

# McDowell & Rackner PC



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

December 30, 2008

## VIA ELECTRONIC FILING

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

**Re: Docket UE 202**

Enclosed for filing in the above-referenced docket are an original and five copies of errata pages 4 and 9 of the Parties' Brief in Support of Stipulation which was originally filed on December 15, 2008. These pages are filed to make a correction in the reference to Attachments 1 and 2 and should replace pages 4 and 9 in the original Brief. Both the redlined and clean versions are enclosed for your reference.

Also enclosed is a copy of the Proposed Tariff Schedule 92 (Exhibit A to the Stipulation) which was inadvertently omitted from the Stipulation filed on October 3, 2008.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo  
Legal Assistant

Enclosures

cc: UE 202 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 202 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

Stephanie S. Andrus  
Department of Justice  
1162 Court St NE  
Salem, OR 97301-4096  
stephanie.andrus@state.or.us

DATED: December 30, 2008.

  
\_\_\_\_\_  
Wendy McIndoo  
Legal Assistant  
  
Of Attorneys for Idaho Power Company

UE 202

Redlined copy of Errata pages 4 and 9  
of Parties' Brief in Support of Stipulation

1 due to financial and technical issues<sup>5</sup> and instead the IPUC adopted a phased-in  
2 implementation and collaborative evaluation approach, while directing the Company to  
3 continue to work towards implementation of AMI technology “as soon as possible.”<sup>6</sup>

4 On December 30, 2005, the Company filed its Phase One AMI Implementation  
5 Status Report with the IPUC detailing the limited AMI implementation as well as the time-  
6 variant pricing pilots and load control air conditioner cycling programs conducted with the  
7 AMI technology.<sup>7</sup> The report also made recommendations for future evaluation and  
8 deployment.<sup>8</sup> The IPUC granted the Company an additional one-year period in which to  
9 work to resolve technical issues encountered in the pilot programs, allow for the technology  
10 to mature, and to assess further AMI deployment.<sup>9</sup> The IPUC ordered the Company to file  
11 an updated status report by May 1, 2007.<sup>10</sup>

12 On May 1, 2007, the Company filed a detailed AMI Status Report, followed by an  
13 August 31, 2007, Implementation Plan describing and proposing a three-year deployment,  
14 beginning January 2009 and continuing through the end of 2011.<sup>11</sup> The final Report and  
15 Implementation Plan ~~is attached hereto as Attachment No. 1~~ was submitted as part of  
16 Attachment No. 1 with the original application filed on October 3, 2008.

17 <sup>5</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Order  
18 No. 29226 at 2-3 (Apr. 15, 2003).

19 <sup>6</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Order  
20 No. 29362 at 12 (Oct. 24, 2003); *Idaho Power—Review of Phase One AMR Implementation Status*  
21 *Report*, IPUC Case No. IPC-E-06-01, Order No. 30102 at 5-6 (July 13, 2006).

22 <sup>7</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Phase  
23 One Implementation Status Report (Dec. 30, 2005).

24 <sup>8</sup> *Id.*

25 <sup>9</sup> *Idaho Power—Review of Phase One AMR Implementation Status Report*, IPUC Case No.  
26 IPC-E-06-01, Order No. 30102 at 6 (July 13, 2006).

<sup>10</sup> *Id.* at 7.

<sup>11</sup> *Idaho Power—Review of Phase One AMR Implementation Status Report*, IPUC Case No.  
IPC-E-06-01, Phase I AMI Implementation Status Report (May 1, 2007); *Idaho Power—Review of*  
*Phase One AMR Implementation Status Report*, IPUC Case No. IPC-E-06-01, AMI Implementation  
Plan (Aug. 31, 2007).

1 rates, \$416,355 = net increase, \$383,736).<sup>30</sup> The Company proposes that this net amount  
2 be recovered from customers by use of a tariff rider, in the amount of 0.0979 cents per  
3 kWh, that would be in place for the eighteen month period of accelerated depreciation,  
4 January 2009 through June 2010.<sup>31</sup>

5 The proposed Tariff Schedule 92 which is attached ~~hereto~~ to the Stipulation as  
6 ~~Attachment No. 2 Exhibit A~~, includes the following conditions: First, the Parties agree that  
7 the rider may be temporarily suspended or terminated should issues arise during the mass  
8 deployment period that will delay mass deployment, to or beyond June 30, 2009. Second,  
9 the Parties agree that Idaho Power will provide notice at least 45 days prior to the June 30,  
10 2009 date should it become aware of any specific issues that might cause a delay of mass  
11 deployment. Included as a special condition in the proposed tariff is a provision by which  
12 the rider may be terminated should the system-wide deployment not take place.

### 13 III. DISCUSSION

14 In the Stipulation, the Parties agree that:

- 15 1. Idaho Power may accelerate the depreciation of its existing metering  
16 equipment over an eighteen (18) month period starting on January 1, 2009,  
17 and ending June 30, 2010.
- 18 2. The effect of the accelerated depreciation should be offset by the effect of the  
19 revised depreciation studies filed in Docket UM 1395.
- 20 3. Idaho Power will file for a general rate proceeding by December 31, 2009  
21 which will include a permanent rate revision related to the findings in Docket  
22 UM 1395.

23  
24  
25 <sup>30</sup> Exhibit 302, Waites/1.

26 <sup>31</sup> *Id.*

**UE 202**

**Clean copy of Errata pages 4 and 9  
of Parties' Brief in Support of Stipulation**

1 due to financial and technical issues<sup>5</sup> and instead the IPUC adopted a phased-in  
2 implementation and collaborative evaluation approach, while directing the Company to  
3 continue to work towards implementation of AMI technology “as soon as possible.”<sup>6</sup>

4 On December 30, 2005, the Company filed its Phase One AMI Implementation  
5 Status Report with the IPUC detailing the limited AMI implementation as well as the time-  
6 variant pricing pilots and load control air conditioner cycling programs conducted with the  
7 AMI technology.<sup>7</sup> The report also made recommendations for future evaluation and  
8 deployment.<sup>8</sup> The IPUC granted the Company an additional one-year period in which to  
9 work to resolve technical issues encountered in the pilot programs, allow for the technology  
10 to mature, and to assess further AMI deployment.<sup>9</sup> The IPUC ordered the Company to file  
11 an updated status report by May 1, 2007.<sup>10</sup>

12 On May 1, 2007, the Company filed a detailed AMI Status Report, followed by an  
13 August 31, 2007, Implementation Plan describing and proposing a three-year deployment,  
14 beginning January 2009 and continuing through the end of 2011.<sup>11</sup> The final Report and  
15 Implementation Plan was submitted as part of Attachment No. 1 with the original  
16 application filed on October 3, 2008.

17 <sup>5</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Order  
18 No. 29226 at 2-3 (Apr. 15, 2003).

19 <sup>6</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Order  
20 No. 29362 at 12 (Oct. 24, 2003); *Idaho Power—Review of Phase One AMR Implementation Status*  
21 *Report*, IPUC Case No. IPC-E-06-01, Order No. 30102 at 5-6 (July 13, 2006).

22 <sup>7</sup> *Automated Meter Reading and Time-of-Use Pricing*, IPUC Case No. IPC-E-02-12, Phase  
23 One Implementation Status Report (Dec. 30, 2005).

24 <sup>8</sup> *Id.*

25 <sup>9</sup> *Idaho Power—Review of Phase One AMR Implementation Status Report*, IPUC Case No.  
26 IPC-E-06-01, Order No. 30102 at 6 (July 13, 2006).

<sup>10</sup> *Id.* at 7.

<sup>11</sup> *Idaho Power—Review of Phase One AMR Implementation Status Report*, IPUC Case No.  
IPC-E-06-01, Phase I AMI Implementation Status Report (May 1, 2007); *Idaho Power—Review of*  
*Phase One AMR Implementation Status Report*, IPUC Case No. IPC-E-06-01, AMI Implementation  
Plan (Aug. 31, 2007).

1 rates, \$416,355 = net increase, \$383,736).<sup>30</sup> The Company proposes that this net amount  
2 be recovered from customers by use of a tariff rider, in the amount of 0.0979 cents per  
3 kWh, that would be in place for the eighteen month period of accelerated depreciation,  
4 January 2009 through June 2010.<sup>31</sup>

5 The proposed Tariff Schedule 92 which is attached to the Stipulation as Exhibit A,  
6 includes the following conditions: First, the Parties agree that the rider may be temporarily  
7 suspended or terminated should issues arise during the mass deployment period that will  
8 delay mass deployment, to or beyond June 30, 2009. Second, the Parties agree that Idaho  
9 Power will provide notice at least 45 days prior to the June 30, 2009 date should it become  
10 aware of any specific issues that might cause a delay of mass deployment. Included as a  
11 special condition in the proposed tariff is a provision by which the rider may be terminated  
12 should the system-wide deployment not take place.

### 13 III. DISCUSSION

14 In the Stipulation, the Parties agree that:

- 15 1. Idaho Power may accelerate the depreciation of its existing metering  
16 equipment over an eighteen (18) month period starting on January 1, 2009,  
17 and ending June 30, 2010.
- 18 2. The effect of the accelerated depreciation should be offset by the effect of the  
19 revised depreciation studies filed in Docket UM 1395.
- 20 3. Idaho Power will file for a general rate proceeding by December 31, 2009  
21 which will include a permanent rate revision related to the findings in Docket  
22 UM 1395.

23  
24  
25 <sup>30</sup> Exhibit 302, Waites/1.

26 <sup>31</sup> *Id.*