

JOHN R. KROGER
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

February 16, 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

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 Admit Exhibits into Record in the above-captioned docket for filing with the PUC today.

Sincerely,

Stephanie S. Andrus
Senior Assistant Attorney General
Business Activities Section

SSA:mme/#3235072
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 Application for General Rate Revision
7

STAFF MOTION TO ADMIT EXHIBITS INTO
THE RECORD

8 Staff of the Public Utility Commission of Oregon asks the Administrative Law Judge
9 (ALJ) to admit into the record the following pre-filed staff exhibits:

10 Staff Exhibit 100	Carla Bird Opening Testimony
11 Staff Exhibit 101	Carla Bird Witness Qualification Statement
12 Staff Exhibit 102	Exhibits in support of Testimony (Carla Bird)
13 Staff Exhibit 200	Linnea Wittikind Opening Testimony
14 Staff Exhibit 201	Linnea Wittikind Witness Qualification Statement
15 Staff Exhibit 202	Exhibits in Support of Testimony (Linnea Wittikind)
16 Staff Exhibit 203	Exhibits in Support of Testimony (Linnea Wittikind)
17 Staff Exhibit 300	Brian Bahr Opening Testimony
18 Staff Exhibit 301	Brian Bahr Witness Qualification Statement
19 Staff Exhibit 302	Confidential Exhibit in Support of Testimony (Brian Bahr)
20 Staff Exhibit 303	Exhibits in Support of Testimony (Brian Bahr)
21 Staff Exhibit 400	Nick Cimmiyotti Opening Testimony
22 Staff Exhibit 401	Nick Cimmiyotti Witness Qualification Statement
23 Staff Exhibit 402	Confidential Exhibit in Support of Testimony (Nick Cimmiyotti)
24 Staff Exhibit 403	Exhibits in Support of Testimony (Nick Cimmiyotti)
25 Staff Exhibit 500	Ming Peng Opening Testimony
26 Staff Exhibit 501	Ming Peng Witness Qualification Statement

1	Staff Exhibit 502	Exhibits in Support of Testimony
2	Staff Exhibit 600	Irina Phillips Opening Testimony
3	Staff Exhibit 601	Irina Phillips Witness Qualification Statement
4	Staff Exhibit 602	Exhibit in Support of Testimony (Irina Phillips)
5	Staff Exhibit 603	Exhibit in Support of Testimony (Irina Phillips)
6	Staff Exhibit 604	Exhibit in Support of Testimony (Irina Phillips)
7	Staff Exhibit 700	Jorge Ordonez Opening Testimony
8	Staff Exhibit 701	Jorge Ordonez Witness Qualification Statement
9	Staff Exhibit 702	Exhibit in Support of Testimony (Jorge Ordonez)
10	Staff Exhibit 703	Exhibit in Support of Testimony (Jorge Ordonez)
11	Staff Exhibit 704	Exhibit in Support of Testimony (Jorge Ordonez)
12	Staff Exhibit 705	Exhibit in Support of Testimony (Jorge Ordonez)
13	Staff Exhibit 800	Steve Storm Opening Testimony
14	Staff Exhibit 801	Steve Storm Witness Qualification Statement
15	Staff Exhibit 802	Exhibits in Support of Testimony (Steve Storm)
16	Staff Exhibit 900	George Compton Opening Testimony
17	Staff Exhibit 901	George Compton Witness Qualification Statement
18	Staff Exhibit 902	Recommended Revenue Spread
19	Staff Exhibit 903	Alternative Seasonal Residential Rate Designs
20	Staff Exhibit 904	Monthly Residential Billing Comparisons
21	Staff Exhibit 905	Idaho Power's Response to SDR Regarding UM 1415 Straw Criteria as Applied to Seasonal Rates
22	Staff Exhibit 906	Cascade Natural Gas Customers in the Baker City and Ontario Areas


24 The pre-filed testimony of the Staff witnesses is supported by affidavits of the witnesses,
25 which are attached to this motion. Judy Johnson, Program Manager of the Revenue
26 Requirements Section of the Electric and Natural Gas Division, has adopted the testimony of

1 Staff witness Linnea Wittikind, who is temporarily on leave. Ms. Johnson's witness
2 qualification statement is attached to her affidavit adopting Ms. Wittikind's testimony and
3 attesting to its truthfulness.

4 DATED this 16th day of February 2012.

5 Respectfully submitted,

6 JOHN R. KROGER
7 Attorney General

8 
9 _____
10 Stephanie S. Andrus, #925123
11 Senior Assistant Attorney General
12 Of Attorneys for the Staff of the Public Utility
13 Commission of Oregon
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1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**
4

5 In the Matter of
6 IDAHO POWER COMPANY
7 Request for a General Rate Revision.
8

AFFIDAVIT OF JUDY JOHNSON

9 State of Oregon)
10 County of Marion) ss.
11

12 I, JUDY JOHNSON, hereby depose and say:

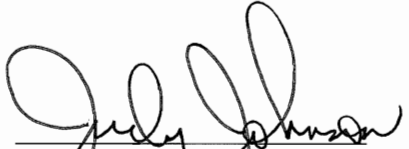
- 13 1. I am employed as the Program Manager for the Revenue Requirements Section of the
14 Electric and Natural Gas Division of the Public Utility Commission of Oregon. My
15 witness qualification statement is attached to this affidavit.
- 16 2. In the course of my employment, I reviewed direct testimony drafted by Linnea
17 Wittikind, a Senior Financial Analyst in the Corporate Analysis and Water Regulation
18 Section of the Economic Research and Financial Analysis Division. Ms. Wittikind's
19 testimony was pre-filed as Staff Exhibit 200. Her witness qualification statement was
20 pre-filed as Staff Exhibit 201, and exhibits she created in support of her testimony pre-
21 filed as Staff Exhibits 202-203.
- 22 3. Ms. Wittikind is temporarily on leave.
- 23 4. I adopt Ms. Wittikind's testimony in support of Staff's initial position in this case and
24 attest that to the best of my knowledge, the testimony in pre-filed Staff Exhibit 200 and

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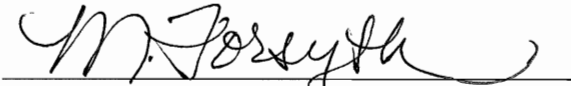
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the statements in the witness qualification statement attached to this affidavit are true and accurate.


JUDY JOHNSON

SUBSCRIBED AND SWORN to before me this 15 day of February, 2012.


Notary Public for Oregon
My Commission Expires: 7-20-15



WITNESS QUALIFICATION STATEMENT

NAME: JUDY A. JOHNSON
EMPLOYER: PUBLIC UTILITY COMMISSION OF OREGON
TITLE: PROGRAM MANAGER – RATES AND TARIFFS
ADDRESS: 550 CAPITOL ST. N.E., SALEM, OREGON 97310-1380
EDUCATION: MBA with an emphasis in Statistics from
Eastern Washington University
Cheney, Washington
BA in Accounting from
Eastern Washington University
Cheney, Washington
EXPERIENCE:

3/95-Present I have been employed by the Oregon Public Utility Commission since March of 1995. My current position is Program Manager of Rates & Tariffs. I was previously a Senior Analyst for the Revenue Requirements Section.

6/77-2/95 I was employed by Avista Corporation, an electric and natural gas utility located in Spokane, Washington. The majority of my employment was spent in the Rates and Regulatory Affairs Department as a Senior Rate Analyst. I have prepared testimony and exhibits in numerous electric and natural gas rate cases, primarily in the area of results of operations and cost of service.

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**

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

AFFIDAVIT OF NICK CIMMIYOTTI

8 State of Oregon)
9 County of Marion) ss.

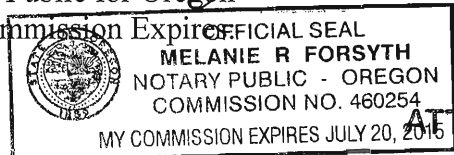
10 I, NICK CIMMIYOTTI, hereby depose and say:

- 11 1. I am employed as a Senior Financial Analyst in the Corporate Analysis and Water
12 Regulation Section of the Electric and Natural Gas Division of the Public Utility
13 Commission of Oregon.
- 14 2. In the course of my employment, I drafted direct testimony in support of Staff's initial
15 position in this case, pre-filed as Staff Exhibit 300. I also pre-filed a witness
16 qualification, labeled Staff Exhibit 301, and two exhibits in support of my testimony,
17 labeled Staff Exhibits 302-303.
- 18 3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 300 and
19 the statements in my witness qualification statement pre-filed as Staff Exhibit 301 are
20 true and accurate.

21 *Nick Cimmiyotti*
22 NICK CIMMIYOTTI

23 SUBSCRIBED AND SWORN to before me this 15 day of February, 2012.

24
25 *M. Joseph*
26 _____
Notary Public for Oregon
My Commission Expires _____



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**

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

AFFIDAVIT OF STEVEN T. STORM

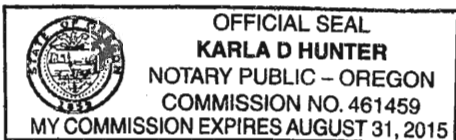
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9 State of Oregon)
) ss.
10 County of Marion)


I, STEVEN T. STORM, hereby depose and say:

- 11 1. I am employed as the Program Manager of the Economic and Policy Analysis Section of
12 the Economic Research and Financial Analysis Division of the Public Utility
13 Commission of Oregon.
- 14 2. In the course of my employment, I drafted direct testimony in support of Staff's initial
15 position in this case, pre-filed as Staff Exhibit 800. I also pre-filed a witness qualification
16 statement, labeled Staff Exhibit 801, and two exhibits in support of my testimony labeled
17 Staff Exhibit 802 and Staff Exhibit 803.
- 18 3. On December 29, 2011, I filed an errata to my pre-filed testimony
- 19 4. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 800, as
20 corrected by the December 29, 2011 errata, and the statements in my witness
21 qualification statement in pre-filed Staff Exhibit 801 are true and accurate.

22
23 
STEVEN T. STORM

24 SUBSCRIBED AND SWORN to before me this 15th day of February, 2012.



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26 
Notary Public for Oregon
My Commission Expires: August 31, 2015

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**

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

AFFIDAVIT OF GEORGE COMPTON

8
9 State of Oregon)
10 County of Marion) ss.

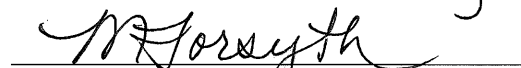
I, GEORGE COMPTON, hereby depose and say:

- 11
12 1. I am employed as a Senior Economist in the Economic and Policy Analysis Section of
13 the Economic Research and Financial Analysis Division of the Public Utility
14 Commission of Oregon.
15 2. In the course of my employment, I drafted direct testimony in support of Staff's initial
16 position in this case, pre-filed as Staff Exhibit 900. I also pre-filed a witness qualification
17 statement, labeled Staff Exhibit 901, and exhibits in support of my testimony labeled
18 Staff Exhibits 902-906.
19 3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 900 and
20 the statements in my witness qualification statement in pre-filed Staff Exhibit 901 are
21 true and accurate.

22 
23 GEORGE COMPTON

24 SUBSCRIBED AND SWORN to before me this 15 day of February, 2012.



27 
28 Notary Public for Oregon
29 My Commission Expires: 7-20-15

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 233**

In the Matter of
IDAHO POWER COMPANY
Request for a General Rate Revision.

AFFIDAVIT OF JORGE ORDONEZ

State of Oregon)
) ss.
County of Marion)

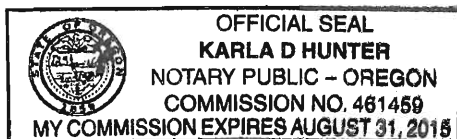
I, JORGE ORDONEZ, hereby depose and say:

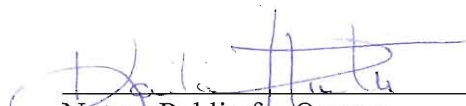
1. I am employed as a Senior Financial Economist in the Economic and Policy Analysis Section of the Economic Research and Financial Analysis Division of the Public Utility Commission of Oregon.
2. In the course of my employment, I drafted direct testimony in support of Staff's initial position in this case, pre-filed as Staff Exhibit 700. I also pre-filed a witness qualification statement, labeled Staff Exhibit 701, and exhibits in support of my testimony labeled Staff Exhibits 702-704.
3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 700 and the statements in my witness qualification statement in pre-filed Staff Exhibit 701 are true and accurate.



JORGE ORDONEZ

SUBSCRIBED AND SWORN to before me this 15th day of February, 2012.





Notary Public for Oregon
My Commission Expires: August 31, 2015



Oregon

John A. Kitzhaber, MD, Governor

Public Utility Commission

550 Capitol St NE, Suite 215
Mailing Address: PO Box 2148
Salem, OR 97308-2148
Consumer Services
1-800-522-2404
Local: 503-378-6600
Administrative Services
503-373-7394

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 233

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In the Matter of
IDAHO POWER COMPANY
Request for a General Rate Revision.

AFFIDAVIT OF BRIAN BAHR

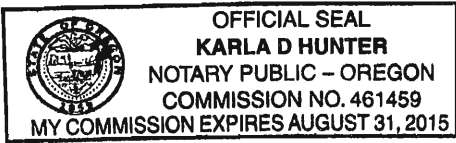
State of Oregon)
County of Marion) ss.

I, BRIAN BAHR, hereby depose and say:

- I am employed as Financial Analyst in the Corporate Analysis and Water Regulation Section of the Electric and Natural Gas Division of the Public Utility Commission of Oregon.
- In the course of my employment, I drafted direct testimony in support of Staff's initial position in this case, pre-filed as Staff Exhibit 300. I also pre-filed a witness qualification, labeled Staff Exhibit 301, and two exhibits in support of my testimony, labeled Staff Exhibits 302-303.
- I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 300 and the statements in my witness qualification in pre-filed Staff Exhibit 301 are true and accurate.

BRIAN BAHR

SUBSCRIBED AND SWORN to before me this 14th day of February, 2012.



Notary Public for Oregon
My Commission Expires: August 31, 2015



1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**
4

5 In the Matter of
6 IDAHO POWER COMPANY
7 Request for a General Rate Revision.
8 State of Oregon)
9 County of Marion) ss.

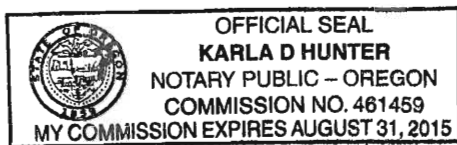
AFFIDAVIT OF MING PENG

10 I, MING PENG, hereby depose and say:

- 11 1. I am employed as a Senior Economist in the Economic and Policy Analysis Section of
12 the Economic Research and Financial Analysis Division of the Public Utility
13 Commission of Oregon.
14 2. In the course of my employment, I drafted direct testimony in support of Staff's initial
15 position in this case, pre-filed as Staff Exhibit 500. I also pre-filed a witness qualification
16 statement, labeled Staff Exhibit 501, and an exhibit in support of my testimony labeled
17 Staff Exhibit 502.
18 3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 500 and
19 the statements in my witness qualification statement in pre-filed Staff Exhibit 501 are
20 true and accurate.

21 
22 MING PENG

23 SUBSCRIBED AND SWORN to before me this 14th day of February, 2012.



25 
26 Notary Public for Oregon

My Commission Expires: August 31, 2015

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 233

In the Matter of
 IDAHO POWER COMPANY
 Request for a General Rate Revision.

AFFIDAVIT OF IRINA PHILLIPS

State of Oregon)
) ss.
 County of Marion)

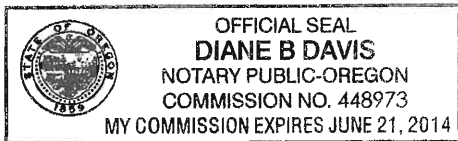
I, IRINA PHILLIPS, hereby depose and say:

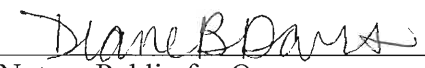
1. I am employed as a Utility Economist in the Economic and Policy Analysis Section of the Economic Research and Financial Analysis Division of the Public Utility Commission of Oregon.
2. In the course of my employment, I drafted direct testimony in support of Staff's initial position in this case, pre-filed as Staff Exhibit 600. I also pre-filed a witness qualification statement, labeled Staff Exhibit 601, and exhibits in support of my testimony labeled Staff Exhibits 602-604.
3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 600 and the statements in my witness qualification statement in pre-filed Staff Exhibit 601 are true and accurate.



 IRINA PHILLIPS

SUBSCRIBED AND SWORN to before me this 14th day of February, 2012.





 Notary Public for Oregon
 My Commission Expires: June 21, 2014

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UE 233**

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In the Matter of
IDAHO POWER COMPANY
Request for a General Rate Revision.

AFFIDAVIT OF CARLA BIRD

State of Oregon)
County of Marion) ss.

I, CARLA BIRD, hereby depose and say:

1. I am employed as a Senior Revenue Requirements Analyst in the Revenue Requirements Section of the Electric and Natural Gas Division of the Public Utility Commission of Oregon.
2. In the course of my employment, I drafted direct testimony in support of Staff's initial position in this case, pre-filed as Staff Exhibit 100, and created three exhibits, including my witness qualification statement, pre-filed as Staff Exhibit 101.
3. I also drafted joint testimony in support of the Partial Stipulation reached in this case, pre-filed as Joint Exhibit 100.

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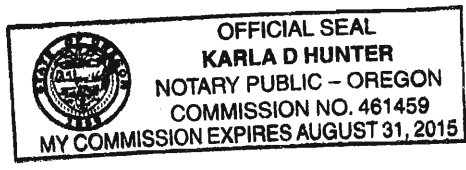
4. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibit 100 and Joint Exhibit 100 and my witness qualification statement in Staff Exhibit 101 are true and accurate.


CARLA BIRD

SUBSCRIBED AND SWORN to before me this 1 day of February, 2012.



Notary Public for Oregon
My Commission Expires:



CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of February, 2012, I served the foregoing Staff Motion to Admit Exhibits into Record upon the persons named on the service list, by mailing a full, true and correct copy thereof and to such persons waiving such service by mail who were served at their e-mail address as listed on the service list.

W Gregory M. Adams (Confidential) (Highly Confidential) Richardson & O'Leary greg@richardsonandoleary.com	W Christa Bearry (Confidential) (Highly Confidential) Idaho Power Company cbearry@idahopower.com	W Carla Bird (Confidential) (Highly Confidential) OPUC carla.bird@state.or.us
W Randy Dahlgren PBE pge.opuc.filings@pgn.com	W Gordon Feighner (Confidential) (Highly Confidential) CUB gordon@oregoncub.org	W Robert Jenks (Confidential) (Highly Confidential) CUB bob@oregoncub.org
W Joshua D. Johnson (Confidential) (Highly Confidential) Attorney at Law jdj@racinelaw.net	W Judy Johnson (Confidential) (Highly Confidential) OPUC judy.johnson@state.or.us	W G. Catriona McCracken (Confidential) (Highly Confidential) CUB catriona@oregoncub.org
W Lisa D. Nordstrom (Confidential) (Highly Confidential) Idaho Power Company lnordstrom@idahopower.com	W Eric L. Olsen (Confidential) (Highly Confidential) Attorney at Law elo@racinelaw.net	W Lisa F. Rackner (Confidential) (Highly Confidential) McDowell Rackner & Gibson PC lisa@mcd-law.com
W Don Reading (Confidential) (Highly Confidential) dreading@mindspring.com	W Peter J. Richardson (Confidential) (Highly Confidential) Richardson & O'Leary PLLC peter@richardsonandoleary.com	W Douglas C. Tingey PGE doug.tingey@pgn.com
W Anthony J. Yankel (Confidential) (Highly Confidential) Utility Net.Inc tony@yankel.net		

DATED: February 16, 2012

Stephanie Andrus, OSB #925123
Senior Assistant Attorney General