

JOHN R. KROGER  
Attorney General



MARY H. WILLIAMS  
Deputy Attorney General

**DEPARTMENT OF JUSTICE**  
GENERAL COUNSEL DIVISION

June 14, 2012

Attention: Filing Center  
Public Utility Commission of Oregon  
550 Capitol Street NE, #215  
PO Box 2148  
Salem, OR 97308-2148  
[puc.filingcenter@state.or.us](mailto:puc.filingcenter@state.or.us)

Re: *In the Matter of IDAHO POWER COMPANY Request for General Rate Revision*  
PUC Docket No.: UE 233  
DOJ File No.: 860115-GB0563-11

Enclosed for filing are an original and one copy of Staff Motion to Due Date for Testimony in the above-captioned docket for filing with the PUC today.

Sincerely,

Stephanie S. Andrus  
Senior Assistant Attorney General  
Business Activities Section

SSA:mne/#3454977  
c: UE 233 Service List

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

3                                   **UE 233**

4 In the Matter of  
5 IDAHO POWER COMPANY  
6 Request for a General Rate Increase.  
7

MOTION TO EXTEND DUE DATE FOR  
TESTIMONY  
(Expedited Consideration Requested.)

8           Pursuant to OAR 860-001-0090(1)(h) and OAR 860-001-0420, Staff of the Public Utility  
9 Commission of Oregon (“Staff”) asks the administrative law judge to allow a two-day extension  
10 (from June 18, 2012 to June 20, 2012) for Staff and intervenors to file testimony in the above-  
11 captioned docket. Staff also asks that the administrative law judge grant a one-day extension of  
12 time (from July 17, 2012 to July 18, 2012) for Idaho Power’s next round of testimony.

13           Staff has contacted the Citizens’ Utility Board, Idaho Power Company, the Oregon  
14 Industrial Customers of Idaho Power, and Renewable Northwest Project regarding this request  
15 and these parties do not oppose the motion. Counsel for Staff attempted to contact Northwest  
16 Energy Coalition but was not successful.<sup>1</sup> The Oregon Irrigators Pumpers Association is no  
17 longer active in this docket and Staff did not attempt to contact them regarding this motion.

18           Staff asks for the extension of time because it needs additional time to complete and  
19 finalize its testimony. At issue in this docket is whether Idaho Power prudently invested in  
20 upgrades to Unit 3 of the Bridger coal plant that it owns with PacifiCorp. The same issue is  
21 presented in PacifiCorp’s general rate case. Due to the complexity and the overlapping nature of  
22 these issues, the development and writing of testimony requires a significant amount of Staff  
23 resources. Staff currently has a very large caseload, which includes general rate cases by  
24 PacifiCorp and Northwest Natural Gas Company. Accordingly, Staff needs additional time in  
25

26 <sup>1</sup> Staff did not contact PacifiCorp about whether they oppose this motion to extend to testimony  
in UE 233. Staff did contact counsel for PacifiCorp regarding the motion for extension in UE  
246, and PacifiCorp does not object to that motion.

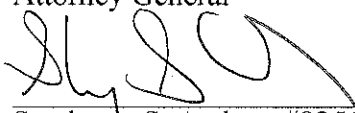
1 which to complete the testimony in this case, as well as the testimony regarding investment in  
2 coal plant upgrades presented in PacifiCorp's general rate case.<sup>2</sup>

3 Staff requests expedited consideration of this motion under OAR 860-001-420(7). Staff  
4 also requests that the administrative law judge shorten the time for response.

5 DATED this 14<sup>th</sup> day of June 2012.

6 Respectfully submitted,

7 JOHN R. KROGER  
8 Attorney General

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10 \_\_\_\_\_  
11 Stephanie S. Andrus, #92512  
12 Senior Assistant Attorney General  
13 Of Attorneys for Staff of the Public Utility  
14 Commission of Oregon  
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26 <sup>2</sup> Staff is also filing a motion to extend by two days the due date for its testimony regarding coal  
plant upgrades in PacifiCorp's general rate. (Docket No. UE 246).

CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of June, 2012, I served the foregoing Staff Motion to Extend Due Date for Testimony upon the persons named on the service list below who have waived such service by mail, by serving a full, true and correct copy thereof at their e-mail address, as follows:

W Gregory M. Adams ( <b>Confidential</b> ) <b>(Highly Confidential)</b> Richardson & O'Leary <a href="mailto:greg@richardsonandoleary.com">greg@richardsonandoleary.com</a>	W Christa Bearry ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) Idaho Power Company <a href="mailto:cbearry@idahopower.com">cbearry@idahopower.com</a>	W Erick Colville ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) OPUC <a href="mailto:erik.colville@state.or.us">erik.colville@state.or.us</a>
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W Robert Jenks ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) CUB <a href="mailto:bob@oregoncub.org">bob@oregoncub.org</a>	W Joshua D. Johnson ( <b>Confidential</b> ) <b>(Highly Confidential)</b> Attorney at Law <a href="mailto:jdj@racinelaw.net">jdj@racinelaw.net</a>	W Judy Johnson ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) OPUC <a href="mailto:judy.johnson@state.or.us">judy.johnson@state.or.us</a>
W G. Catriona McCracken ( <b>Confidential</b> ) <b>(Highly Confidential)</b> CUB <a href="mailto:catriona@oregoncub.org">catriona@oregoncub.org</a>	W Lisa D. Nordstrom ( <b>Confidential</b> ) <b>(Highly Confidential)</b> Idaho Power Company <a href="mailto:lnordstrom@idahopower.com">lnordstrom@idahopower.com</a>	W Eric L. Olsen ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) Attorney at Law <a href="mailto:elo@racinelaw.net">elo@racinelaw.net</a>
W Oregon Dockets PacifiCorp, dba Pacific Power <a href="mailto:oregondockets@pacificcorp.com">oregondockets@pacificcorp.com</a>	W Lisa F. Rackner ( <b>Confidential</b> ) <b>(Highly Confidential)</b> McDowell Rackner & Gibson PC <a href="mailto:lisa@mcd-law.com">lisa@mcd-law.com</a>	W Don Reading ( <b>Confidential</b> ) ( <b>Highly Confidential</b> ) <a href="mailto:dreading@mindspring.com">dreading@mindspring.com</a>
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W Anthony J. Yankel ( <b>Confidential</b> ) <b>(Highly Confidential)</b> Utility Net.Inc tony@yankel.net		
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DATED: June 14, 2012



Stephanie Andrus, OSB #925123  
Senior Assistant Attorney General  
Of Attorneys for Staff of the Public Utility  
Commission of Oregon