.86347	4.93559	4.59361	4.76467
20%	2.1249	2.1609	2.1232	2.0872	2.3009	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.7248	4.8984	4.47989	4.76467	4.89872	4.93559	4.61986	4.76467
25%	2.1512	2.1962	2.1584	2.1134	2.3271	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.7511	4.8984	4.51514	4.76467	4.93397	4.93559	4.64611	4.76467
30%	2.1774	2.2314	2.1937	2.1397	2.3534	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.7773	4.8984	4.55039	4.76467	4.96922	4.93559	4.67236	4.76467
35%	2.2037	2.2667	2.2289	2.1659	2.3796	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.8036	4.8984	4.58564	4.76467	5.00447	4.93559	4.69861	4.76467
40%	2.2299	2.3019	2.2642	2.1922	2.4059	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.8298	4.8984	4.62089	4.76467	5.03972	4.93559	4.72486	4.76467
45%	2.2562	2.3372	2.2994	2.2184	2.4321	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.8561	4.8984	4.65614	4.76467	5.07497	4.93559	4.75111	4.76467
50%	2.2824	2.3724	2.3347	2.2447	2.4584	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.8823	4.8984	4.69139	4.76467	5.11022	4.93559	4.77736	4.76467
55%	2.3087	2.4077	2.3699	2.2709	2.4846	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.9086	4.8984	4.72664	4.76467	5.14547	4.93559	4.80361	4.76467
60%	2.3349	2.4429	2.4052	2.2972	2.5109	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.9348	4.8984	4.76189	4.76467	5.18072	4.93559	4.82986	4.76467
65%	2.3612	2.4782	2.4404	2.3234	2.5371	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.9611	4.8984	4.79714	4.76467	5.21597	4.93559	4.85611	4.76467
70%	2.3874	2.5134	2.4757	2.3497	2.5634	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	4.9873	4.8984	4.83239	4.76467	5.25122	4.93559	4.88238	4.76467
75%	2.4137	2.5487	2.5109	2.3759	2.5896	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.0136	4.8984	4.86764	4.76467	5.28647	4.93559	4.90861	4.76467
80%	2.4399	2.5839	2.5482	2.4022	2.6159	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.0398	4.8984	4.90289	4.76467	5.32172	4.93559	4.93486	4.76467
85%	2.4662	2.6192	2.5814	2.4284	2.6421	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.0661	4.8984	4.93814	4.76467	5.35697	4.93559	4.96111	4.76467
90%	2.4924	2.6544	2.6167	2.4547	2.6684	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.0923	4.8984	4.97339	4.76467	5.39222	4.93559	4.98736	4.76467
95%	2.5187	2.6897	2.6519	2.4809	2.6946	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.1186	4.8984	5.00864	4.76467	5.42747	4.93559	5.01361	4.76467
100%	2.5449	2.7249	2.6872	2.5072	2.7209	2.2814	2.23770	2.25445	2.59989	2.73780	2.31897	2.61701	2.69789	2.51022	5.1448	4.8984	5.04389	4.76467	5.46272	4.93559	5.03986	4.76467

Source: 2009 IRP Appendix C Page 16. 1-4 B2H Expected Portfolio Cost.

Source: 2009 IRP Appendix C Page 16. 1-2 Gas (Peaker)

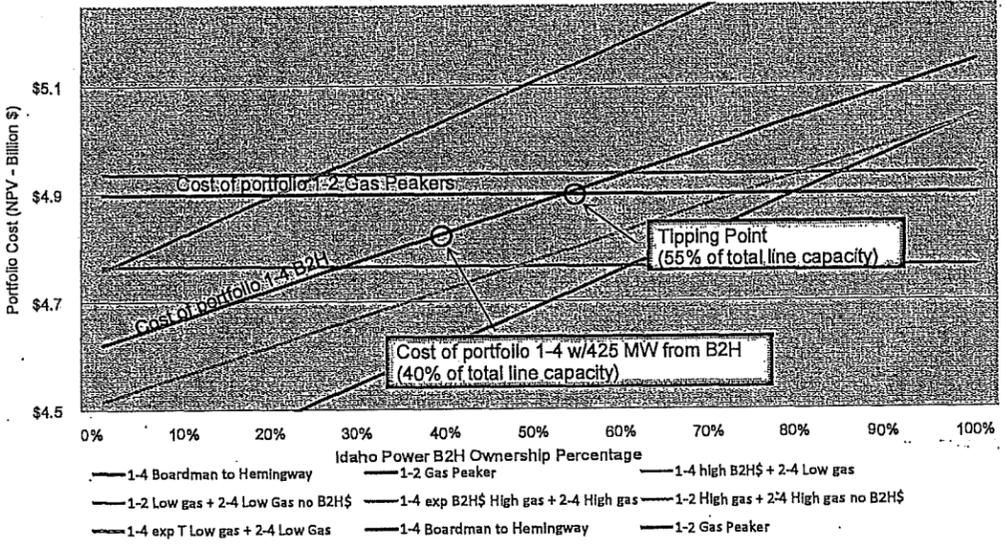
Source: 2009 IRP Appendix C Page 20. 2-4 Wind & Peakers

Source: Original Aurora run for tipping chart. All previous 11-20 year runs had B2H. Removed B2H from NTTG long term plan

\$	210.00	\$	282.00
0.5250	\$ 525.00	\$	705.00
	\$ 525.00	\$	705.00
0.2100	\$ 210.00	\$	282.00
Line Slope	0.0263		0.0353

Million 40% B2H NPV  
check  
check

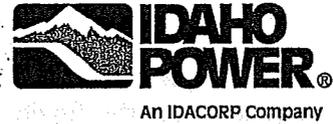
OPUC LC-50 DR 16 Tipping Point Chart



Year	40% of transmission capacity Idaho Power Subscription B2H			
	Portfolio 1-4 (425 MW) Fully Subscribed	Outbound not so Portfolio 1-4 (425 MW) Fully Subscribed	Portfolio 1-4 (425 MW) Fully Subscribed	Outbound not so Portfolio 1-4 (425 MW) Fully Subscribed
2010	0	0	0	0
2011	0	0	0	0
2012	0	0	0	0
2013	0	0	0	0
2014	0	0	0	0
2015	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2016	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2017	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2018	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2019	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2020	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2021	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2022	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2023	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2024	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2025	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2026	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2027	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2028	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
2029	\$ 16,520,081	\$ 32,261,593	\$ 21,667,625	\$ 43,335,250
<b>Total</b>	<b>\$107,514,472</b>	<b>\$209,961,933</b>	<b>\$141,015,246</b>	<b>\$282,030,492</b>

**Attachment 4 - Response Staff DR 16**

Total	Average	2019	17536040	\$277,407.80	1_1_Solar_co	151,117.35
Resource	Average	2010	17159560	\$261,559.30	1_2_FrPeake	261,559.30
Market	Average	2010	1128667	\$53,579.92	1_2_FrPeake	53,579.92
Market	Average	2010	-2544337	(\$97,316.15)	1_2_FrPeake	(97,316.15)
Total	Average	2010	15743890	\$217,823.00	1_2_FrPeake	217,823.00
Resource	Average	2011	18038060	\$295,494.20	1_2_FrPeake	276,208.71
Market	Average	2011	1050100	\$58,780.12	1_2_FrPeake	54,943.82
Market	Average	2011	-2718065	(\$122,566.50)	1_2_FrPeake	(114,567.17)
Total	Average	2011	16370090	\$231,707.80	1_2_FrPeake	216,585.34
Resource	Average	2012	18290560	\$328,161.00	1_2_FrPeake	286,723.83
Market	Average	2012	772394.4	\$45,931.30	1_2_FrPeake	40,131.51
Market	Average	2012	-2314695	(\$113,407.90)	1_2_FrPeake	(99,087.79)
Total	Average	2012	16748260	\$260,684.40	1_2_FrPeake	227,767.55
Resource	Average	2013	18495790	\$339,375.50	1_2_FrPeake	277,169.67
Market	Average	2013	852710	\$54,407.82	1_2_FrPeake	44,435.14
Market	Average	2013	-2475884	(\$129,301.40)	1_2_FrPeake	(105,601.10)
Total	Average	2013	16872620	\$264,481.90	1_2_FrPeake	216,003.70
Resource	Average	2014	18569900	\$356,520.00	1_2_FrPeake	272,168.29
Market	Average	2014	858983.3	\$57,454.79	1_2_FrPeake	43,861.14
Market	Average	2014	-2374586	(\$128,891.90)	1_2_FrPeake	(98,396.41)
Total	Average	2014	17054290	\$285,082.90	1_2_FrPeake	217,633.03
Resource	Average	2015	18503020	\$360,076.50	1_2_FrPeake	256,943.02
Market	Average	2015	1028096	\$69,637.57	1_2_FrPeake	49,691.91
Market	Average	2015	-2382082	(\$130,833.40)	1_2_FrPeake	(93,359.96)
Total	Average	2015	17149040	\$298,880.60	1_2_FrPeake	213,274.91
Resource	Average	2016	19198870	\$375,120.00	1_2_FrPeake	250,207.70
Market	Average	2016	815253.7	\$57,476.00	1_2_FrPeake	38,336.90
Market	Average	2016	-2737902	(\$155,396.80)	1_2_FrPeake	(103,650.77)
Total	Average	2016	17276220	\$277,199.20	1_2_FrPeake	184,893.83
Resource	Average	2017	19044810	\$380,628.00	1_2_FrPeake	237,311.94
Market	Average	2017	837436.4	\$60,801.53	1_2_FrPeake	37,908.22
Market	Average	2017	-2541880	(\$151,676.50)	1_2_FrPeake	(94,566.47)
Total	Average	2017	17340360	\$289,753.00	1_2_FrPeake	180,653.67
Resource	Average	2018	19060130	\$391,090.60	1_2_FrPeake	227,921.16
Market	Average	2018	837256.8	\$63,171.17	1_2_FrPeake	36,815.12
Market	Average	2018	-2456986	(\$151,863.90)	1_2_FrPeake	(88,503.78)
Total	Average	2018	17440400	\$302,397.90	1_2_FrPeake	176,232.51
Resource	Average	2019	18883990	\$394,599.20	1_2_FrPeake	214,957.14
Market	Average	2019	1013860	\$77,438.66	1_2_FrPeake	42,184.56
Market	Average	2019	-2361809	(\$150,986.70)	1_2_FrPeake	(82,249.71)
Total	Average	2019	17536040	\$321,051.10	1_2_FrPeake	174,891.96



April 21, 2010

Subject: Docket No. LC 50  
Idaho Power Company's **SUPPLEMENTAL** Response to Staff's Data Request 16

**STAFF'S DATA REQUEST NO. 16:**

The original Data Request No. 16 was stated as follows:

*Please conduct a construction cost risk analysis for the Boardman to Hemingway transmission line. This analysis should include a "tipping point" calculation with regard to portfolio 1-2. At a minimum, this risk analysis should include the following scenarios: worst case construction costs in portfolio 1-4 vs. low natural gas prices in portfolio 1-2, best case construction costs in 1-4 vs. high natural gas prices in 1-2, and best case construction costs in 1-4 vs. low natural gas prices in 1-2. Please provide your analysis in an Excel workbook with all formula's intact and references cited.*

During a follow-up phone conversation with OPUC Staff on April 7, 2010, the following additional information was requested:

1. Update the B2H construction cost estimate to include more typical values for AFUDC; include substation costs, evaluate a high transmission cost scenario, and provide an updated the tipping point chart.
2. Provide a description of benefits of the B2H transmission line that could not be captured in the IRP analysis using the AURORA model.

**IDAHO POWER COMPANY'S SUPPLEMENTAL RESPONSE TO STAFF'S DATA REQUEST NO. 16:**

An updated tipping point chart showing additional scenarios is attached as well as the data used to create the chart.

While the AURORA model simulates the total cost of any particular portfolio of resources, there are intangible benefits of having additional transmission capacity available that the AURORA model is not able to capture and/or quantify. In addition, these benefits would help many utilities, independent power producers, and, ultimately, customers throughout the region, not just Idaho

Power Company ("Idaho Power" or "Company"). Idaho Power sees these benefits as falling into three categories: (1) the flexibility to access multiple resources, (2) the integration of renewable resources, and (3) greater reliability/availability.

When compared to a supply-side resource, additional transmission capacity provides more flexibility and greater optionality. Idaho Power's primary market interaction is with other participants at the Mid-C market hub. The Mid-C market has historically been a very liquid market due to the large number of participants, and the large amount of hydroelectric generation in the region has typically kept market prices lower than other markets. In addition, Idaho Power experiences peak loads during the summer months when most other Pacific Northwest utilities peak in the winter. This seasonal differential allows Idaho Power to benefit from additional generation capacity in the Northwest during the summer months, while winter peaking utilities benefit during the winter months.

The ability to purchase electricity from multiple sources in the market inherently contains less risk than building a single resource. A natural gas resource will be subject to gas price risk and volatility, and renewable resources have increased risk due to integration issues. In comparison, a market purchase is a firm source of supply that can be purchased short-term or long-term. Market prices will be subject to the previously mentioned risk factors, but the diversity of resources selling into the market will mitigate the level of risk.

Increased transmission capacity to the Pacific Northwest would also give Idaho Power the option of siting resources to the northwest of its service area. This option is not currently available because of existing transmission constraints. While the Boardman to Hemingway ("B2H") transmission line appears to be the best option for serving near-term needs, in the future Idaho Power would expect to add additional supply-side resources as part of maintaining a balanced portfolio and the ability to consider Pacific Northwest resources would benefit Idaho Power's customers. In addition, increased transmission capacity would allow Idaho Power to consider joint resource development with other utilities in the Pacific Northwest.

The construction of the B2H transmission line will be important for the integration of renewable resources. Without an increase in the available transmission capacity between Idaho and the Pacific Northwest, the development of innovative, market-based solutions for integrating renewable resources within the region will not happen as quickly or effectively as it would in a deeper market, with more participants, across a more diverse geographic region. If transmission constraints prevent parties from participating in intra-hour energy and capacity transactions as postulated, the whole region will suffer. However, if there is sufficient transmission capacity available and innovative market-based solutions become a reality, then the region will be well-positioned to support a larger penetration level of renewable resources. The entire region would benefit from the associated economic development that would take place with the construction of additional renewable resources.

Regarding reliability, the transmission path will achieve a rating which accounts for system outages and provides for a reliable and "safe" operating condition. The path will be scheduled to the rating limit at times during the year. However, it is likely that the path will be well below this limit during many hours of the year. One could conclude that the system will be substantially more reliable with the addition of B2H during the operating conditions of reduced path utilization (periods other than Idaho Power's summer peak). In addition, transmission lines have a greater availability than generation facilities. A 500 kV transmission line will typically experience 19.4 forced outage-hours per year (source: *NERC 2008 Transmission Availability Data System Report*). Note that NERC only tracks automatic outages which cause the circuit to change from an in-service to out-of-service condition unrelated to a scheduled maintenance outage. A combined-cycle natural gas

facility will have an equivalent forced outage rate demand ("EFORd") of 534 hours per year (source: *NERC 2004-2008 Generating Unit Statistical Brochure-Generator Availability Data System*). Generation facilities also typically require substantially more scheduled maintenance hours than transmission lines, which further demonstrates that a transmission line will have greater availability and thus provide greater system reliability.

## Attachment - Supplemental Response Staff DR 16

	1-4	1-2	2-4	2-4 Wind & Peakers 1-2 no B2H	1-4 + 2-4 Base Case 1-4 Boardman to Hemin	1-2 + 2-4 (1-2 no B2H) 1-2 Gas Peaker
Idaho Powe	1-4 Boardman to Hem	1-2 Gas Peaker	2-4 Wind & Peakers	2-4 Wind & Peakers 1-2 no B2H	1-4 Boardman to Hemin	1-2 Gas Peaker
0%	2.0199	2.2814	2.59989	2.61589695	\$4.6198125718	\$4.8972495098
5%	2.0462	2.2814	2.59989	2.6158970	\$4.6460625718	\$4.8972495098
10%	2.0724	2.2814	2.59989	2.6158970	\$4.6723125718	\$4.8972495098
15%	2.0987	2.2814	2.59989	2.6158970	\$4.6985625718	\$4.8972495098
20%	2.1249	2.2814	2.59989	2.6158970	\$4.7248125718	\$4.8972495098
25%	2.1512	2.2814	2.59989	2.6158970	\$4.7510625718	\$4.8972495098
30%	2.1774	2.2814	2.59989	2.6158970	\$4.7773125718	\$4.8972495098
35%	2.2037	2.2814	2.59989	2.6158970	\$4.8035625718	\$4.8972495098
40%	2.2299	2.2814	2.59989	2.6158970	\$4.8298125718	\$4.8972495098
45%	2.2562	2.2814	2.59989	2.6158970	\$4.8560625718	\$4.8972495098
50%	2.2824	2.2814	2.59989	2.6158970	\$4.8823125718	\$4.8972495098
55%	2.3087	2.2814	2.59989	2.6158970	\$4.9085625718	\$4.8972495098
60%	2.3349	2.2814	2.59989	2.6158970	\$4.9348125718	\$4.8972495098
65%	2.3612	2.2814	2.59989	2.6158970	\$4.9610625718	\$4.8972495098
70%	2.3874	2.2814	2.59989	2.6158970	\$4.9873125718	\$4.8972495098
75%	2.4137	2.2814	2.59989	2.6158970	\$5.0135625718	\$4.8972495098
80%	2.4399	2.2814	2.59989	2.6158970	\$5.0398125718	\$4.8972495098
85%	2.4662	2.2814	2.59989	2.6158970	\$5.0660625718	\$4.8972495098
90%	2.4924	2.2814	2.59989	2.6158970	\$5.0923125718	\$4.8972495098
95%	2.5187	2.2814	2.59989	2.6158970	\$5.1185625718	\$4.8972495098
100%	2.5449	2.2814	2.59989	2.6158970	\$5.1448125718	\$4.8972495098

Source: 2009 IRP  
Appendix C Page  
16. 1-4 B2H  
Expected Portfolio  
Cost.

Source: 2009 IRP  
Appendix C Page  
16. 1-2 Gas  
(Peaker) Expected  
Portfolio Cost.

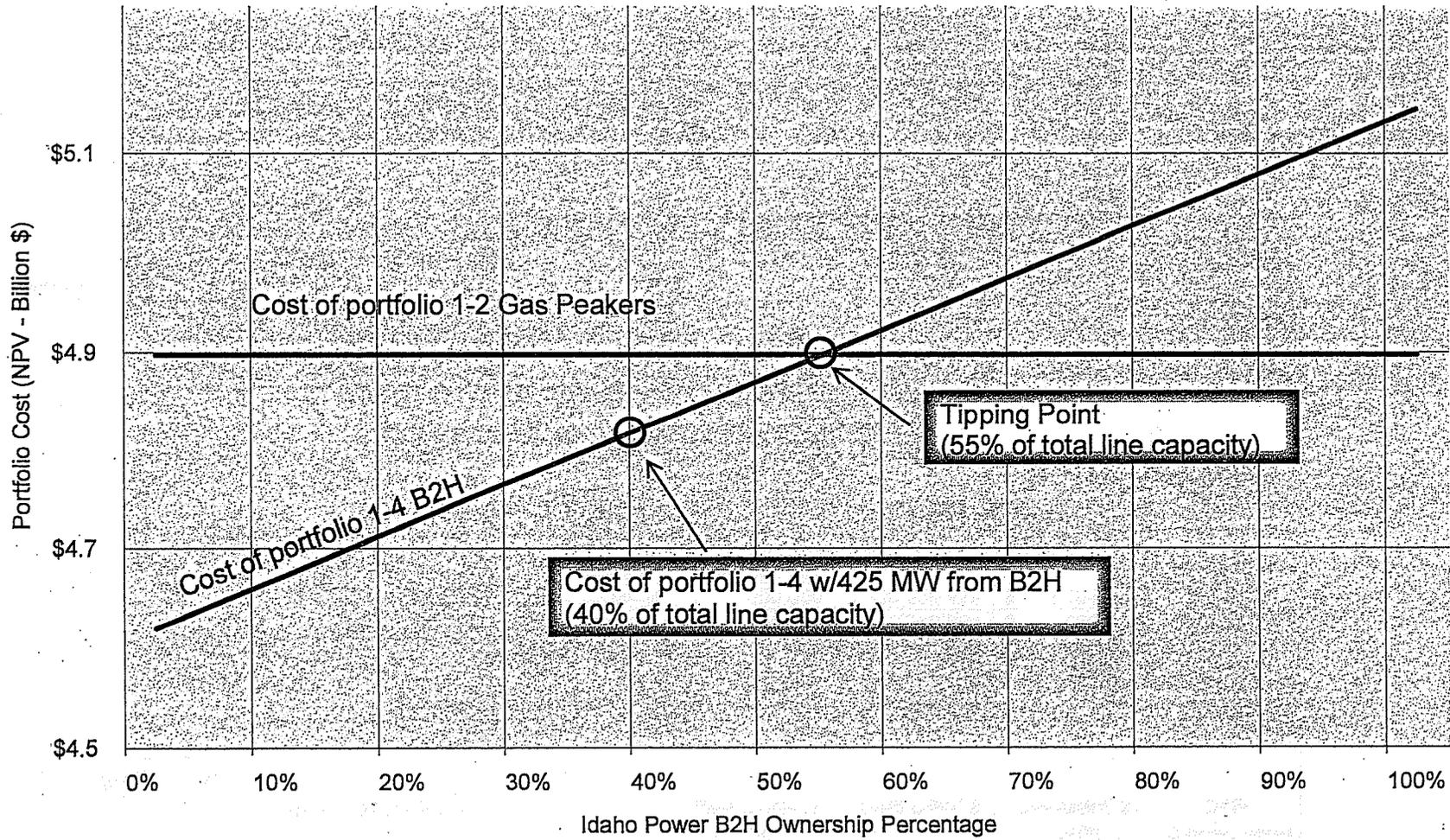
Source: 2009 IRP  
Appendix C Page  
20. 2-4 Wind &  
Peakers Expected  
Portfolio Cost.

Source: Original  
Aurora run for  
tipping chart. All  
previous 11-20  
year runs had  
B2H. Removed  
B2H from NTTG  
long term plan in  
Aurora and re-  
ran 2-4 with 1-2  
starting point.

\$ 210.00 Million 40% B2H NPV  
\$ 525.00  
0.5250 \$ 525.00 check  
\$ 210.00 check  
0.2100  
Line Slope  
0.0263

40% of transmission capacity Idaho Power Subscription B2H				NPV Outbound Sold	NPV outbound Not Sold
Portfolio 1-4 (425 MW)		Outbound not sold			
Fully Subscribed	Fully Subscribed				
2010	0	0	0	0	
2011	0	0	0	0	
2012	0	0	0	0	
2013	0	0	0	0	
2014	0	0	0	0	
2015	\$ 16,520,081	\$ 32,261,593	0	0	
2016	\$ 16,520,081	\$ 32,261,593	0	0	
2017	\$ 16,520,081	\$ 32,261,593	0	0	
2018	\$ 16,520,081	\$ 32,261,593	0	0	
2019	\$ 16,520,081	\$ 32,261,593	0	0	
2020	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	\$48,365,600
2021	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2022	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2023	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2024	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2025	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2026	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2027	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2028	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	
2029	\$ 16,520,081	\$ 32,261,593	\$ 16,520,081	\$ 32,261,593	\$59,148,872.33
	\$107,514,472.11	\$209,961,933.05		\$107,514,472.11	\$209,961,933.05

Attachment - Supplemental Response Staff DR 16



**Attachment - Supplemental Response Staff DR 16**

B2H IRP Estimate-High

<b>Boardman - Hemingway 500 kV Line Estimate - High</b>				
<b>Conceptual Level Project Cost Estimate</b>		Lines Contingency %:	21%	
		AFUDC %:	7%	
		Gen w/o overhead %:	10%	
March 2010		IPCo Share %:	100%	
<b>Location &amp; Description</b>	<b>Transmission Line Costs, \$</b>	<b>Total Cost, \$</b>	<b>Total Cost/Mile, \$</b>	<b>Commitment Date</b>
<u>Transmission Lines:</u>				
Boardman - Hemingway 500 kV Line				
	Line length (miles):	300		
	Permitting & Engineering Price	\$ 30,000,000	\$ 41,315,677	Apr-10
	ROW Price/mile	\$ 150,000	\$ 61,973,515	\$ 206,578 Jan-12
	Mitigation Price/mile	\$ 150,000	\$ 61,973,515	\$ 206,578 Jun-13
	Lattice Structure Material Price/mile:	\$ 500,000	\$ 206,578,384	\$ 688,595 Jun-12
	Lattice Structure Labor Price/mile:	\$ 800,000	\$ 330,525,415	\$ 1,101,751 Jun-13
	Substations	\$ 56,702,685		
	<b>Subtotal ==&gt;</b>	<b>\$ 566,702,685</b>		
	Contingency:	\$ 117,414,692		
	AFUDC:	\$ 39,669,188		
	IPC Capital work order overhead:	\$ 56,670,269		
	<b>TOTAL ESTIMATED PROJECT COST ==&gt;</b>	<b>\$ 780,456,833</b>		
	<b>TOTAL PROJECT COST/MILE ==&gt;</b>	<b>\$ 2,601,523</b>		
<u>Notes:</u>				
1. All estimates are conceptual level estimates.				
2. Commitment dates are preliminary and based on June 2015 in-service date.				

## Attachment - Supplemental Response Staff DR 16

LC 50 - DR16 High Estimate B2H

### Idaho Power Transmission Rate Approximation for 2009 IRP Analysis

Portfolio 1-4 with additional 3rd party subscription

Project	Capital Cost
B2H 19% owned by IPCo (425/2300)	\$ 110,869,565
130.08% B2H 19% owned by IPCo (425/2300)	\$ 144,214,850

450 Market Purchase		included in B2H
\$	600,000,000	Estimate used in IRP
\$	780,456,833	High Estimate for sensitivity

#### Annual Revenue Requirements

Existing Revenue Requirements.....	\$ 106,566,650
Existing Revenue Credits.....	\$ (17,510,193)
Existing Net Revenue Requirements.....	\$ 89,056,456
<b>New Project Capital</b>	<b>\$ 144,214,850</b>
Ratio of New Revenue Requirements/New Capital	0.160
New Revenue Requirements for Project(s).....	\$ 23,084,415
New Net Revenue Requirements.....	\$ 112,140,872

#### System Use (in MW)

Existing System Peak Demand.....	5,627
<b>Future additional IPC Network Use</b>	<b>425</b>
New System Demand—Including new uses.....	6,052

#### Point-To-Point Transmission Rate

a) Existing Rate—\$/kW-yr.....	\$ 15.83
b) New Rate without 3rd-Party Use—\$/kW-yr.....	\$ 18.53

#### Point-To-Point Revenue Adjustments (Incremental change to Existing Revenue Credits)

Change in existing uses (increase > 100%).....	100%
Existing uses adjusted at new rate b).....	\$ (2,990,342)

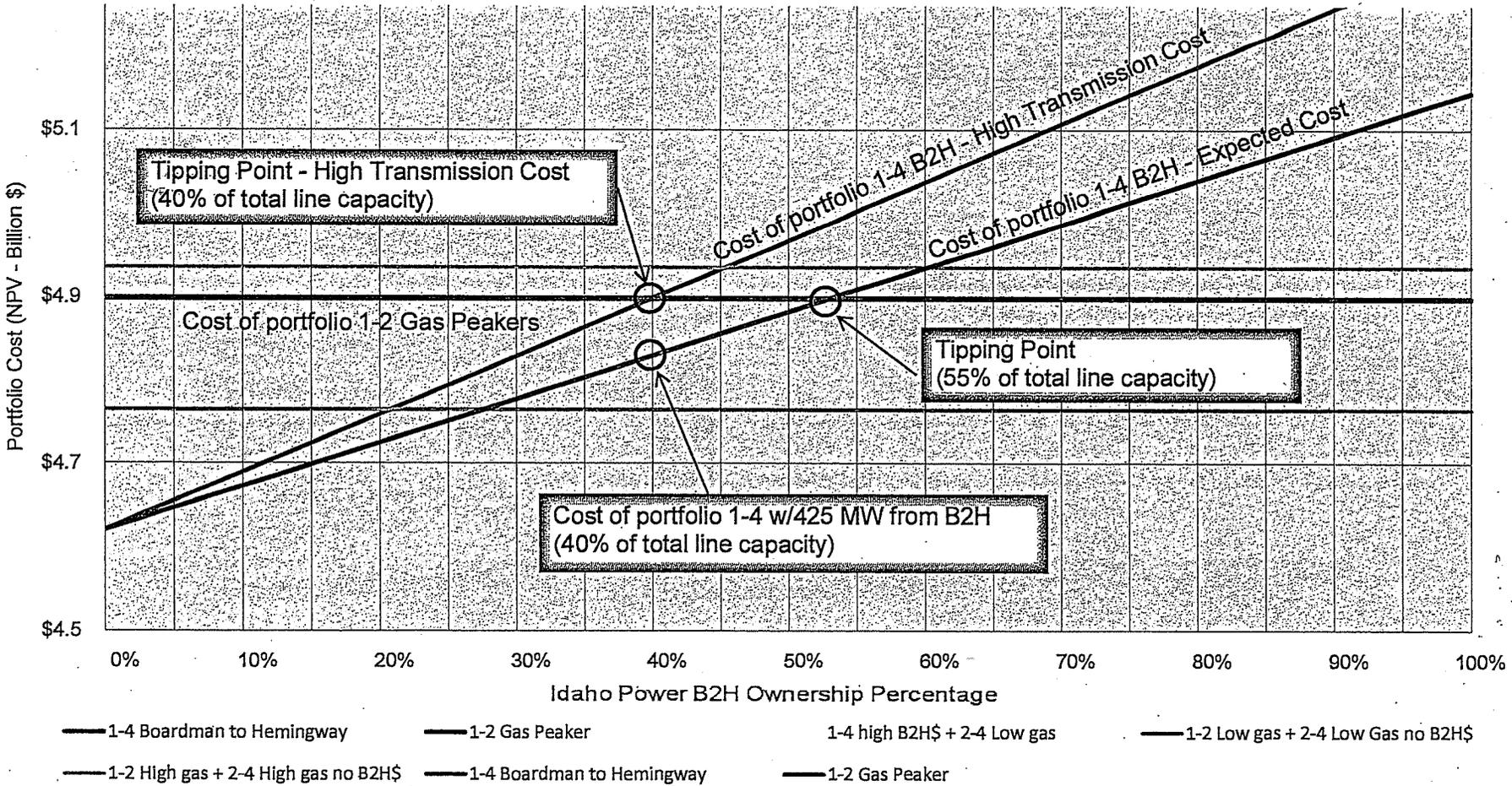
#### Network Transmission Revenue Requirements

<b>a) Existing</b>		
BPA Load Ratio Share.....	\$ 4,237,114	
Long-Term PTP Revenue.....	\$ 7,375,757	
Legacy Contract Revenue.....	\$ 6,742,822	
Assigned to IPC Retail Load Service.....	\$ 70,700,764	
<b>b) Future - B2H with additional participation</b>		
BPA Load Ratio Share.....	\$ 4,760,071	
Long-Term PTP Revenue.....	\$ 8,534,110	
Legacy Contract Revenue.....	\$ 6,742,822	
Assigned to IPC Retail Load Service.....	\$ 92,103,868	
<b>Net change</b>	<b>\$ 21,403,104</b>	High Value
Net change	\$ 16,520,080	Original Value



Attachment - Supplemental Response Staff DR 16

DR 16 Tipping Point Chart - High Transmission Cost



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Idaho Power Company's Response to  
Intervenor and Public Comments in its  
2009 Integrated Resource Plan

Exhibit No. 2

May 19, 2010

Peak-Hour	2010												2011											
	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11
<b>Load and Resource Balance</b>																								
<b>Load Forecast (95th%)—w/EE DSM</b>	(2,455)	(2,402)	(2,103)	(1,871)	(2,761)	(3,318)	(3,460)	(3,138)	(2,978)	(2,088)	(2,302)	(2,695)	(2,559)	(2,486)	(2,191)	(1,948)	(2,846)	(3,395)	(3,560)	(3,185)	(3,027)	(2,133)	(2,353)	(2,733)
Existing DSM (Irrigation Timer)	0	0	0	0	0	8	8	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0
Existing DSM (AC Cool Credit)	0	0	0	0	0	51	51	51	0	0	0	0	0	0	0	0	0	51	51	51	0	0	0	0
Total Existing Demand Response	0	0	0	0	0	59	59	51	0	0	0	0	0	0	0	0	0	57	57	51	0	0	0	0
<b>Peak-Hour Load Forecast w/Existing DSM</b>	(2,455)	(2,402)	(2,103)	(1,871)	(2,761)	(3,259)	(3,401)	(3,088)	(2,978)	(2,088)	(2,302)	(2,695)	(2,559)	(2,486)	(2,191)	(1,948)	(2,846)	(3,338)	(3,503)	(3,134)	(3,027)	(2,133)	(2,353)	(2,733)
<b>Existing Resources</b>																								
<b>Coal (w/Curtailment)</b>	963	963	963	676	621	963	967	967	967	967	967	967	967	967	967	680	790	967	972	972	972	972	972	972
Hydro (90th%)—HCC	1,131	945	670	690	1,181	1,106	1,040	945	1,035	835	600	785	1,107	900	670	690	1,179	1,110	1,035	945	1,090	780	600	785
Hydro (90th%)—Other	203	207	196	213	289	306	246	236	217	210	198	204	203	206	196	213	289	306	246	236	216	210	198	204
Sho-Ban Water Lease	0	0	0	0	0	0	42	0	0	0	0	0	0	0	0	0	0	0	47	0	0	0	0	0
<b>Total Hydro</b>	1,335	1,152	866	903	1,470	1,413	1,328	1,181	1,252	1,045	798	989	1,310	1,106	866	903	1,467	1,416	1,328	1,181	1,306	990	798	989
<b>CSPP (PURPA)</b>	43	42	46	70	121	129	133	124	102	82	58	55	52	51	54	79	129	138	141	132	110	82	58	55
<b>Power Purchase Agreements</b>																								
Elkhorn Valley Wind	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Raft River Geothermal	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
PPL Montana—Jefferson (83 MW)	0	0	0	0	0	83	83	83	0	0	0	0	0	0	0	0	0	83	83	83	0	0	0	0
East Side Purchase (50 MW)	0	0	0	0	0	0	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mead Purchase	0	0	0	0	0	0	75	75	0	0	0	0	0	0	0	0	0	0	75	75	0	0	0	0
<b>Total Power Purchase Agreements</b>	15	15	15	15	15	98	223	223	15	15	15	15	15	15	15	15	15	98	173	173	15	15	15	15
<b>Firm Pacific NW Import Capability</b>	99	229	212	205	414	302	122	255	291	0	535	443	216	346	288	270	406	287	105	247	287	73	530	440
<b>Gas Peakers</b>	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416
<b>Subtotal</b>	2,871	2,816	2,518	2,286	3,057	3,321	3,190	3,166	3,042	2,526	2,789	2,885	2,976	2,901	2,606	2,363	3,223	3,322	3,135	3,121	3,106	2,548	2,790	2,887
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	(212)	0	0	0	0	0	0	0	0	0	0	(17)	(368)	(13)	0	0	0	0
<b>2006 IRP Resources</b>																								
2012 Wind RFP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Langley Gulch	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Geothermal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Geothermal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	0	(212)	0	0	0	0	0	0	0	0	0	0	(17)	(368)	(13)	0	0	0	0
<b>2009 IRP DSM</b>																								
Commercial (FlexPeak)	0	0	0	0	0	40	40	40	0	0	0	0	0	0	0	0	0	45	45	45	0	0	0	0
Irrigation Peak Rewards	0	0	0	0	0	212	212	0	0	0	0	0	0	0	0	0	0	244	244	0	0	0	0	0
Energy Efficiency Peak Reduction	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3
<b>Total New DSM Peak Reduction</b>	3	3	3	3	3	254	254	42	3	3	3	3	3	7	7	7	7	296	296	52	7	7	7	7
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(71)	0	0	0	0	0
<b>2009 IRP Resources</b>																								
2015 Boardman—Hemingway Transmission																								
2015 Shoshone Falls Upgrade (49 MW)																								
2017 Boardman—Hemingway Transmission																								
2020 Large Aero (100 MW)																								
2022 Wind (100 MW)																								
2024 Large Aero (2 X 100 MW)																								
2025 Gateway West Transmission																								
2026 Large Aero (2 X 100 MW)																								
2027 Wind (2 X 200 MW)																								
2028 Large Aero (4 X 100 MW)																								
2029 Large Aero (5 X 100 MW)																								
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(71)	0	0	0	0	0

Peak-Hour	2012												2013											
	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	Jul-12	Aug-12	Sep-12	Oct-12	Nov-12	Dec-12	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13
<b>Load and Resource Balance</b>																								
<b>Load Forecast (95th%)—w/EE DSM</b>	(2,600)	(2,487)	(2,225)	(1,964)	(2,891)	(3,496)	(3,636)	(3,242)	(3,069)	(2,168)	(2,391)	(2,756)	(2,560)	(2,496)	(2,203)	(1,922)	(2,915)	(3,541)	(3,726)	(3,296)	(3,127)	(2,177)	(2,389)	(2,703)
Existing DSM (Irrigation Timer)	0	0	0	0	0	6	6	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0
Existing DSM (AC Cool Credit)	0	0	0	0	0	51	51	51	0	0	0	0	0	0	0	0	0	51	51	51	0	0	0	0
Total Existing Demand Response	0	0	0	0	0	57	57	51	0	0	0	0	0	0	0	0	0	57	57	51	0	0	0	0
<b>Peak-Hour Load Forecast w/Existing DSM</b>	(2,600)	(2,487)	(2,225)	(1,964)	(2,891)	(3,440)	(3,579)	(3,192)	(3,069)	(2,168)	(2,391)	(2,756)	(2,560)	(2,496)	(2,203)	(1,922)	(2,915)	(3,484)	(3,669)	(3,246)	(3,127)	(2,177)	(2,389)	(2,703)
<b>Existing Resources</b>																								
<b>Coal (w/Curtailment)</b>	972	972	933	663	751	972	978	978	978	978	978	978	978	978	907	0	744	978	983	983	789	670	983	983
Hydro (90th%)—HCC	1,106	897	670	690	1,170	1,056	1,035	945	1,090	780	510	785	1,116	870	670	670	1,170	1,060	1,034	945	1,035	780	600	870
Hydro (90th%)—Other	203	206	196	213	289	306	245	235	216	210	198	203	202	206	195	213	289	306	245	234	216	210	198	203
Sho-Ban Water Lease	0	0	0	0	0	0	48	0	0	0	0	0	0	0	0	0	0	0	48	0	0	0	0	0
<b>Total Hydro</b>	1,308	1,103	866	903	1,459	1,363	1,328	1,180	1,306	990	708	988	1,319	1,076	865	883	1,459	1,366	1,327	1,179	1,251	990	798	1,073
<b>CSPP (PURPA)</b>	52	51	54	79	129	138	141	132	110	82	58	55	52	51	54	79	129	138	141	132	110	82	58	55
<b>Power Purchase Agreements</b>																								
Elkhorn Valley Wind	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Raft River Geothermal	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
PPL Montana—Jefferson (83 MW)	0	0	0	0	0	0	83	83	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Side Purchase (50 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mead Purchase	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Power Purchase Agreements</b>	15	15	15	15	15	15	98	98	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
<b>Firm Pacific NW Import Capability</b>	254	348	317	160	396	263	97	240	284	102	528	437	197	377	290	254	389	248	87	234	278	106	525	443
<b>Gas Peakers</b>	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416
<b>Subtotal</b>	3,017	2,904	2,601	2,236	3,166	3,166	3,059	3,045	3,109	2,403	2,704	2,889	2,977	2,913	2,547	1,647	3,151	3,161	2,969	2,960	2,859	2,279	2,795	2,985
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	(274)	(521)	(147)	0	0	0	0	0	0	0	(276)	0	(324)	(700)	(286)	(268)	0	0	0
<b>2006 IRP Resources</b>																								
2012 Wind RFP	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8
Langley Gulch	0	0	0	0	0	0	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Geothermal	0	0	0	0	0	0	0	0	0	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
Geothermal	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	(266)	(213)	0	0	0	0	0	0	0	0	0	0	0	(373)	0	0	0	0	0
<b>2009 IRP DSM</b>																								
Commercial (FlexPeak)	0	0	0	0	0	57	57	57	0	0	0	0	0	0	0	0	0	57	57	57	0	0	0	0
Irrigation Peak Rewards	0	0	0	0	0	254	254	0	0	0	0	0	0	0	0	0	0	254	254	0	0	0	0	0
Energy Efficiency Peak Reduction	12	12	12	12	12	12	12	12	12	12	12	12	18	18	18	18	18	18	18	18	18	18	18	18
<b>Total New DSM Peak Reduction</b>	12	12	12	12	12	323	323	69	12	12	12	12	18	18	18	18	18	329	329	75	18	18	18	18
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(44)	0	0	0	0	0
<b>2009 IRP Resources</b>																								
2015 Boardman—Hemingway Transmission																								
2015 Shoshone Falls Upgrade (49 MW)																								
2017 Boardman—Hemingway Transmission																								
2020 Large Aero (100 MW)																								
2022 Wind (100 MW)																								
2024 Large Aero (2 X 100 MW)																								
2025 Gateway West Transmission																								
2026 Large Aero (2 X 100 MW)																								
2027 Wind (2 X 200 MW)																								
2028 Large Aero (4 X 100 MW)																								
2029 Large Aero (5 X 100 MW)																								
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(44)	0	0	0	0	0





Peak-Hour	2018												2019											
	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
<b>Load and Resource Balance</b>																								
<b>Load Forecast (95th%)—w/EE DSM</b>	(2,576)	(2,501)	(2,233)	(1,915)	(3,042)	(3,780)	(4,003)	(3,523)	(3,334)	(2,223)	(2,448)	(2,759)	(2,578)	(2,501)	(2,238)	(1,915)	(3,067)	(3,827)	(4,060)	(3,570)	(3,374)	(2,230)	(2,459)	(2,773)
Existing DSM (Irrigation Timer)	0	0	0	0	0	6	6	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0
Existing DSM (AC Cool Credit)	0	0	0	0	0	51	51	51	0	0	0	0	0	0	0	0	0	51	51	51	0	0	0	0
Total Existing Demand Response	0	0	0	0	0	57	57	51	0	0	0	0	0	0	0	0	0	57	57	51	0	0	0	0
<b>Peak-Hour Load Forecast w/Existing DSM</b>	(2,576)	(2,501)	(2,233)	(1,915)	(3,042)	(3,723)	(3,947)	(3,472)	(3,334)	(2,223)	(2,448)	(2,759)	(2,578)	(2,501)	(2,238)	(1,915)	(3,067)	(3,770)	(4,003)	(3,520)	(3,374)	(2,230)	(2,459)	(2,773)
<b>Existing Resources</b>																								
Coal (w/Curtailment)	980	980	586	376	525	936	977	977	671	470	908	977	977	977	486	237	405	916	977	977	671	314	775	977
Hydro (90th%)—HCC	1,113	845	585	585	1,175	1,041	1,005	945	1,080	780	510	870	1,114	845	700	585	1,173	1,039	1,005	945	1,035	760	600	1,187
Hydro (90th%)—Other	199	201	192	211	284	290	230	222	208	207	195	200	198	201	191	211	284	287	227	221	207	206	195	200
Sho-Ban Water Lease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Hydro</b>	1,312	1,046	777	796	1,460	1,331	1,235	1,167	1,288	987	705	1,070	1,313	1,046	891	796	1,457	1,326	1,232	1,166	1,242	966	795	1,387
<b>CSPP (PURPA)</b>	52	51	54	79	129	138	141	132	110	82	58	55	52	51	54	79	129	138	141	132	110	82	58	55
<b>Power Purchase Agreements</b>																								
Elkhorn Valley Wind	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Raft River Geothermal	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
PPL Montana—Jefferson (83 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Side Purchase (50 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mead Purchase	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Power Purchase Agreements</b>	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
<b>Firm Pacific NW Import Capability</b>	218	426	406	166	363	206	54	179	256	161	525	439	222	432	300	335	355	193	48	174	249	189	520	312
<b>Gas Peakers</b>	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416
<b>Subtotal</b>	2,993	2,934	2,254	1,848	2,908	3,041	2,838	2,887	2,756	2,131	2,627	2,971	2,995	2,937	2,162	1,878	2,777	3,003	2,830	2,881	2,703	1,982	2,579	3,161
<b>Monthly Surplus/Deficit</b>	0	0	0	(67)	(135)	(682)	(1,108)	(586)	(578)	(92)	0	0	0	0	(76)	(37)	(290)	(768)	(1,173)	(639)	(671)	(248)	0	0
<b>2006 IRP Resources</b>																								
2012 Wind RFP	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8
Langley Gulch	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	(335)	(761)	(238)	(231)	0	0	0	0	0	0	0	0	(420)	(826)	(291)	(324)	0	0	0
<b>2009 IRP DSM</b>																								
Commercial (FlexPeak)	0	0	0	0	0	57	57	57	0	0	0	0	0	0	0	0	0	57	57	57	0	0	0	0
Irrigation Peak Rewards	0	0	0	0	0	254	254	0	0	0	0	0	0	0	0	0	0	254	254	0	0	0	0	0
Energy Efficiency Peak Reduction	51	51	51	51	52	51	51	51	52	51	51	52	59	58	59	58	59	58	58	58	59	58	59	59
<b>Total New DSM Peak Reduction</b>	51	51	51	51	52	362	362	108	52	51	51	52	59	58	59	58	59	369	369	115	59	58	59	59
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	0	(399)	(131)	(179)	0	0	0	0	0	0	0	0	(51)	(457)	(176)	(265)	0	0	0
<b>2009 IRP Resources</b>																								
2015 Boardman—Hemingway Transmission	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
2015 Shoshone Falls Upgrade (49 MW)	2	2	0	0	3	10	0	0	0	0	0	1	2	2	0	0	3	10	0	0	0	0	0	1
2017 Boardman—Hemingway Transmission	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175
2020 Large Aero (100 MW)																								
2022 Wind (100 MW)																								
2024 Large Aero (2 X 100 MW)																								
2025 Gateway West Transmission																								
2026 Large Aero (2 X 100 MW)																								
2027 Wind (2 X 200 MW)																								
2028 Large Aero (4 X 100 MW)																								
2029 Large Aero (5 X 100 MW)																								
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(32)	0	0	0	0	0



Peak-Hour	2022												2023											
	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23
<b>Load and Resource Balance</b>																								
<b>Load Forecast (95th%)—w/EE DSM</b>	(2,543)	(2,477)	(2,232)	(1,886)	(3,131)	(3,961)	(4,210)	(3,685)	(3,500)	(2,245)	(2,474)	(2,763)	(2,535)	(2,470)	(2,230)	(1,878)	(3,153)	(4,006)	(4,261)	(3,726)	(3,540)	(2,249)	(2,479)	(2,751)
Existing DSM (Irrigation Timer)	0	0	0	0	0	6	6	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0
Existing DSM (AC Cool Credit)	0	0	0	0	0	51	51	51	0	0	0	0	0	0	0	0	0	51	51	51	0	0	0	0
Total Existing Demand Response	0	0	0	0	0	57	57	51	0	0	0	0	0	0	0	0	0	57	57	51	0	0	0	0
<b>Peak-Hour Load Forecast w/Existing DSM</b>	(2,543)	(2,477)	(2,232)	(1,886)	(3,131)	(3,904)	(4,154)	(3,634)	(3,500)	(2,245)	(2,474)	(2,763)	(2,535)	(2,470)	(2,230)	(1,878)	(3,153)	(3,949)	(4,205)	(3,675)	(3,540)	(2,249)	(2,479)	(2,751)
<b>Existing Resources</b>																								
<b>Coal (w/Curtailment)</b>	977	977	605	0	417	935	977	977	673	314	592	977	977	977	430	0	417	935	977	977	493	314	555	977
Hydro (90th%)—HCC	1,056	815	700	585	1,177	1,035	1,040	945	1,035	750	600	785	1,048	815	785	585	1,104	1,035	1,005	945	1,035	700	600	785
Hydro (90th%)—Other	197	199	189	210	282	279	217	218	204	204	193	198	196	198	188	209	281	277	214	218	203	204	192	197
Sho-Ban Water Lease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Hydro</b>	1,252	1,014	889	795	1,458	1,314	1,257	1,163	1,239	954	793	983	1,244	1,013	973	794	1,385	1,312	1,219	1,163	1,238	904	792	982
<b>CSPP (PURPA)</b>	52	51	54	79	129	138	141	132	110	82	58	55	52	51	54	79	129	138	141	132	110	82	58	55
<b>Power Purchase Agreements</b>																								
Elkhorn Valley Wind	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Raft River Geothermal	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
PPL Montana—Jefferson (83 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Side Purchase (50 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mead Purchase	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Power Purchase Agreements</b>	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
<b>Firm Pacific NW Import Capability</b>	248	445	296	311	345	185	28	142	222	216	522	439	248	433	210	303	341	176	23	142	217	270	521	439
<b>Gas Peakers</b>	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416
<b>Subtotal</b>	2,960	2,917	2,275	1,615	2,781	3,003	2,835	2,845	2,675	1,997	2,395	2,885	2,952	2,905	2,098	1,607	2,702	2,992	2,791	2,845	2,489	2,001	2,357	2,883
<b>Monthly Surplus/Deficit</b>	0	0	0	(272)	(350)	(901)	(1,319)	(789)	(825)	(248)	(79)	0	0	0	(133)	(272)	(450)	(957)	(1,413)	(830)	(1,051)	(248)	(122)	0
<b>2006 IRP Resources</b>																								
2012 Wind RFP	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8
Langley Gulch	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	(2)	(554)	(972)	(441)	(477)	0	0	0	0	0	0	0	(103)	(610)	(1,066)	(483)	(704)	0	0	0
<b>2009 IRP DSM</b>																								
Commercial (FlexPeak)	0	0	0	0	0	57	57	57	0	0	0	0	0	0	0	0	0	57	57	57	0	0	0	0
Irrigation Peak Rewards	0	0	0	0	0	254	254	0	0	0	0	0	0	0	0	0	0	254	254	0	0	0	0	0
Energy Efficiency Peak Reduction	81	80	80	80	81	80	80	80	80	80	80	80	88	87	87	88	88	88	87	88	88	88	88	88
<b>Total New DSM Peak Reduction</b>	81	80	80	80	81	391	390	137	80	80	80	80	88	87	87	88	88	398	398	144	88	88	88	88
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	0	(163)	(581)	(305)	(397)	0	0	0	0	0	0	0	(15)	(212)	(668)	(339)	(616)	0	0	0
<b>2009 IRP Resources</b>																								
2015 Boardman—Hemingway Transmission	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
2015 Shoshone Falls Upgrade (49 MW)	2	2	0	0	3	10	0	0	0	0	1	2	2	2	0	0	3	10	0	0	0	0	0	1
2017 Boardman—Hemingway Transmission	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175
2020 Large Aero (100 MW)	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
2022 Wind (100 MW)	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
2024 Large Aero (2 X 100 MW)																								
2025 Gateway West Transmission																								
2026 Large Aero (2 X 100 MW)																								
2027 Wind (2 X 200 MW)																								
2028 Large Aero (4 X 100 MW)																								
2029 Large Aero (5 X 100 MW)																								
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	(51)	0	0	0	0	0	0	0	0	0	0	(138)	0	(86)	0	0	0	0



Peak-Hour	2026												2027											
	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Jan-27	Feb-27	Mar-27	Apr-27	May-27	Jun-27	Jul-27	Aug-27	Sep-27	Oct-27	Nov-27	Dec-27
<b>Load and Resource Balance</b>																								
<b>Load Forecast (95th%)—w/EE DSM</b>	(2,460)	(2,421)	(2,199)	(1,828)	(3,206)	(4,129)	(4,393)	(3,818)	(3,664)	(2,254)	(2,475)	(2,702)	(2,393)	(2,382)	(2,168)	(1,783)	(3,216)	(4,163)	(4,424)	(3,825)	(3,703)	(2,247)	(2,460)	(2,639)
Existing DSM (Irrigation Timer)	0	0	0	0	0	6	6	0	0	0	0	0	0	0	0	0	0	6	6	0	0	0	0	0
Existing DSM (AC Cool Credit)	0	0	0	0	0	51	51	51	0	0	0	0	0	0	0	0	0	51	51	51	0	0	0	0
Total Existing Demand Response	0	0	0	0	0	57	57	51	0	0	0	0	0	0	0	0	0	57	57	51	0	0	0	0
<b>Peak-Hour Load Forecast w/Existing DSM</b>	(2,460)	(2,421)	(2,199)	(1,828)	(3,206)	(4,072)	(4,336)	(3,768)	(3,664)	(2,254)	(2,475)	(2,702)	(2,393)	(2,382)	(2,168)	(1,783)	(3,216)	(4,106)	(4,367)	(3,774)	(3,703)	(2,247)	(2,460)	(2,639)
<b>Existing Resources</b>																								
<b>Coal (w/Curtailment)</b>	977	421	0	0	0	500	977	977	313	0	313	977	311	0	0	0	0	500	977	977	34	0	0	846
Hydro (90th%)—HCC	895	775	700	585	1,173	1,035	1,005	904	1,035	628	605	785	965	690	755	585	1,123	1,035	1,005	945	1,035	632	600	785
Hydro (90th%)—Other	194	196	186	208	280	261	208	214	201	202	190	195	193	196	186	208	280	241	208	213	200	202	189	195
Sho-Ban Water Lease	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Hydro</b>	1,089	971	886	793	1,452	1,296	1,213	1,119	1,236	830	795	980	1,158	886	941	793	1,402	1,276	1,213	1,158	1,235	834	789	980
<b>CSPP (PURPA)</b>	52	51	54	79	129	138	141	132	110	82	58	55	52	51	54	79	129	138	141	132	110	82	58	55
<b>Power Purchase Agreements</b>																								
Elkhorn Valley Wind	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Raft River Geothermal	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
PPL Montana—Jefferson (83 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
East Side Purchase (50 MW)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Mead Purchase	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>Total Power Purchase Agreements</b>	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15	15
<b>Firm Pacific NW Import Capability</b>	329	412	389	131	329	172	6	125	187	364	522	444	193	504	180	210	327	165	2	126	183	343	523	449
<b>Gas Peakers</b>	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416	416
<b>Subtotal</b>	2,878	2,286	1,760	1,434	2,341	2,536	2,769	2,784	2,277	1,708	2,119	2,887	2,145	1,871	1,606	1,513	2,289	2,509	2,765	2,825	1,994	1,690	1,801	2,760
<b>Monthly Surplus/Deficit</b>	0	(135)	(439)	(394)	(864)	(1,536)	(1,567)	(984)	(1,387)	(546)	(356)	0	(248)	(511)	(562)	(270)	(927)	(1,598)	(1,603)	(950)	(1,709)	(557)	(659)	0
<b>2006 IRP Resources</b>																								
2012 Wind RFP	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8
Langley Gulch	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
Geothermal	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20	20
<b>Remaining Monthly Surplus/Deficit</b>	0	0	(92)	(47)	(517)	(1,188)	(1,220)	(636)	(1,040)	(199)	(9)	0	0	(163)	(215)	0	(579)	(1,250)	(1,255)	(602)	(1,361)	(209)	(311)	0
<b>2009 IRP DSM</b>																								
Commercial (FlexPeak)	0	0	0	0	0	57	57	57	0	0	0	0	0	0	0	0	0	57	57	57	0	0	0	0
Irrigation Peak Rewards	0	0	0	0	0	254	254	0	0	0	0	0	0	0	0	0	0	254	254	0	0	0	0	0
Energy Efficiency Peak Reduction	111	111	111	111	112	111	111	111	111	110	112	111	119	119	118	118	120	119	119	119	119	119	119	119
<b>Total New DSM Peak Reduction</b>	111	111	111	111	112	421	421	167	111	110	112	111	119	119	118	118	120	429	429	175	119	119	119	119
<b>Remaining Monthly Surplus/Deficit</b>	0	0	0	0	(405)	(767)	(798)	(469)	(929)	(88)	0	0	0	(44)	(96)	0	(459)	(821)	(826)	(427)	(1,242)	(90)	(192)	0
<b>2009 IRP Resources</b>																								
2015 Boardman—Hemingway Transmission	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250	250
2015 Shoshone Falls Upgrade (49 MW)	2	2	0	0	3	10	0	0	0	0	1	2	2	2	0	0	3	10	0	0	0	0	0	1
2017 Boardman—Hemingway Transmission	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175	175
2020 Large Aero (100 MW)	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
2022 Wind (100 MW)	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
2024 Large Aero (2 X 100 MW)	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
2025 Gateway West Transmission	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
2026 Large Aero (2 X 100 MW)	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200
2027 Wind (2 X 200 MW)													20	20	20	20	20	20	20	20	20	20	20	20
2028 Large Aero (4 X 100 MW)																								
2029 Large Aero (5 X 100 MW)																								
<b>Monthly Surplus/Deficit</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(192)	0	0	0

