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3 **BEFORE THE PUBLIC UTILITY COMMISSION**
4 **OF OREGON**
5 **UM 1056**

6 IN THE MATTER OF

7 An Investigation into Integrated Least Cost
8 Planning Requirements

IDAHO POWER'S OPENING COMMENTS

9 Idaho Power Company ("Idaho Power" or the "Company") submits these Opening
10 Comments in accordance with the Consolidated Ruling issued on July 11, 2005, by
11 Administrative Law Judge Logan in the above-referenced docket.

12 As noted by the Company in its Initial Position Statement in this matter, dated April 6,
13 2005, Idaho Power is a multi-jurisdictional public utility that is regulated in the states of Oregon
14 and Idaho. The Company's service territory in Oregon encompasses portions of Malheur,
15 Harney, and Baker counties. Idaho Power's retail customers comprise only 2% of the electric
16 load regulated by the Public Utility Commission of Oregon ("OPUC"). About 5% of Idaho
17 Power's retail customers are located in Oregon. The remaining 95% of the customers who
18 obtain service from Idaho Power reside in Idaho. In Idaho, the Idaho Public Utilities
19 Commission ("IPUC") regulates Idaho Power.

20 Current guidelines for integrated resource planning have been essentially the same in
21 Idaho and Oregon since the IPUC and OPUC have required regulated utilities to file Integrated
22 Resource Plans ("IRP"). In its Initial Position Statement, Idaho Power expressed its concern that
23 this proceeding not create rigid requirements that may not be compatible with the procedures
24 currently followed in Idaho. Idaho Power has participated in each of the workshops held in this
25 matter. The Company's primary focus has been to monitor the proceedings to encourage
26 continued compatibility in IRP filing requirements between the two states.

1 Consistent with the OPUC Staff's Initial Responses to the issues raised in this docket,
2 Idaho Power files an IRP with a ten-year planning horizon with both the Oregon and Idaho
3 commissions every two years and closely aligns its competitive bidding process for energy
4 resources with its commission-acknowledged IRP. In the 2004 IRP process, the Company
5 evaluated a number of resource portfolios and selected a diversified portfolio consisting of
6 demand-side resources, renewable and distributed generation, and traditional thermal generation
7 as the preferred portfolio.

8 The Company strongly supports conducting integrated resource planning on a system-
9 wide basis and considers, among other things, loads, resources, generation and transmission in
10 that analysis. Because geographical issues such as load and resource locations, generation sites,
11 and transmission paths transcend jurisdictional boundaries, Idaho Power supports the Staff's
12 position to continue integrated resource planning on an integrated system basis.

13 Given Idaho Power's limited presence in Oregon and the success with which IRPs have
14 been developed on an integrated basis for the Idaho Power system under the present guidelines
15 set forth by the Oregon and Idaho Commissions, Idaho Power respectfully requests and
16 encourages the continued compatibility in IRP filing requirements between the two states.

17 Respectfully submitted this 9th day of September 2005.

18 ATER WYNNE, LLP

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September 9, 2005

VIA EMAIL AND US MAIL

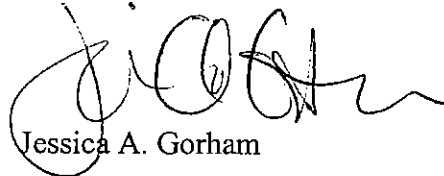
Filing Center
Oregon Public Utility Commission
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Salem, OR 97308-2148

Re: UM 1056 – Idaho Power's Opening Comments

Dear Sir or Madam:

Enclosed for filing in the above-named docket is the original Idaho Power Company's Opening Comments. Please contact me with any questions.

Very truly yours,



Jessica A. Gorham

Enclosure

cc: UM 1056 Service List

**CERTIFICATE OF SERVICE
UM 1056**

I hereby certify that a true and correct copy of **IDAHO POWER'S OPENING COMMENTS** was served via U.S. Mail on the following parties on September 09, 2005:

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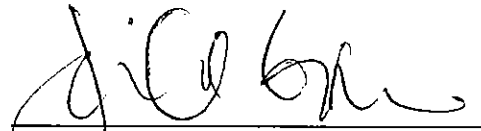
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