



IDAHO POWER COMPANY
P.O. BOX 70
BOISE, IDAHO 83707

MONICA B. MOEN
Attorney

April 5, 2005

Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol Street NE, Suite 215
P.O. Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1182
Idaho Power Company's Initial Position Statement

Dear Sir or Madam:

Enclosed for filing with the Commission is the original of Idaho Power Company's Initial Position Statement regarding the above-described case. An electronic copy of this filing will be sent to the OPUC today.

I would appreciate it if you would return a stamped copy of this transmittal letter for our files.

Very truly yours,

Monica B. Moen

MBM:jb
Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1182**

In the Matter of)	
)	
NORTHWEST INDEPENDENT POWER PRODUCERS COALITION)	IDAHO POWER COMPANY'S INITIAL POSITION STATEMENT
)	
Petition for an Investigation Regarding Competitive Bidding.)	
_____)	

COMES NOW Idaho Power Company (“Idaho Power” or the “Company”) and, in accordance with the conference report issued on February 3, 2006 by Administrative Law Judge Logan in the above-referenced docket, hereby submits its initial position statement.

Idaho Power Company is a multi-jurisdictional public utility that is regulated in the States of Oregon and Idaho. The Company’s service territory in the State of Oregon encompasses portions of Malheur, Harney and Baker Counties. About 5% of the Company’s customers are located in the State of Oregon. The remaining 95% of the customers who obtain service from Idaho Power reside in Idaho. In Idaho, the Idaho Public Utilities Commission regulates Idaho Power.

Current OPUC guidelines for competitive bidding allow the Company the flexibility to comply with the Idaho procedures for competitive bidding. Idaho Power's is concerned that these proceedings not create rigid requirements that may not be compatible with the procedures followed in Idaho. As a result, Idaho Power has not presented a detailed issues list. Idaho Power's primary focus will be to monitor these proceedings with the goal to encourage the OPUC, to the extent possible, to recognize the limited presence that Idaho Power has in Oregon and permit the Company certain flexibility and latitude in the application of the guidelines established in this case.

Respectfully submitted this 5th day of April 2005.



Monica B. Moen and
Lisa F. Rackner
Attorneys for Idaho Power Company
Idaho Power Company
P.O. Box 70
Boise, ID 83707-0070
Telephone: (208) 388-2692
FAX: (208) 388-6936
E-mail: mmoen@idahopower.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of April 2005, I served a true and correct copy of IDAHO POWER COMPANY'S INITIAL POSITION STATEMENT in Docket No. UM 1182 upon the following named parties by first-class mail, postage prepaid, and by e-mail and addressed to the following:

Northwest Natural
220 NW 2nd Avenue
Portland, OR 97209

NW Energy Coalition
219 First Street, Suite 100
Seattle, WA 98104

Portland General Electric
Rates & Regulatory Affairs
121 SW Salmon Street, 1WTC0702
Portland, OR 97204

Susan K. Ackerman
NIPPC
P.O. Box 10207
Portland, OR 97296-0207

Stephanie S. Andrus
Department of Justice
Regulated Utility & Business Section
1162 Court Street NE
Salem, OR 97301-4096

Katherine Barnard
Cascade Natural Gas
P.O. Box 24464
Seattle, WA 98124

Laura Beane
PacifiCorp
825 Multnomah, Suite 800
Portland, OR 97232-2153

Phil Carver
Oregon Department of Energy
625 Marion Street NE, Suite 1
Salem, OR 97301-3742

Jason Eisdorfer
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 308
Portland, OR 97205

Ann L. Fisher
AF Legal & Consulting Services
1425 SW 20th, Suite 202
Portland, OR 97201

Ann English Gravatt
Renewable Northwest Project
917 SW Oak, Suite 303
Portland, OR 97205

David E. Hamilton
Norris & Stevens
621 SW Morrison Street, Suite 800
Portland, OR 97205-3825

Robert D. Kahn
NIPPC
7900 SE 28th Street, Suite 200
Mercer Island, WA 98040

Lisa F. Rackner
Ater Wynne LLP
222 SW Columbia Street, Suite 1800
Portland, OR 97201-6618

Katherine A. McDowell
Stoel Rives LLP
900 SW Fifth Avenue, Suite 1600
Portland, OR 97204-1268

Alex Miller
Northwest Natural Gas Company
220 NW Second Avenue
Portland, OR 97209-3991

John W. Stephens
Esler Stephens & Buckley
888 SW Fifth Avenue, Suite 700
Portland, OR 97204-2021

Janet L. Prewitt
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096

Jon T. Stoltz
Cascade Natural Gas
P.O. Box 24464
Seattle, WA 98124

Steven Weiss
Northwest Energy Coalition
4422 Oregon Trail Ct. NE
Salem, OR 97305

V. Denise Saunders
Portland General Electric
121 SW Salmon Street, 1WTC1301
Portland, OR 97204



MONICA B. MOEN
Attorney for Idaho Power Company