

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

April 18, 2013

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: UE 257 In The Matter of IDAHO POWER COMPANY's 2013 Annual Power Cost Update

Attention Filing Center:

Enclosed in the above-referenced docket are an original and five copies of the Stipulation and the Joint Explanatory Brief in support of the Stipulation. The original signature pages will be sent separately.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached Certificate of Service. Please contact this office with any questions.

Very truly yours,

Wendy McIndoo
Office Manager

Enclosures
cc: Service List

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UE 257 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below.

OPUC Dockets
Citizens' Utility Board of Oregon
dockets@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

Catriona McCracken
Citizens' Utility Board of Oregon
catriona@oregoncub.org

Michael T. Weirich
Department of
Justice Michael.weirich@state.or.us

John Crider
Public Utility Commission of Oregon
john.crider@state.or.us

DATED: April 18, 2013



Wendy McIndoo
Office Manager

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

3 **UE 257**

4 In the Matter of:

5 Idaho Power Company's 2013 Annual
6 Power Cost Update

PARTIAL STIPULATION

7 This Partial Stipulation resolves all issues among the parties to this Partial Stipulation
8 related to Idaho Power Company's ("Idaho Power" or "Company") March Forecast component
9 of the 2013 Annual Power Cost Update ("APCU") filed pursuant to Order No. 08-238.¹ The
10 APCU updates the Company's net power supply expense and results in new rates, to be
11 effective June 1, 2013.

12 **PARTIES**

13 1. The parties to this Partial Stipulation are Staff of the Public Utility Commission of
14 Oregon ("Staff"), the Citizens' Utility Board of Oregon ("CUB") and Idaho Power (together, the
15 "Stipulating Parties").

16 **BACKGROUND**

17 2. Pursuant to Order No. 08-238, Idaho Power annually updates its net power
18 supply expense included in rates through an automatic adjustment clause, the APCU. The
19 APCU is comprised of two components—an "October Update" and a "March Forecast." The
20 October Update contains the Company's forecasted net power supply expense reflected on a
21 normalized unit basis for an April through March test period. The March Forecast contains the
22 Company's net power supply expense based upon updated actual forecasted conditions.
23 Pursuant to Order No. 10-191² the Company allocates the APCU revenue requirement to

24

¹ *Re Idaho Power Company's Application for Authority to Implement a Power Cost Adjustment*
25 *Mechanism*, Docket UE 195, Order No. 08-238 (Apr. 28, 2008).

26 ² *Re Idaho Power Company's 2010 Annual Power Cost Update*, Docket UE 214, Order No. 10-191
(May 24, 2010).

1 individual customer classes on the basis of the total generation-related revenue requirement
2 approved in the Company's last general rate case, instead of the previous equal cents per
3 kWh approved in Order No. 08-238. Order No. 10-191 also directs the Company to adjust its
4 base rates to reflect changes in revenue requirement related to the October Update, while the
5 rates resulting from the March Forecast are listed on Schedule 55. The rates associated with
6 the October Update and the March Forecast become effective on June 1 of each year.

7 3. On October 24, 2012, Idaho Power filed testimony and exhibits for the 2013
8 APCU ("2013 October Update").³

9 4. On October 31, 2012, CUB filed its Notice of Intervention. On November 16,
10 2012, Administrative Law Judge ("ALJ") Lisa Hardie held a prehearing conference at which
11 the parties to Docket UE 257 agreed upon a procedural schedule that would allow the Public
12 Utility Commission of Oregon ("Commission") to issue an order on Idaho Power's 2013 APCU
13 prior to June 1, 2013.⁴

14 5. Staff and CUB served discovery on Idaho Power and conducted a thorough
15 investigation of the 2013 October Update. Thereafter, the Stipulating Parties participated in
16 two settlement conference and ultimately agreed to a settlement. On January 25, 2013, the
17 Stipulating Parties filed a Partial Stipulation that resolved all issues related to the 2013
18 October Update (hereinafter, the "October Update Stipulation"). The October Update
19 Stipulation included a cost per unit of \$23.13 per MWh.

20 6. Pursuant to the procedural schedule adopted by ALJ Hardie on November 16,
21 2012, and the terms of the October Update Stipulation, on March 22, 2013, Idaho Power filed
22 its March Forecast. The March Forecast consisted of direct testimony describing the
23 Company's estimate of the expected net power supply expense for the upcoming water
24

25 ³ See Idaho Power/100-107.

26 ⁴ *Re Idaho Power Company's 2013 Annual Power Cost Update*, Docket UE 257, Prehearing
Conference Memorandum at 1 (Nov. 16, 2012).

1 year—April 2013 through March 2014.⁵ Order No. 08-238 calls for the March Forecast to
2 update the following variables: fuel prices, transportation costs, wheeling expenses, planned
3 and forced outages, heat rates, forecast of normalized sales and loads updated for significant
4 changes since the October Update, forecast hydro generation, wholesale power purchase and
5 sale contracts, forward price curve, Public Utility Regulatory Policies Act of 1978 (“PURPA”)
6 expenses, and the Oregon state allocation factor.⁶ In this year’s filing, however, the only
7 variables that had changed since the October Update were (1) fuel prices; (2) the forecast of
8 hydro conditions from the Northwest River Forecast Center (“NRFC”); (3) known power
9 purchases and surplus sales resulting from the Company’s Risk Management Policy; (4) the
10 forward price curve in accordance with Order No. 08-238; and (5) PURPA contract expenses.⁷

11 7. The fuel prices were updated to reflect changes in forecast natural gas and coal
12 costs.⁸ The hydro update, based upon updated streamflow forecasts and reservoir levels
13 from the NFRC, reflected the fact that this year’s forecasts are significantly lower than last
14 year’s.⁹ The decreased hydro forecast resulted in higher variable power supply expenses
15 because less hydro generation results in increased market purchases and decreased off-
16 system sales.¹⁰ The 2013 March Forecast also included reduced PURPA expenses, which
17 were the result of the Company removing five PURPA contracts from the model. These five
18 contracts are not expected to result in actual generation during the test period and have either
19 been terminated by Idaho Power or by agreement of the contracting parties.¹¹

20
21 _____
22 ⁵ Idaho Power/200-205.

23 ⁶ Idaho Power/200, Wright/2.

24 ⁷ Idaho Power/200, Wright/2-3.

25 ⁸ Idaho Power/200, Wright/3-5.

26 ⁹ Idaho Power/200, Wright/5-6.

¹⁰ Idaho Power/200, Wright/6.

¹¹ Idaho Power/200, Wright/7.

1 8. The Company calculated a cost per unit for the 2013 March Forecast of \$25.49
2 per MWh, which is \$4.66 per MWh more than last year's cost per unit of \$20.83 per MWh.¹²
3 This equates to a system-wide net power supply expense of \$358,445,038.¹³

4 9. Combining the price per unit from the October Update Stipulation and 2013
5 March Forecast resulted in a cost per unit of \$25.37 per MWh.¹⁴ The overall proposed revenue
6 impact of the combined rate is an increase of approximately 6.03 percent, or \$2.9 million.¹⁵

7 10. The 2013 March Forecast also included the Company's proposed rate spread
8 used to spread the revenue requirement to the various customer classes. The Company's
9 proposed allocation conformed to the methodology approved by the Commission in Order No.
10 10-191.¹⁶

11 11. On March 22, 2013, the Company also filed Tariff Advice No. 13-07, which
12 included the revised tariff sheets for the 2013 October Update and March Forecast. The rate
13 effective date on the revised tariff sheets is June 1, 2013.

14 12. A settlement conference was held on April 1, 2013. During that settlement
15 conference the Stipulating Parties agreed to resolve all the issues in this case, subject to Staff's
16 and CUB's review of additional discovery responses from Idaho Power. Thereafter Staff moved
17 to suspend the schedule and ALJ Patrick Power granted Staff's motion.¹⁷

18 13. This Partial Stipulation, presented on behalf of all parties to the docket, resolves
19 all issues in the docket related to the 2013 March Forecast. Together with the October Update
20 Stipulation this Partial Stipulation resolves all the issues in this docket.

21

22 ¹² Idaho Power/200, Wright/8-9.

23 ¹³ Idaho Power/203.

24 ¹⁴ Idaho Power/203.

25 ¹⁵ Idaho Power/200, Wright/11.

26 ¹⁶ Idaho Power/200, Wright/9-10; Order No. 10-191.

26 ¹⁷ *Re Idaho Power Company's 2012 Annual Power Cost Update*, Docket UE 257, Ruling (April 2, 2013).

AGREEMENT

14. The Stipulating Parties agree that the calculation of the agreed upon cost per unit rate in the March Forecast and the combined rate is correct and in conformance with the methodology adopted by the Commission in Order No. 08-238 and the Stipulating Parties agree that the rates resulting from the agreed upon cost per unit are fair, just, and reasonable.

15. The Stipulating Parties agree that the Company's allocation methodology conforms to that adopted by the Commission in Order No. 10-191.

16. The Stipulating Parties agree that rates agreed to by the terms of this Stipulation should be made effective on June 1, 2013.

17. For purposes of this Partial Stipulation, the Stipulating Parties agree that the existing and past practice of repricing Idaho's levelized PURPA contracts to reflect Oregon's non-levelized requirements is reasonable.

18. The Stipulating Parties agree to submit this Partial Stipulation to the Commission and request that the Commission approve the Partial Stipulation as presented. The Stipulating Parties agree that the adjustments and the rates resulting from the Partial Stipulation are fair, just, and reasonable.

19. This Partial Stipulation will be offered into the record of this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Partial Stipulation throughout this proceeding and any appeal, (if necessary) provide witnesses to sponsor this Partial Stipulation at the hearing, and recommend that the Commission issue an order adopting the settlements contained herein.

20. If this Partial Stipulation is challenged, the Stipulating Parties agree that they will continue to support the Commission's adoption of the terms of this Partial Stipulation. The Stipulating Parties agree to cooperate in cross-examination and put on such a case as they deem appropriate to respond fully to the issues presented, which may include raising issues that are incorporated in the settlements embodied in this Partial Stipulation.

1 21. The Stipulating Parties have negotiated this Partial Stipulation as an integrated
2 document. If the Commission rejects all or any material part of this Partial Stipulation, or adds
3 any material condition to any final order that is not consistent with this Partial Stipulation, each
4 Stipulating Party reserves its right, pursuant to OAR 860-001-0350(9), to present evidence and
5 argument on the record in support of the Partial Stipulation or to withdraw from the Partial
6 Stipulation. Stipulating Parties shall be entitled to seek rehearing or reconsideration pursuant to
7 OAR 860-001-0720 in any manner that is consistent with the agreement embodied in this Partial
8 Stipulation.

9 22. By entering into this Partial Stipulation, no Stipulating Party shall be deemed to
10 have approved, admitted, or consented to the facts, principles, methods, or theories employed
11 by any other Stipulating Party in arriving at the terms of this Partial Stipulation, other than those
12 specifically identified in the body of this Partial Stipulation. No Stipulating Party shall be
13 deemed to have agreed that any provision of this Partial Stipulation is appropriate for resolving
14 issues in any other proceeding, except as specifically identified in this Partial Stipulation.

15 23. This Partial Stipulation may be executed in counterparts and each signed
16 counterpart shall constitute an original document.

17 This Partial Stipulation is entered into by each Stipulating Party on the date entered below
18 such Stipulating Party's signature.

19

20

21

22

23

24

25

26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

STAFF

By: Mike

Date: 4/18/13

IDAHO POWER

CITIZENS' UTILITY BOARD OF OREGON

By: _____

By: _____

Date: _____

Date: _____

1 STAFF

2 By: _____

3 Date: _____

4
5 IDAHO POWER

6 By:  _____

7 Date: 4/18/13 _____

CITIZENS' UTILITY BOARD OF OREGON

By: _____

Date: _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26


STAFF

By: _____
Date: _____

IDAHO POWER

By: _____
Date: _____

CITIZENS' UTILITY BOARD OF OREGON

By: 
Date: 4-18-13

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

3 **UE 257**

4 In the Matter of:

5 Idaho Power Company's 2013 Annual
6 Power Cost Update

JOINT EXPLANATORY BRIEF

7 This brief explains and supports the two Partial Stipulations filed in this proceeding on
8 January 25, 2013, and April 18, 2013, among Idaho Power Company ("Idaho Power" or
9 "Company"), the Citizens' Utility Board of Oregon ("CUB"), and Staff of the Public Utility
10 Commission of Oregon ("Staff") (together, the "Stipulating Parties"). These two Partial
11 Stipulations resolve all issues raised by the Stipulating Parties related to Idaho Power's 2013
12 Annual Power Cost Update ("APCU").

13 **I. BACKGROUND**

14 **A. Idaho Power's APCU and Power Cost Adjustment Mechanism.**

15 In Order No. 08-238 the Commission approved an automatic adjustment clause that
16 allows Idaho Power to annually update its net power supply expense included in rates.¹ This
17 automatic adjustment clause is referred to as the APCU and has two components—an
18 "October Update" and a "March Forecast." The October Update contains the Company's
19 forecasted net power supply expense reflected on a normalized and unit basis for an April
20 through March test period. The March Forecast contains the Company's net power supply
21 expense based upon updated actual forecasted conditions. The rates from the October
22 Update and March Forecast are to become effective on June 1 of each year.

23
24
25 _____
26 ¹ *Re Idaho Power Company's Application for Authority to Implement a Power Cost Adjustment Mechanism*, Docket UE 195, Order No. 08-238 (Apr. 28, 2008).

1 **B. The 2013 APCU.**

2 On October 24, 2012, Idaho Power filed testimony and exhibits for the 2013 APCU
3 ("2013 October Update").² Pursuant to Order No. 08-238 the 2013 October Update updated
4 the following variables: loads, fuel prices, transportation costs, maintenance rates, heat rates,
5 and forced outage rates for thermal plants.³ The test period for the 2013 October Update was
6 April 2013 through March 2014 and included updated plant capacities for all Company owned
7 resources and updated sales and load forecast.⁴ The 2013 October Update specifically
8 accounted for changes in natural gas and coal prices, generation and expenses related to
9 contracts entered into pursuant to the Public Utility Regulatory Policies Act of 1978
10 ("PURPA"), and the addition of the costs and benefits associated with the Langley Gulch
11 power plant and Neal Hot Springs geothermal power purchase agreement ("PPA").⁵

12 The primary drivers of the increased net power supply expenses included in the 2013
13 October Update were the removal of the Hoku special contract, the inclusion of the Neal Hot
14 Springs PPA, lower electricity market prices resulting in less revenue from off-system sales,
15 reduced hydro generation due to lower stream flows, and a reduction in the Company's
16 system load.⁶

17 The 2013 October Update resulted in a cost per unit of \$23.41 per megawatt-hour
18 ("MWh").⁷ This represents an increase of \$3.94 per MWh over last year's October Update.⁸

19 The 2012 October Update also reflected the allocation of the APCU's revenue
20 requirement approved by the Commission in Order No. 10-191.⁹ Pursuant to that order the

21

² See Idaho Power/100-107.

22 ³ Idaho Power/100, Wright/2.

23 ⁴ Idaho Power/100, Wright/2.

24 ⁵ Idaho Power/100, Wright/2-3.

25 ⁶ Idaho Power/100, Wright/9-10.

26 ⁷ Idaho Power/100, Wright/8.

26 ⁸ Idaho Power/100, Wright/8.

1 Company allocates the APCU revenue requirement to individual customer classes on the
2 basis of the total generation-related revenue requirement approved in the Company's last
3 general rate case, instead of the previous equal cents per kWh approved in Order No. 08-238.
4 Order No. 10-191 also directs the Company to adjust its base rates to reflect changes in
5 revenue requirement related to the October Update, while the rates resulting from the March
6 Forecast are listed on Schedule 55.

7 CUB filed its Notice of Intervention on October 31, 2012, and on November 16, 2012,
8 Administrative Law Judge ("ALJ") Lisa Hardie held a prehearing conference at which the
9 parties to the docket agreed upon a procedural schedule that would allow the Commission to
10 issue an order on Idaho Power's 2013 APCU prior to June 1, 2013.¹⁰

11 Staff and CUB served discovery on Idaho Power and conducted a thorough investigation
12 of the 2013 October Update. When responding to discovery, the Company revised Exhibits
13 101, 105 and 106 to the 2013 October Update to include an additional year of hydro
14 generation that was inadvertently omitted from the original filed computations. The original
15 filing made on October 24, 2012, included 83 years of hydro generation and should have
16 included the 84 years of hydro data. As a result of this correction, the cost per unit on Exhibit
17 105 dropped from \$23.41 per MWh to \$23.34 per MWh.

18 The Stipulating Parties participated in two settlement conference and ultimately agreed
19 to a settlement of all issues related to the 2013 October Update. On January 25, 2013, the
20 Stipulating Parties filed a Partial Stipulation reflecting the agreed upon settlement (hereinafter,
21 the "October Update Stipulation"). The October Update Stipulation included a cost per unit of
22 \$23.13 per MWh.

24 ⁹ Idaho Power/100, Wright/7-8; *Re Idaho Power Company's 2010 Annual Power Cost Update*, Docket
25 UE 214, Order No. 10-191 (May 24, 2010).

26 ¹⁰ *Re Idaho Power Company's 2013 Annual Power Cost Update*, Docket UE 257, Prehearing
Conference Memorandum at 1 (Nov. 16, 2012).

1 On March 22, 2013, the Company filed its 2013 March Forecast, which consisted of
2 direct testimony describing the Company's estimate of the expected net power supply
3 expense for the upcoming water year—April 2013 through March 2014.¹¹ Order No. 08-238
4 calls for the March Forecast to update the following variables: fuel prices, transportation costs,
5 wheeling expenses, planned and forced outages, heat rates, forecast of normalized sales and
6 loads updated for significant changes since the 2012 October Update, forecast hydro
7 generation, wholesale power purchase and sale contracts, forward price curve, PURPA
8 expenses, and the Oregon state allocation factor.¹² In this year's filing, however, the only
9 variables that had changed since the October Update were (1) fuel prices; (2) the forecast of
10 hydro conditions from the Northwest River Forecast Center ("NRFC"); (3) known power
11 purchases and surplus sales resulting from the Company's Risk Management Policy; (4) the
12 forward price curve in accordance with Order No. 08-238; and (5) PURPA contract
13 expenses.¹³

14 The fuel prices were updated to reflect changes in forecast natural gas and coal costs.¹⁴
15 The hydro update, based upon updated streamflow forecasts and reservoir levels from the
16 NRFC, reflected the fact that this year's forecasts are significantly lower than last year's.¹⁵
17 The decreased hydro forecast resulted in higher variable power supply expenses because
18 less hydro generation results in increased market purchases and decreased off-system
19 sales.¹⁶ The 2013 March Forecast also included reduced PURPA expenses, which were the
20 result of the Company removing five PURPA contracts from the model. These five contracts
21

22 ¹¹ Idaho Power/200-205.

23 ¹² Idaho Power/200, Wright/2.

24 ¹³ Idaho Power/200, Wright/2-3.

25 ¹⁴ Idaho Power/200, Wright/3-5.

26 ¹⁵ Idaho Power/200, Wright/5-6.

¹⁶ Idaho Power/200, Wright/6.

1 are not expected to result in actual generation during the test period and have either been
2 terminated by Idaho Power or by agreement of the contracting parties.¹⁷

3 The Company calculated a cost per unit for the 2013 March Forecast of \$25.49 per
4 MWh, which is \$4.66 per MWh more than last year's cost per unit of \$20.83 per MWh.¹⁸ This
5 equates to a system-wide net power supply expense of \$358,445,038.¹⁹

6 Combining the October Update Stipulation and 2013 March Forecast resulted in a cost
7 per unit of \$25.37 per MWh.²⁰ The overall proposed revenue impact of the combined rate is
8 an increase of approximately 6.03 percent, or \$2.9 million.²¹

9 The 2013 March Forecast also included the Company's proposed rate spread used to
10 spread the revenue requirement to the various customer classes. The Company's proposed
11 allocation conformed to the methodology approved by the Commission in Order No. 10-191.²²

12 On March 22, 2013, the Company also filed Tariff Advice No. 13-07, which included the
13 revised tariff sheets for the 2013 October Update and March Forecast. The rate effective date
14 on the revised tariff sheets is June 1, 2013.

15 A second settlement conference was held on April 1, 2013. During that settlement
16 conference the Stipulating Parties agree to resolve all the issues in this case, subject to Staff's
17 and CUB's review of additional discovery responses from Idaho Power. Thereafter Staff
18 moved to suspend the schedule and ALJ Patrick Power granted Staff's motion.²³

21 _____
¹⁷ Idaho Power/200, Wright/7.

22 ¹⁸ Idaho Power/200, Wright/8-9.

23 ¹⁹ Idaho Power/203.

24 ²⁰ Idaho Power/203.

25 ²¹ Idaho Power/200, Wright/11.

26 ²² Idaho Power/200, Wright/9-10; Order No. 10-191.

²³ *Re Idaho Power Company's 2012 Annual Power Cost Update*, Docket UE 257, Ruling (April 2, 2012).

1 On April 18, 2013, the Stipulating Parties filed a second Partial Stipulation that resolved
2 all the issues related to the 2013 March Update ("March Update Stipulation"). The two Partial
3 Stipulations, presented on behalf of all parties to the docket, resolve all issues in the docket.

4 II. DISCUSSION

5 A. Terms of the Partial Stipulations.

6 In the October Update Stipulation the Stipulating Parties agreed that the Company's
7 2013 October Update was calculated in conformance with the methodology adopted by the
8 Commission in Order No. 08-238, subject to the adjustments described in the October Update
9 Stipulation. The Stipulating Parties agreed to adjust the Company's filed 2013 October
10 Update to include only 6 months (October 2013 – March 2014) of the Dynamis PURPA
11 contract and included all 84 years of hydro generation. These adjustments reduced the filed
12 Total Net Power Supply Expenses ("NPSE"), to \$325.2 million, a decrease of \$3 million on a
13 total system basis.

14 In the March Update Stipulation the Stipulating Parties agreed that the Company's
15 March Update was calculated correctly and in conformance with the terms of Order No. 08-
16 238. In the March Update Stipulation the Stipulating Parties agreed to a cost per unit of
17 \$25.37 per MWh. The Stipulating Parties also agreed that the rates resulting from both the
18 Partial Stipulations were just and reasonable.

19 Both Partial Stipulations also reflected the Stipulating Parties agreement that the
20 Company's allocation methodology conforms to that adopted by the Commission in Order No.
21 10-191.

22 Further, the Stipulating Parties agreed that for purposes of these Partial Stipulations, the
23 existing and past practice of repricing Idaho's levelized PURPA contracts to reflect Oregon's
24 non-levelized requirements is reasonable.

25 The Stipulating Parties also agreed to make the rates resulting from these Partial
26 Stipulations effective June 1, 2013.

1 **B. The Partial Stipulations Will Result in Just and Reasonable Rates.**

2 The Commission will approve a stipulation if it is an appropriate resolution of the issues
3 in a case²⁴ and results in just and reasonable rates.²⁵ When evaluating these rates, the
4 Commission examines “the reasonableness of the overall rates.”²⁶ Here, the Stipulating
5 Parties agree that the agreed upon cost per unit rate was correctly calculated using the
6 methodology approved by the Commission in Order No. 08-238. The Stipulating Parties also
7 agree that the Company’s proposed rate spread conforms to the methodology approved by
8 the Commission in Order No. 10-191. Because the Company’s filed case reflects correct
9 calculations that conform to Commission precedent, the resulting rates are just and
10 reasonable and fall within the “range of reasonableness” for resolution of these issues.²⁷

11 *////*

12 *////*

13 *////*

14 *////*

15 *////*

16 *////*

17 *////*

18 *////*

20 ²⁴ See *Re PacifiCorp’s 2010 Transition Adjustment Mechanism*, Docket UE 207, Order No. 09-432 at 6
21 (Oct. 30, 2009) (“The Commission concludes that the Stipulation is an appropriate resolution of all
22 primary issues in this docket.”); See *Re PacifiCorp Request for a General Rate Revision*, Docket UE
23 210, Order No. 10-022 at 6 (Jan. 26, 2010) (“When considering a stipulation, we have the statutory duty
24 to make an independent judgment as to whether any given settlement constitutes a reasonable
25 resolution of the issues.”).

26 ²⁵ See *Re. PacifiCorp Request for a General Rate*, Docket UE 217, Order No. 10-473 at 7 (Dec. 14,
27 2010) (“We have reviewed the Stipulation, and find that it will result in rates that are fair, just, and
28 reasonable.”).

29 ²⁶ *Re. Application of Portland General Electric Co. for an Investigation into Least Cost Plant Retirement*,
30 Docket DR 10 *et al.*, Order No. 08-487 at 7-8 (Sept. 30, 2008).

31 ²⁷ See *Re US West*, Docket UM 773, Order No. 96-284 at 31 (Nov. 1, 1999).

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

4

5

5

6
7
8

9
0
1

2
3
4
5

6
7
8