

# McDowell Rackner & Gibson PC



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July 29, 2011

## VIA ELECTRONIC FILING AND HAND DELIVERY

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
550 Capitol Street NE, Suite 215  
Salem, OR 97308-2148

**Re: Docket No. UE \_\_\_\_\_**  
In the Matter of the Application of Idaho Power Company for Authority to Increase its Rates and Charges for Electric Service in the State of Oregon

Enclosed for filing by Idaho Power Company are an original and 30 copies of the Application of Idaho Power Company for Authority to Increase its Rates and Charges for Electric Service in the State of Oregon, including the following proposed tariff pages associated with the Company's Tariff P.U.C. ORE No. E-27 applicable to electric service in the State of Oregon, together with the Executive Summary, supporting direct testimony and exhibits. The tariffs reflect an effective date of September 1, 2011.

Sixth Sheet No. 1-2	Cancelling	Fifth Revised Sheet No. 1-2
Second Sheet No. 7-1	Cancelling	First Revised Sheet No. 7-1
Fourth Sheet No. 7-2	Cancelling	Third Revised Sheet No. 7-2
First Revised Sheet No. 9-2	Cancelling	Original Sheet No. 9-2
Fifth Revised Sheet No. 9-3	Cancelling	Fourth Revised Sheet No. 9-3
Fourth Revised Sheet No. 9-4	Cancelling	Third Revised Sheet No. 9-4
Third Revised Sheet No. 15-2	Cancelling	Second Revised Sheet No. 15-2
Fifth Revised Sheet No. 19-3	Cancelling	Fourth Revised Sheet No. 19-3
Fourth Revised Sheet No. 19-4	Cancelling	Third Revised Sheet No. 19-4
Fourth Revised Sheet No. 19-5	Cancelling	Third Revised Sheet No. 19-5
Fifth Revised Sheet No. 24-3	Cancelling	Fourth Revised Sheet No. 24-3
First Revised Sheet No. 40-1	Cancelling	Original Sheet No. 40-1
Sixth Revised Sheet No. 40-2	Cancelling	Fifth Revised Sheet No. 40-2
First Revised Sheet No. 41-1	Cancelling	Original Sheet No. 41-1
Fifth Revised Sheet No. 41-2	Cancelling	Fourth Revised Sheet No. 41-2

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Fifth Revised Sheet No. 41-3	Cancelling	Fourth Revised Sheet No. 41-3
Fourth Revised Sheet No. 41-4	Cancelling	Third Revised Sheet No. 41-4
Fifth Revised Sheet No. 42-1	Cancelling	Fourth Revised Sheet No. 42-1

Also enclosed are 3 copies of the CD containing a PDF version of the workpapers and Excel Spreadsheets, where available, corresponding to the pages in the PDF version. The CDs also contain Excel spreadsheets, where available, of the exhibits.

It is respectfully requested that all data requests regarding this matter be addressed to:

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Idaho Power waives paper service in this docket. Please address all communications related to this filing to:

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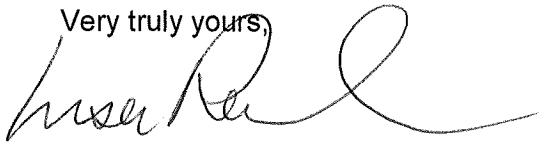
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Please direct informal correspondence and questions regarding this filing to Lisa Rackner at (503) 595-3925.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lisa Rackner", with a large, stylized flourish at the end.

Lisa Rackner

cc: Citizens' Utility Board of Oregon

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION OF  
IDAHO POWER COMPANY FOR  
AUTHORITY TO INCREASE ITS RATES  
AND CHARGES FOR ELECTRIC SERVICE  
TO ITS CUSTOMERS IN THE STATE OF  
OREGON.

**IDAHO POWER COMPANY'S  
EXECUTIVE SUMMARY**

**I. INTRODUCTION**

Idaho Power Company ("Idaho Power" or "Company") is filing a general rate increase with the Public Utility Commission of Oregon ("Commission"), pursuant to ORS 757.205, 757.215 and 757.220, to revise its schedules of rates and charges for electric service in Oregon to become effective with service provided on and after September 1, 2011. With this filing, the Company requests an increase to customer rates that will increase the Company's annual Oregon jurisdictional revenues by \$5.8 million, which is 14.7 percent greater than the revenues that could be generated under current rates. The revised rates produce revenues necessary to sustain the provision of stable, reliable, and low-cost electric service to customers in Oregon, while preserving the Company's ability to attract capital for future investments in system infrastructure. The Company files this executive summary in accordance with OAR 860-022-0019.

**II. BACKGROUND**

Idaho Power is an Idaho corporation whose principal place of business is 1221 West Idaho Street, Boise, Idaho 83702. Idaho Power is an electric company and a public utility providing electric service in Oregon within the meaning of ORS 757.005. The Company is subject to the jurisdiction of this Commission, the Idaho Public Utilities Commission, and the

1 Federal Energy Regulatory Commission. The Company provides electric service to  
2 approximately 18,453 customers in Oregon and approximately 492,073 total customers in  
3 Idaho and Oregon. In conducting its utility business, Idaho Power operates an  
4 interconnected and integrated system.

5 Communications regarding this filing should be addressed to:

6	Lisa D. Nordstrom	Lisa Rackner
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18 Company, should be addressed to:

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1 **III. CASE SUMMARY**

2 **A. The Test Year**

3 The Company's test year in this case is the twelve months ending December 31,  
4 2011 ("2011 Test Year"). Idaho Power provides information for a historical base period of  
5 twelve months ending December 31, 2010, and makes adjustments to that information to  
6 reflect the forecast 2011 Test Year. In order to meet the legal requirement that rates be fair,  
7 just, reasonable, and sufficient, the Company has selected a test year that closely reflects  
8 the investment and expense levels that will exist during the time that the rates adopted in  
9 this case are expected to be in effect. The new rates are filed with a requested effective  
10 date of September 1, 2011. Assuming the addition of the full nine-month statutory  
11 suspension period to the 30-day effective date now contained in the tariffs, the new rates  
12 would become effective June 1, 2012.

13 **B. Return on Equity**

14 In the Company's last Oregon general rate case, Docket UE 213, the Commission  
15 approved a stipulation that included a return on equity ("ROE") of 10.175 percent. The  
16 actual ROE earned by the Company over the last several years has been consistently below  
17 that level. Indeed, the average of the Oregon jurisdiction normalized ROE has been 1.17  
18 percent since 2005.

19 In this case, the Company seeks an ROE of 10.5 percent. This conservative request  
20 is necessary to maintain the financial integrity of the Company while ensuring its ability to  
21 provide safe, efficient, and reliable service to its Oregon customers with minimal rate impact.  
22 To achieve the 10.5 percent ROE, an Oregon jurisdictional revenue increase of \$5.8 million  
23 is necessary. The proposed rate increase constitutes an average overall price increase of  
24 14.7 percent in base rates. Even with this requested rate increase, the Company's Oregon  
25 customers will continue to benefit from some of the lowest electricity rates in the nation.

26

1 **C. Factors Driving Rate Adjustment**

2 **1. Investments in Plant to Serve Customers**

3 One of the key factors driving Idaho Power's need for a rate increase is the  
4 Company's increasing investment in plant to serve customers. This investment is the result  
5 of two factors—continuing customer load growth and the need to refurbish existing  
6 transmission, distribution, and generation infrastructure. Indeed, since the Company's last  
7 general rate case, it has placed in service over \$316 million in gross plant. These  
8 investments are necessary to ensure that Idaho Power's infrastructure maintains its  
9 operational viability and is able to continue to provide safe, reliable, and efficient energy at  
10 reasonable rates.

11 Although there has been some slowing of the rapid load growth the Company  
12 experienced several years ago, Idaho Power is still forecasting consistent load growth going  
13 forward. Indeed, the Company expects billed sales to increase an average of three percent  
14 over the next three years. The Company also anticipates adding new large loads. New  
15 loads totaling approximately 741 megawatts ("MW") have made inquiries to the Company  
16 and approximately 20 percent of those inquiries came from the Oregon service area.  
17 Overall, the Company expects to add up to 6,000 customers this year.

18 The Company's transmission investments include the new 500 kilovolt ("kV")  
19 Hemingway Transmission Station and the associated Hemingway to Bowmont 230 kV  
20 transmission line. The build-out of this critical transmission pathway will relieve transmission  
21 constraints and allow the Company to more easily import power to serve Idaho Power's  
22 growing customer load. This project, as well as others, has also increased the overall  
23 reliability of the Company's transmission network. In total, the Company's transmission line  
24 miles increased from 4,752 miles at the end of 2008 to 4,817 miles at the end of 2010.

25 The Company's investment in distribution plant in this case includes the completed  
26 deployment of the Advanced Metering Infrastructure ("AMI") technology in the Company's

1 Oregon service area. This deployment involved the installation of 17,500 smart meters and  
2 associated station and communication equipment. The Company also used innovative  
3 substation upgrade projects to improve the reliability of the distribution system and  
4 increased its total distribution line miles from 26,576 miles at the end of 2008 to 26,697  
5 miles at the end of 2010.

6 In addition to investments in the Company's transmission and distribution network,  
7 the costs reflected in this case also include substantial investment in the Company's  
8 generating fleet. These investments include upgrades and component replacements to  
9 aging hydroelectric and thermal generation facilities. The Company has also invested  
10 heavily in pollution control equipment at its Jim Bridger Power Plant. This pollution control  
11 equipment was mandated by the Regional Haze Best Available Retrofit Technology ruling  
12 from the state of Wyoming. As a result of these investments, the Company's total  
13 nameplate generating system capacity increased by 9 MW from 3,267 MW at the end of  
14 2008 to 3,276 MW at the end of 2010.

## 15 **2. Return on Equity**

16 As previously stated, the Company's request of a 10.5 percent ROE is necessary to  
17 maintain the financial integrity of the Company while ensuring its ability to provide safe,  
18 efficient, and reliable service to its Oregon customers with minimal rate impact.

## 19 **3. Growth in Expenses**

20 Another key factor driving Idaho Power's need for a rate increase is growth in  
21 expenses. The Company is experiencing cost increases related to power production,  
22 compliance requirements, reliability requirements, materials and supplies, land use fees,  
23 maintenance costs and labor costs.

## 24 **D. Cost Control Efforts**

25 The Company has taken great care to minimize the expenses and investments  
26 included in this case to ensure that in these difficult economic times the requested rate

1 increase is no greater than necessary. To this end, the Company's filing includes O&M  
2 expenses at the 2010 levels with the exception of specific cost categories that are "known"  
3 to be materially different in 2011. Moreover, the Company's overall O&M expenses have  
4 increased at a rate that is consistently less than the growth in the Consumer Price Index  
5 ("CPI") plus the growth in number of customers served expressed as a percentage. The  
6 Company's overall O&M expenses also compare favorably relative to other utilities in the  
7 western United States.

8 The Company has also aggressively controlled its labor costs. The Company  
9 decreased its headcount by approximately three percent from 2008 to 2010, while total  
10 customers served increased one percent over the same time period. And over the last two  
11 years of the down economy, the Company has provided for general wage adjustments that  
12 are below peer group adjustments to salary structures.

13 The Company's case also holds normalized total power supply expenses to the  
14 currently approved normalized levels determined under the October Update component of  
15 the 2011 Annual Power Cost Update. Although the total normalized 2011 power supply  
16 expenses is \$20.0 million *more* than the currently authorized power supply expense level,  
17 the Company is not seeking to include this amount in rates in this case.

18 With respect to investments in utility plant, the Company regularly and thoroughly  
19 analyzes its investment strategy and makes adjustments as necessary to account for the  
20 current economic climate. Moreover, the Company has aggressively promoted demand-  
21 side management and energy efficiency programs and services in an attempt to reduce the  
22 pace of growth in plant investment.

#### 23 IV. TESTIMONY SUMMARY

24 The Company's direct case consists of the testimony and exhibits of twelve  
25 witnesses:

26

1           **Gregory W. Said**, Vice President of Regulatory Affairs, provides a general overview  
2 of the case and introduces the Company witnesses and briefly describes their testimony.

3           **Darrel Anderson**, Executive Vice President of Administrative Services and Chief  
4 Financial Officer, provides an overview of the challenges facing the Company and the need  
5 for general rate relief that it is requested in this filing. Mr. Anderson also discusses the  
6 increased investment in generation plant, transmission facilities, distribution facilities, and  
7 general plant that has been required to provide for the needs of the Company's customers.  
8 He describes how reliability requirements, compliance requirements, and the costs of  
9 materials and supplies have impacted the level of investments. Finally, Mr. Anderson also  
10 addresses Company actions to manage ongoing expenses.

11           **Warren Kline**, Vice President of Customer Operations, describes the Company's  
12 careful management of costs incurred by the Company to benefit customers. Mr. Kline  
13 discusses the changes to the Company's Customer Service Operations organization that  
14 result in exemplary customer service and describes the nearing completion of meter  
15 replacement with AMI throughout the Company's system. Mr. Kline also discusses the  
16 Company's ongoing efforts to pursue all cost-effective energy efficiency

17           **William Avera**, President of FINCAP, Inc., testifies concerning the Company's cost  
18 of equity. He recommends a fair rate of return on equity range of 10.40 to 11.55 percent.  
19 His recommendations are based on his analysis of current capital market estimates using  
20 methods such as discounted cash flow analyses, capital asset pricing models, and  
21 comparable earnings methodologies. Dr. Avera also discusses flotation costs.

22           **Steven R. Keen**, Vice President Finance and Treasurer, builds on Dr. Avera's  
23 testimony by presenting the Company recommendation that the Commission authorize an  
24 ROE of 10.5 percent, which is at the low end of Dr. Avera's recommended range. Mr. Keen  
25 discusses the relevant risk factors impacting the Company and that contributed the  
26

1 Company's selection of 10.5 percent as the appropriate ROE. Mr. Keen also discusses the  
2 cost of debt and overall cost of capital of 8.17 percent.

3 **Douglas N. Jones**, Regulatory Accounting and Support Team Leader, presents  
4 actual 2010 financial data that serves as the auditable starting point for developing the 2011  
5 Test Year. Mr. Jones then quantifies the adjustments to that financial data that reflect  
6 previous Oregon and Idaho Commission directives regarding regulatory treatment of specific  
7 accounts.

8 **Scott Wright**, Regulatory Analyst, quantifies the 2011 normalized power supply  
9 expenses. Because the Company is not seeking recovery of these amounts in this case,  
10 Mr. Wright's testimony is informational and demonstrates the Company's desire to mitigate  
11 the size of its additional revenue request in this proceeding.

12 **Timothy Tatum**, Senior Manager of Cost of Service, provides testimony describing  
13 the 2011 Test Year based upon the 2010 actual financial data provided by Mr. Jones. Mr.  
14 Tatum also supervised the preparation of the jurisdictional separation study utilized to  
15 determine the Oregon jurisdictional revenue requirement.

16 **Kelly Noe**, Regulatory Analyst, presents the Oregon jurisdictional revenue  
17 requirement which was prepared under the direction of Mr. Tatum.

18 **Matthew T. Larkin**, Regulatory Analyst, describes the 2011 Retail Revenue  
19 Forecast provided to Ms. Noe for her determination of the Company's revenue deficiency.  
20 He also describes the Company's class cost-of-service model that is used in part to  
21 determine each customer class's responsibility for a portion of the total Oregon jurisdictional  
22 revenue requirement.

23 **Darlene Nemnich**, Senior Regulatory Analyst, describes the Company's rate design  
24 proposals for residential customers.

25

26

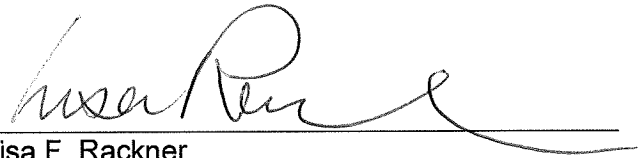
1           **Scott Sparks**, Senior Regulatory Analyst, describes the Company's rate design  
2 proposals for all other customer classes. Mr. Sparks also discusses proposed changes with  
3 regard to the Company's facilities charge computations.

4   **V. CONCLUSION**

5           The Company requests that the Commission issue an order approving of the  
6 proposed rate changes and approving the proposed tariffs.

7  
8           DATED: July 29, 2011.

**MCDOWELL RACKNER & GIBSON PC**



Lisa F. Rackner  
Adam Lowney

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**Exhibit A**  
**Summary of Requested Electric General Rate Increase**  
Oregon Jurisdiction  
Filed July 29, 2011

4	Total Revenues Collected Under Proposed Rates:	\$ 45,721,401
	Revenue Change Requested:	\$ 5,847,814
5	Revenues Net of any Credits from Federal Agencies:	\$ 5,847,814
	Percentage Change in Revenues Requested:	14.67%
6	Percentage Change in Revenues	
	Net of any Credits from Federal Agencies:	14.67%
7		
8	Test Period:	Calendar Year 2011
9	Requested Rate of Return on Capital:	8.17%
10	Requested Rate of Return on Equity:	10.50%
11	Proposed Rate Base:	\$ 121,853,764
12	Results of Operation <sup>1</sup>	
	Before Proposed Rate Change	
	Utility Operating Income:	\$ 7,057,029
13	Average Rate Base:	\$ 114,286,845
	Rate of Return on Capital:	6.175%
14	Rate of Return on Equity:	6.589%
	After Proposed Rate Change <sup>2</sup>	
15	Utility Operating Income:	\$ 9,955,453
	Average Rate Base:	\$ 121,853,764
16	Rate of Return on Capital:	8.17%
17	Rate of Return on Equity:	10.50%
18	Effect of Rate Change on Each Customer Class	
	Residential Service:	21.91%
	Small General Service:	4.82%
19	Large General Service, Secondary Voltage:	11.19%
	Large General Service, Primary Voltage:	5.32%
20	Large General Service, Transmission Voltage:	0.00%
	Area Lighting Service:	0.00%
21	Large Power Service, Primary Voltage:	0.00%
	Large Power Service, Transmission Voltage:	18.15%
22	Irrigation Service:	29.34%
	Unmetered General Service:	16.60%
23	Municipal Street Lighting Service:	3.69%
24	Traffic Control Lighting Service:	29.34%

<sup>1</sup> Based upon the Company's 2010 Report of Operations – JSS – Adj. Type I & II,

<sup>2</sup> Based upon the Company's 2011 general rate case filing.



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Proposed Tariffs

July 29, 2011

SCHEDULE 1  
RESIDENTIAL SERVICE  
 (Continued)

RESIDENTIAL SPACE HEATING (Continued)

Individual resistance-type units for space heating larger than 1,650 watts shall be designed to operate at 240 or 208 volts, and no single unit shall be larger than 6 kW. Heating units of two kW or larger shall be controlled by approved thermostatic devices. When a group of heating units, with a total capacity of more than 6 kW, is to be actuated by a single thermostat, the controlling switch shall be so designed that not more than 6 kW can be switched on or off at any one time. Supplemental resistance-type heaters, that may be used with a heat exchanger, shall comply with the specifications listed above for such units.

MONTHLY CHARGE

The Monthly Charge is the sum of the Service Charge, the Energy Charge, and the Power Supply Adjustment at the following rates, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), Schedule 95 (Adjustment for Municipal Exactions), and Schedule 98 (Residential and Small Farm Energy Credit).

Service Charge, per month	\$ 10.00		(I)
	<u>Summer</u>	<u>Non-Summer</u>	(C)
Energy Charge, per kWh			
0-1000 kWh	8.2222¢	8.2222¢	(C)(I)
Over 1000 kWh	10.0310¢	9.1266¢	(C)(I)
Power Supply Adjustment, per kWh	0.3507¢		

PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 7  
SMALL GENERAL SERVICE

AVAILABILITY

Service under this schedule is available at points on the Company's interconnected system within the State of Oregon where existing facilities of adequate capacity and desired phase and voltage are adjacent to the Premises to be served and additional investment by the Company for transmission, substation, or terminal facilities is not necessary to supply the desired service.

APPLICABILITY

Service under this schedule is applicable to Electric Service supplied to a Customer at one Point of Delivery and measured through one meter. This schedule is applicable to Customers whose metered energy usage is 3,000 kWh, or less, per Billing Period for ten or more Billing Periods during the most recent 12 consecutive Billing Periods. When the Customer's Billing Period is less than 27 days or greater than 36 days, the energy usage will be prorated to 30 days for purposes of determining eligibility under this schedule. Customers whose metered energy usage exceeds 3,000 kWh per Billing Period on an actual or prorated basis three times during the most recent 12 consecutive Billing Periods are not eligible for service under this schedule and will be automatically transferred to the applicable schedule effective with the next Billing Period. New customers may initially be placed on this schedule based on estimated usage.

This schedule is also applicable to non-profit or tax supported ball fields, fairgrounds or rodeo grounds with high demands and intermittent use exceeding 3,000 kWh per month. This schedule is not applicable to standby service, service for resale, or shared service, or to individual or multiple family dwellings, or agricultural irrigation service after October 31, 2005.

TYPE OF SERVICE

The type of service provided under this schedule is single- and/or three-phase, at approximately 60 cycles and at the standard service voltage available at the Premises to be served.

SUMMER NON-SUMMER SEASONS

The summer season begins on June 1 of each year and ends on August 31 of each year. The non-summer season begins on September 1 of each year and ends on May 31 of each year.

MONTHLY CHARGE

The Monthly Charge is the sum of the Service Charge, the Energy Charge, and the Power Supply Adjustment at the following rates, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), Schedule 95 (Adjustment for Municipal Exactions), and Schedule 98 (Residential and Small Farm Energy Credit).

	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month			
Single-Phase Service	\$ 10.00	\$ 10.00	(1)
Three-Phase Service	\$ 18.00	\$ 18.00	(1)

SCHEDULE 7  
SMALL GENERAL SERVICE  
 (Continued)

MONTHLY CHARGE (Continued)

	<u>Summer</u>	<u>Non-Summer</u>	
Energy Charge, per kWh			
0-500 kWh	6.6540¢	6.6540¢	(I)
Over 500 kWh	9.1026¢	7.4155¢	(I)
Power Supply Adjustment, per kWh	0.3507¢	0.3507¢	

PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 9  
LARGE GENERAL SERVICE  
 (Continued)

FACILITIES BEYOND THE POINT OF DELIVERY

At the option of the Company, transformers and other facilities installed beyond the Point of Delivery to provide Primary or Transmission Service may be owned, operated, and maintained by the Company in consideration of the Customer paying a Facilities Charge to the Company.

Company-owned Facilities Beyond the Point of Delivery will be set forth in a Distribution Facilities Investment Report provided to the Customer. As the company's investment in Facilities Beyond the Point of Delivery changes in order to provide the Customer's service requirements, the Company shall notify the Customer of the additions and/or deletions of facilities by forwarding to the Customer a revised Distribution Facilities Investment Report.

In the event the Customer requests the Company to remove or reinstall or change Company-owned Facilities Beyond the Point of Delivery, the Customer shall pay to the Company the "non-salvable cost" of such removal, reinstallation or change. Non-salvable cost as used herein is comprised of the total depreciated costs of materials, labor and overheads of the facilities, less the difference between the salvable cost of material removed and removal labor cost including appropriate overhead costs.

POWER FACTOR ADJUSTMENT

(N)

Where the Customer's Power Factor is less than 90 percent, as determined by measurement under actual load conditions, the Company may adjust the kW measured to determine the Billing Demand by multiplying the measured kW by 90 percent and dividing by the actual Power Factor.

SUMMER AND NON-SUMMER SEASONS

The summer season begins on June 1 of each year and ends on August 31 of each year. The non-summer season begins on September 1 of each year and ends on May 31 of each year.

TIME PERIODS

The time periods are defined as follows. All times are stated in Mountain Time.

Summer Season

On-Peak	1:00 p.m. to 9:00 p.m. Monday through Friday, except holidays
Mid-Peak	7:00 a.m. to 1:00 p.m. and 9:00 p.m. to 11:00 p.m. Monday through Friday, except holidays, and 7:00 a.m. to 11:00 p.m. Saturday and Sunday, except holidays
Off-Peak	11:00 p.m. to 7:00 a.m. Monday through Sunday and all hours on holidays

Non-Summer Season

Mid-Peak	7:00 a.m. to 11:00 p.m., Monday through Saturday, except holidays
Off-Peak	11:00 p.m. to 7:00 a.m. Monday through Saturday and all hours on Sunday and holidays

The holidays observed by the Company are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day and Christmas Day. When New Year's Day, Independence Day, or Christmas Day falls on a Sunday, the Monday immediately following that Sunday will be considered a holiday.

SCHEDULE 9  
LARGE GENERAL SERVICE  
 (Continued)

MONTHLY CHARGE

The Monthly Charge is the sum of the Service Charge, the Energy Charge, and the Power Supply Adjustment at the following rates, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), Schedule 95 (Adjustment for Municipal Exactions), and Schedule 98 (Residential and Small Farm Energy Credit).

<u>SECONDARY SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month			
Single Phase Service	\$ 11.00	\$ 11.00	(I)
Three Phase Service	\$ 19.00	\$ 19.00	(I)
Basic Charge, per kW of			
Basic Load Capacity	\$ 0.75	\$ 0.75	(I)
Demand Charge, per kW of			
Billing Demand	\$ 6.03	\$ 4.53	(I)
Energy Charge, per kWh	5.0845¢	4.6658¢	(I)
Power Supply Adjustment, per kWh	0.3507¢	0.3507¢	
<u>Facilities Charge</u>			
None			
<u>PRIMARY SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month	\$207.00	\$207.00	(I)
Basic Charge, per kW of			
Basic Load Capacity	\$ 1.17	\$ 1.17	(I)
Demand Charge, per kW of			
Billing Demand	\$ 5.61	\$ 4.58	(I)
On-Peak Demand Charge, per kW of			
On-Peak Billing Demand	\$ 0.82	n/a	(I)
Energy Charge, per kWh			
On-Peak	4.6211¢	n/a	(I)
Mid-Peak	4.3226¢	3.9061¢	(I)
Off-Peak	4.1279¢	3.7814¢	(I)
Power Supply Adjustment	0.3507¢	0.3507¢	
<u>Facilities Charge</u>			
The Company's investment in Company-owned Facilities Beyond the Point of Delivery times 1.41 percent.			(R)

SCHEDULE 9  
LARGE GENERAL SERVICE  
 (Continued)

MONTHLY CHARGE (Continued)

<u>TRANSMISSION SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month	\$200.00	\$200.00	
Basic Charge, per kW of Basic Load Capacity	\$ 0.30	\$ 0.30	
Demand Charge, per kW of Billing Demand	\$ 3.59	\$ 3.84	
On-Peak Demand Charge, per kW of On-Peak Billing Demand	\$ 0.69	n/a	
Energy Charge, per kWh			
On-Peak	4.2176¢	n/a	(I)
Mid-Peak	3.9483¢	3.5631¢	(I)
Off-Peak	3.7722¢	3.4507¢	(I)
Power Supply Adjustment	0.3507¢	0.3507¢	

Facilities Charge

The Company's investment in Company-owned Facilities Beyond the Point of Delivery times 1.41 percent. (R)

PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 15  
DUSK TO DAWN CUSTOMER LIGHTING  
 (Continued)

MONTHLY CHARGE

The Monthly Charge is the sum of the per Unit Charge and the Power Supply Adjustment at the following charges, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

1. Monthly Per Unit Charge on existing facilities:

AREA LIGHTING

<u>High Pressure Sodium Vapor</u>	<u>Average Lumens</u>	<u>Monthly Base Rate</u>	<u>Power Supply Adjustment</u>	
100 Watt	8,550	\$ 10.37	\$ 0.14	(I)
200 Watt	19,800	\$ 12.40	\$ 0.26	(R)
400 Watt	45,000	\$ 16.96	\$ 0.55	(R)

FLOOD LIGHTING

<u>High Pressure Sodium Vapor</u>	<u>Average Lumens</u>	<u>Monthly Base Rate</u>	<u>Power Supply Adjustment</u>	
200 Watt	19,800	\$ 15.00	\$ 0.26	(R)
400 Watt	45,000	\$ 17.77	\$ 0.55	(R)
 <u>Metal Halide</u>				
400 Watt	28,800	\$ 16.26	\$ 0.54	(R)
1,000 Watt	88,000	\$ 26.07	\$ 1.27	(R)

2. For New Facilities Installed Before August 8, 2005. The Monthly Charge for New Facilities installed, prior to August 8, 2005 such as overhead secondary conductor, poles, anchors, etc., shall be 1.51 percent of the estimated installed cost thereof. (R)

3. For New Facilities Installed On or After August 8, 2005. The non-refundable charge for New Facilities to be installed, such as underground service, overhead secondary conductor, poles, anchors, etc., shall be equal to the work order cost.

PAYMENT

The monthly bill for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.



SCHEDULE 19  
LARGE POWER SERVICE  
 (Continued)

POWER FACTOR ADJUSTMENT

Where the Customer's Power Factor is less than 90 percent, as determined by measurement under actual load conditions, the Company may adjust the kW measured to determine the Billing Demand by multiplying the measured kW by 90 percent and dividing by the actual Power Factor.

TEMPORARY SUSPENSION

When a Customer has properly invoked Rule G, Temporary Suspension of Demand, the Basic Load Capacity, the Billing Demand, and the On-Peak Billing Demand shall be prorated based on the period of such suspension in accordance with Rule G. In the event the Customer's metered demand is less than 1,000 kW during the period of such suspension, the Basic Load Capacity and Billing Demand will be set equal to 1,000 kW for purposes of determining the Customer's monthly Minimum Charge.

MONTHLY CHARGE

The Monthly Charge is the sum of the Service Charge, the Energy Charge, and the Power Supply Adjustment at the following rates, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), Schedule 95 (Adjustment for Municipal Exactions), and Schedule 98 (Residential and Small Farm Energy Credit).

<u>SECONDARY SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month	\$222.00	\$222.00	(I)
Basic Charge, per kW of Basic Load Capacity	\$ 0.56	\$ 0.56	(I)
Demand Charge, per kW of Billing Demand	\$ 4.68	\$ 4.58	(I)
On-Peak Demand Charge, per kW of On-Peak Billing Demand	\$ 0.77	n/a	(I)
Energy Charge, per kWh			
On-Peak	5.6689¢	n/a	(I)
Mid-Peak	4.4634¢	4.2133¢	(I)
Off-Peak	3.9425¢	3.8114¢	(I)
Power Supply Adjustment*, per kWh	0.3507¢	0.3507¢	

\*Note: A Customer who prepays the Power Supply Adjustment amount pursuant to ORS 757.259(11) shall not be subject to the Power Supply Adjustment rates.

Facilities Charge

None

SCHEDULE 19  
LARGE POWER SERVICE  
 (Continued)

MONTHLY CHARGE (Continued)

<u>PRIMARY SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>
Service Charge, per month	\$200.00	\$200.00
Basic Charge, per kW of Basic Load Capacity	\$ 0.97	\$ 0.97
Demand Charge, per kW of Billing Demand	\$ 4.70	\$ 4.35
On-Peak Demand Charge, per kW of On-Peak Billing Demand	\$ 0.69	n/a
Energy Charge, per kWh		
On-Peak	4.7848¢	n/a
Mid-Peak	3.7752¢	3.5658¢
Off-Peak	3.3390¢	3.2292¢
Power Supply Adjustment*, per kWh	0.3507¢	0.3507¢

\*Note: A Customer who prepays the Power Supply Adjustment amount pursuant to ORS 757.259(11) shall not be subject to the Power Supply Adjustment rates.

Facilities Charge

The Company's investment in Company-owned Facilities Beyond the Point of Delivery times 1.41 (R) percent.

SCHEDULE 19  
LARGE POWER SERVICE  
 (Continued)

MONTHLY CHARGE (Continued)

<u>TRANSMISSION SERVICE</u>	<u>Summer</u>	<u>Non-Summer</u>	
Service Charge, per month	\$237.00	\$237.00	(I)
Basic Charge, per kW of Basic Load Capacity	\$ 0.34	\$ 0.34	(I)
Demand Charge, per kW of Billing Demand	\$ 4.98	\$ 4.71	(I)
On-Peak Demand Charge, per kW of On-Peak Demand	\$ 0.96	n/a	(I)
Energy Charge, per kWh			
On-Peak	5.0816¢	n/a	(I)
Mid-Peak	4.0434¢	3.8230¢	(I)
Off-Peak	3.5925¢	3.4760¢	(I)
Power Supply Adjustment*, per kWh	0.3507¢	0.3507¢	

\*Note: A Customer who prepays the Power Supply Adjustment amount pursuant to ORS 757.259(11) shall not be subject to the Power Supply Adjustment rates.

Facilities Charge

The Company's investment in Company-owned Facilities Beyond the Point of Delivery times 1.41 percent. (R)

PAYMENT

The monthly bill for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 24  
AGRICULTURAL IRRIGATION SERVICE  
 (Continued)

MONTHLY CHARGE

The Monthly Charge is the sum of the following charges, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), Schedule 95 (Adjustment for Municipal Exactions), and Schedule 98 (Residential and Small Farm Energy Credit).

<u>SECONDARY SERVICE</u>	<u>In-Season</u>	<u>Out-of-Season</u>	
Service Charge, per month	\$ 22.00	\$ 3.50	(I)
Demand Charge, per kW of Billing Demand	\$ 9.00	\$ 0.00	(I)
Energy Charge, per kWh			
In Season			
First 164 kWh per kW of Demand	7.2459¢	n/a	(I)
All Other kWh	6.8358¢	n/a	(I)
Out-of-Season			
All kWh	n/a	7.6079¢	(I)
Power Supply Adjustment, per kWh	0.3507¢	0.3507¢	
<u>Facilities Charge</u>			
None			
<u>TRANSMISSION SERVICE</u>	<u>In-Season</u>	<u>Out-of-Season</u>	
Service Charge, per month	\$188.00	\$ 3.50	(I)
Demand Charge, per kW of Billing Demand	\$ 8.48	\$ 0.00	(I)
Energy Charge, per kWh			
In Season			
First 164 kWh per kW of Demand	7.0157¢	n/a	(I)
All Other kWh	6.6200¢	n/a	(I)
Out-of-Season			
All kWh	n/a	7.3629¢	(I)
Power Supply Adjustment, per kWh	0.3507¢	0.3507¢	

Facilities Charge

The Company's investment in Company-owned Facilities Beyond the Point of Delivery times 1.41 percent.

SCHEDULE 40  
NONMETERED GENERAL SERVICE

(T)

AVAILABILITY

Service under this schedule is available at points on the Company's interconnected system within the State of Oregon where existing secondary distribution facilities of adequate capacity, phase and voltage are available adjacent to the Customer's Premises and the only investment required by the Company is an overhead service drop.

APPLICABILITY

Service under this schedule applies to Electric Service for the Customer's single- or multiple-unit loads up to 1,800 watts per unit where the size of the load and period of operation are fixed and, as a result, actual usage can be accurately determined. Service may include, but is not limited to, security lighting, telephone booths and CATV power supplies which serve line amplifiers. Equipment or loads constructed or operated in such a way as to allow for the potential or actual variation in energy use are not eligible for service under this schedule. Facilities to supply service under this schedule shall be installed so that service cannot be extended to the Customer's loads served under other schedules. Service under this schedule is not applicable to shared or temporary service, or to the Customer's loads on Premises which have metered service.

(D)

SPECIAL TERMS AND CONDITIONS

The Customer shall pay for all Company investment, except the overhead service drop, required to provide service requested by the Customer. The Customer is responsible for installing, owning and maintaining all equipment, including necessary underground circuitry and related facilities to connect with the Company's facilities at the Company designated Point of Delivery. If the Customer's equipment is not properly maintained, service to the specific equipment will be terminated.

Energy used by CATV power supplies which serve line amplifiers will be determined by the power supply manufacturer's nameplate input rating assuming continuous operation.

The Customer is responsible for notifying the Company of any changes or additions to the equipment or loads being served under this schedule. Failure to notify the Company of such changes or additions will result in the termination of service under this schedule and the requirement that service be provided under one of the Company's metered service schedules.

If the Customer modifies existing equipment being served under this schedule in a way that allows for the potential or actual variation in energy usage or installs additional equipment that allows for the potential or actual variation in energy usage, service under this schedule will be terminated and the Customer will be required to receive service under one of the Company's metered service schedules.

With Company approval, municipalities or agencies of federal, state, or county governments may install equipment that allows for the potential intermittent variation in energy usage at authorized Points of Delivery. Under these circumstances, the Customer's bill will include fixed units of the Intermittent Usage Charge in addition to the Customer's other Monthly Charges.

The Company is only responsible for supplying energy to the Point of Delivery and, at its expense, may check energy consumption at any time.

SCHEDULE 40  
UNMETERED GENERAL SERVICE  
(Continued)

MONTHLY CHARGE

The average monthly kWh of energy usage shall be estimated by the Company, based on the Customer's electric equipment and one-twelfth of the annual hours of operation thereof. Since the service provided is nonmetered, failure of the Customer's equipment will not be reason for a reduction in the Monthly Charge. The Monthly Charge shall be computed at the following rate and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions). (T)

Energy Charge, per kWh	8.774¢	(I)
Power Supply Adjustment, per kWh	0.3507¢	
Minimum Charge, per month	\$ 1.50	

ADDITIONAL CHARGES

Applicable only to municipalities or agencies of federal, state, or county governments with an authorized Point of Delivery having the potential of intermittent variations in energy usage.

Intermittent Usage Charge, per unit, per month	\$ 1.00
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PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

SCHEDULE 41  
STREET LIGHTING SERVICE

AVAILABILITY

Service under this schedule is available throughout the Company's service area within the State of Oregon where street lighting wires and fixtures can be installed on Customer-provided street lighting facilities or installed on the Company's existing distribution facilities. (N)

APPLICABILITY

Service under this schedule is applicable to service requested or installed by Customers for the lighting of public streets, public alleys, public grounds, and thoroughfares. Street lighting lamps will be energized each night from dusk until dawn. (C)  
(C)

SERVICE LOCATION AND PERIOD

Street lighting facility locations, type of unit and lamp sizes, as changed from time to time by written request of the Customer and agreed to by the Company, shall be provided for Customers receiving service under Options A and B of this schedule. The in-service date for each street lighting facility shall also be maintained. (N)  
(N)

The minimum service period for any Company-owned street lighting facility is 10 years. The Company, upon written notification from the Customer, will remove a Company-owned street lighting facility: (N)  
(N)

1. At no cost to the Customer, if such facility has been in service for no less than the minimum service period. The Company will not grant a request from the Customer for reinstallation of street lighting service at the same location for a minimum period of two years from the date of removal. (N)
2. Upon payment to the Company of the removal cost, if such facility has been in service for less than the minimum service period.

SERVICE OPTIONS

"A" - Idaho Power-Owned, Idaho Power-Maintained System (C)

The facilities required for supplying service, including fixture, lamp, control relay, mast arm for mounting on an existing utility pole, and energy for the operation thereof, are supplied, installed, owned and maintained by the Company. All necessary repairs and maintenance work, including group lamp replacement and glassware cleaning, will be performed by the Company during the regularly scheduled working hours of the Company on the Company's schedule. Individual lamps will be replaced on burnout as soon as reasonably possible after notification by the Customer and subject to the Company's operating schedules and requirements.

The Company has two standard street lighting fixture options, drop-glass or cut-off (shielded lighting). For each initial lighting fixture installation, the Customer is required to state, in writing, a fixture preference. A maintenance-related replacement of a current fixture will be made with a similar type of drop-glass or cut-off fixture as the one being replaced unless written notification has been received from the Customer requesting a change in fixture types.

SCHEDULE 41  
STREET LIGHTING SERVICE  
(Continued)

SERVICE OPTIONS (Continued)

"A" - Idaho Power-Owned, Idaho Power-Maintained System (Continued)

Accelerated Replacement of Existing Fixtures

In the event a Customer requests the Company perform an accelerated replacement of existing fixtures with the cut-off fixture, the following charges will apply:

1. The designed cost estimate which includes labor, time, and mileage costs for the removal of the existing street lighting fixtures.
2. \$132.00 per fixture removed from service. (I)

The total charges identified in 1 and 2 above must be paid prior to the beginning of the fixture replacement and are non-refundable. The accelerated replacement will be performed by the Company during the regularly scheduled working hours of the Company and on the Company's schedule.

Monthly Charges

The Monthly Charges are as follows, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

Lamp Charges, per lamp (41A)

Standard High Pressure <u>Sodium Vapor</u>	Average <u>Lumens</u>	Monthly <u>Base Rate</u>	Power Supply <u>Adjustment</u>	
70 Watt	5,540	\$ 9.83	\$ 0.10	(N)
100 Watt	8,550	\$ 8.50	\$ 0.14	(R)
200 Watt	19,800	\$ 11.47	\$ 0.26	(I)
250 Watt	24,750	\$ 12.53	\$ 0.35	
400 Watt	45,000	\$ 14.33	\$ 0.55	(I)

Pole Charges

For Company-owned poles required to be used for street lighting only:

- Wood pole \$ 1.90 per pole
- Steel pole \$ 7.39 per pole

Facilities Charge

Customers assessed a monthly facilities charge prior to August 8, 2005 for the installation of underground circuits will continue to be assessed a monthly facilities charge equal to 1.21 percent of the estimated cost difference between overhead and underground circuits. (R)



SCHEDULE 41  
STREET LIGHTING SERVICE  
 (Continued)

SERVICE OPTIONS(Continued)

"A" - Idaho Power-Owned, Idaho Power-Maintained System (Continued)

Monthly Charges (Continued)

Payment

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

(N)

(N)

(N)

"B" - Customer-Owned, Idaho Power-Maintained System – No New Service

(N)

The Customer's lighting system, including posts or standards, fixtures, initial installation of lamps and underground cables with suitable terminals for connection to the Company's distribution system, is installed and owned by the Customer and maintained by Idaho Power. Customer-owned lighting systems receiving maintenance under Option B must have Idaho Power standard wattage high pressure sodium vapor lamps installed in all street lighting fixtures.

(N)

(N)

(N)

Customer-owned systems constructed, operated, or modified in such a way as to allow for the potential or actual variation in energy usage, such as through, but not limited to, the use of wired outlets or useable plug-ins, are required to be metered in order to record actual energy usage.

Energy and Maintenance Service

Energy and Maintenance Service includes operation of the system, energy, lamp renewals, cleaning of glassware, and replacement of defective photocells which are standard to the Company-owned street light units. Service does not include the labor or material cost of replacing cables, standards, broken glassware or fixtures, painting, or refinishing of metal poles. Individual lamps will be replaced on burnout as soon as reasonably possible after notification by the Customer and subject to the Company's operating schedules and requirements.

(D)

Monthly Charges

The Monthly Charges are as follows, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

Non-Metered Service, per lamp (41B)

(C)

<u>Standard High Pressure Sodium Vapor Energy and Maintenance Charges</u>	<u>Average Lumens</u>	<u>Monthly Base Rate</u>	<u>Power Supply Adjustment</u>
70 Watt	5,540	\$ 2.42	\$ 0.10
100 Watt	8,550	\$ 2.47	\$ 0.14
200 Watt	19,800	\$ 3.71	\$ 0.26
250 Watt	24,750	\$ 4.65	\$ 0.35
400 Watt	45,000	\$ 6.70	\$ 0.55

(N)

(N)

(R)

(R)

SCHEDULE 41  
STREET LIGHTING SERVICE  
(Continued)

(D)

Payment

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

"C" - Customer-Owned, Customer-Maintained System

(N)

The Customer's lighting system, including posts or standards, fixtures, initial installation of lamps and underground cables with suitable terminals for connection to the Company's distribution system, is installed, owned, and maintained by the Customer. The Customer is responsible for notifying the Company of any changes or additions to the lighting equipment or loads being served under Option C – Non-Metered Service. Failure to notify the Company of such changes or additions will result in the termination of non-metered service under Option C and the requirement that service be provided under Option C - Metered Service.

All new Customer-owned lighting systems installed outside of Subdivisions on or after January 1, 2012 are required to be metered in order to record actual energy usage.

Customer-owned systems installed prior to June 1, 2004 that are constructed, operated, or modified in such a way as to allow for the potential or actual variation in energy usage may have the estimated annual variations in energy usage charged the Non-Metered Service - Energy Charge until the street lighting system is converted to Metered Service, or until the potential for variations in energy usage has been eliminated, whichever is sooner.

Monthly Charges

The monthly charges are as follows, and may also include charges as set forth in Schedule 55 (Power Cost Adjustment), Schedule 91 (Energy Efficiency Rider), and Schedule 95 (Adjustment for Municipal Franchise Fees). For non-metered service, the average monthly kWh of energy usage shall be estimated by the Company based on the total wattage of the Customer's lighting system and 4,059 hours of operation.

Non-Metered Service (41C)

Energy Charge, per kWh 3.5865¢

Metered Service (41CM)

Service Charge, per meter \$2.90  
Energy Charge, per kWh 3.5865¢

(N)

SCHEDULE 42  
TRAFFIC CONTROL SIGNAL  
LIGHTING SERVICE

APPLICABILITY

Service under this schedule is applicable to Electric Service required for the operation of traffic control signal lights within the State of Oregon. Traffic control signal lamps are mounted on posts or standards by means of brackets, mast arms, or cable.

CHARACTER OF SERVICE

The traffic control signal fixtures, including posts or standards, brackets, mast arm, cable, lamps, control mechanisms, fixtures, service cable, and conduit to the point of, and with suitable terminals for, connection to the Company's underground or overhead distribution system, are installed, owned, maintained and operated by the Customer. Service is limited to the supply of energy only for the operation of traffic control signal lights.

The installation of a meter to record actual energy consumption is required for all new traffic control signal lighting systems installed on or after August 8, 2005. For traffic control signal lighting systems installed prior to August 8, 2005 a meter may be installed to record actual usage upon the mutual consent of the Customer and the Company.

MONTHLY CHARGE

The monthly kWh of energy usage shall be either the amount estimated by the Company based on the number and size of lamps burning simultaneously in each signal and the average number of hours per day the signal is operated, or the actual meter reading as applicable. The Monthly Charge shall be computed at the following rate, and may also include charges as set forth in Schedule 55 (Annual Power Cost Update), Schedule 56 (Power Cost Adjustment Mechanism), Schedule 91 (Energy Efficiency Rider), Schedule 93 (Solar Photovoltaic Pilot Program Rider), and Schedule 95 (Adjustment for Municipal Exactions).

Energy Charge, per kWh	9.750¢
Power Supply Adjustment, per kWh	0.3507¢

(1)

PAYMENT

The monthly bill rendered for service supplied hereunder is payable upon receipt, and becomes past due 15 days from the date on which rendered.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**GREGORY W. SAID**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Gregory W. Said and my business address is 1221 West Idaho Street,  
3 Boise, Idaho.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company (“Idaho Power” or “Company”) as the Vice  
6 President of Regulatory Affairs.

7 **Q. Please describe your educational background and business affiliations.**

8 A. In May of 1975, I received a Bachelor of Science Degree in Mathematics with honors  
9 from Boise State University. In 1999, I attended the Public Utility Executives Course  
10 at the University of Idaho and am now on the faculty of that program covering  
11 “Regulation and Ratemaking.” I have attended numerous additional educational  
12 conferences throughout my career at Idaho Power and am an active member of the  
13 Edison Electric Institute’s Rates and Regulatory Affairs Committee.

14 **Q. Please describe your work experience with Idaho Power.**

15 A. I was hired by Idaho Power in 1980 as an analyst in the Resource Planning  
16 Department. In 1985, the Company applied for a general revenue requirement  
17 increase. I was the Company witness addressing power supply expenses.

18 In August of 1989, after nine years in the Resource Planning Department, I  
19 was offered and I accepted a position in the Company’s Rate Department. With the  
20 Company’s application for a temporary rate increase in 1992, my responsibilities as a  
21 witness were expanded. While I continued to be the Company witness concerning  
22 power supply expenses, I also sponsored the Company’s rate computations and  
23 proposed tariff schedules in that case.

24 Because of my combined Resource Planning and Rate Department  
25 experience, I was asked to design a Power Cost Adjustment (“PCA”) which would  
26 impact customers’ rates based upon changes in the Company’s net power supply

1 expenses. I presented my recommendations to the Idaho Public Utilities  
2 Commission in 1992, at which time the Idaho Public Utilities Commission established  
3 the PCA as an annual adjustment to the Company's rates. The Company now has a  
4 power cost adjustment mechanism in Oregon as well, which resulted from years of  
5 discussion with Oregon Staff and the parties prior to the Public Utility Commission of  
6 Oregon's ("Commission") approval. I was involved in those discussions.

7 In 1996, I was promoted to Director of Revenue Requirement. I managed the  
8 preparation of revenue requirement information for regulatory proceedings until  
9 2008.

10 In 2008, I was promoted to Director of State Regulation, overseeing the  
11 management of both cost-of-service and rate design.

12 In 2010, I was promoted to General Manager of the Regulatory Affairs  
13 Department and, in 2011, I was promoted to Vice President of Regulatory Affairs.

14 As the Vice President of Regulatory Affairs, I oversee and direct the activities  
15 of the Regulatory Affairs Department. These activities include the development of  
16 jurisdictional revenue requirements, the oversight of the Company's rate adjustment  
17 mechanisms, the preparation of cost-of-service studies, the preparation of rate  
18 design analyses, and the administration of tariffs and customer contracts. I also  
19 have the primary responsibility for corporate policy regarding matters related to the  
20 economic regulation of Idaho Power. I have submitted testimony to the Commission  
21 on numerous occasions.

22 **Q. What is the purpose of your testimony in this matter?**

23 A. First and foremost, the purpose of my testimony is to present the Company's request  
24 that the Commission grant Idaho Power a 5.8 million increase to Oregon  
25 jurisdictional revenues, which is 14.6 percent greater than the revenues that could be  
26 generated under current rates.

1 As the Vice President of Regulatory Affairs, I am responsible for the overall  
2 preparation and presentation of this filing. I will provide an overview of the  
3 Company's case and summarize what I consider to be the major points contained in  
4 the testimony of the various Company witnesses.

5 **I. BACKGROUND**

6 **Q. When did the Company last receive general rate relief in Oregon?**

7 A. The Company received a 15.4 percent general rate increase on March 1, 2010. The  
8 increase was approved by the Commission based upon settlement by the parties in  
9 Docket No. UE 213; it reflected a 2009 test year with a 10.175 percent return on  
10 equity.

11 **Q. What test year is the Company proposing in this case?**

12 A. The Company is proposing a 2011 test year ("2011 Test Year", or "Test Year.").  
13 Consistent with the Company's test year approach in its last general rate case, UE  
14 213, the Company is recommending a test year that is in progress at the time of  
15 filing, but will have ended prior to the time that new rates take effect in January 2012.  
16 Because the actual test year information is not known at the time of case  
17 preparation, the Company makes adjustments to 2010 actual data in order to reflect  
18 ratebase, revenues and expenses for the Test Year.

19 **Q. What return on equity does the Company propose be approved by the  
20 Commission in this case?**

21 A. The Company recommends that the Commission approve a 10.5 percent return on  
22 equity for Idaho Power in this case.

23 **II. CASE STRUCTURE AND WITNESS SUMMARY**

24 **Q. Please provide a summary of the financial factors driving the need for rate  
25 relief as detailed in the testimony of Mr. Darrel Anderson, Executive Vice  
26 President of Administration and Chief Financial Officer.**

1 A. Mr. Anderson discusses numerous financial challenges facing the Company, such as  
2 a down economy coupled with rising costs and constrained capacity issues. He  
3 describes the Company's increased investment in generation plant, transmission  
4 facilities, distribution facilities, and general plant that has been required to provide for  
5 the needs of the Company's customers. He describes how reliability requirements,  
6 compliance requirements, and the costs of materials and supplies have impacted the  
7 level of investment.

8 Mr. Anderson also addresses the actions taken by the Company to manage  
9 ongoing expenses. Specifically, he points out that over the last two years of the  
10 down economy, the Company has provided for general wage adjustments that are  
11 below peer group adjustments to salary structures. While the Company does not  
12 fear losing employees in the short-term, in the longer term, the Company will need to  
13 return to its strategy of setting and maintaining a salary structure that allows  
14 employees the opportunity to receive the median level compensation for like jobs at  
15 other companies.

16 **Q. Does Mr. Anderson discuss the Company's opportunity to earn its authorized**  
17 **rate of return given the additional investments and ongoing expenses of the**  
18 **Company?**

19 A. Yes. Mr. Anderson notes that the Company has not earned its authorized rate of  
20 return in any of the last five years and does not expect to earn its authorized rate of  
21 return in 2011 --absent a positive determination from the Internal Revenue Service  
22 related to the Company's request to change tax methods related to uniform  
23 capitalization for income taxes.

24 **Q. Given the Company's need for rate relief as described by Mr. Anderson, did he**  
25 **give you any specific instructions with regard to preparation of this case?**

26



1 A. Yes. While Mr. Anderson is fully aware that the Company has not earned its  
2 authorized rate of return in any of the last five years, he is also cognizant of the  
3 prolonged economic downturn. As a result, Mr. Anderson instructed me to identify  
4 areas where the Company could forego requesting an increase at this time and keep  
5 the Company's requested rate increase as small as possible. Toward that end, I  
6 recommended to Mr. Anderson that the Company (a) request operation and  
7 maintenance expenses equal to 2010 levels with the exception of specific cost  
8 categories that are "known" to be materially different in 2011; and (b) forego  
9 requesting incremental power supply expenses as part of this filing.

10 **Q. Please provide your rationale for this recommendation.**

11 A. Idaho Power recognizes the importance of managing its costs at all times, especially  
12 during difficult economic times. By limiting the Company's current request to 2010  
13 expense levels with only known material changes, the Company is demonstrating its  
14 commitment to manage expenses. With regard to incremental power supply  
15 expenses, the Commission has recently approved the Company's annual power cost  
16 adjustment ("APCU") rate change request, UE 222, Order No. 11-178, and the  
17 Company will file for new APCU rates before rates from this case are likely to be  
18 determined. New rates should be in effect simultaneously with the filing of this case  
19 and reflect then current power expense levels. Any changes in power supply  
20 expenses that occur next year will, to a large extent, be reflected at mid-year 2012,  
21 at the time of the next APCU rate change. Depending on a number of factors, that  
22 APCU rate can either go up or down.

23 **Q. Please summarize the purpose of Mr. Warren Kline's testimony in this case.**

24 A. Mr. Kline is the Company's Vice President of Customer Operations. Mr. Kline  
25 describes the Company's efforts to manage costs in order to benefit customers.  
26

1           Specifically, Mr. Kline discusses changes to the Company's Customer  
2 Service Operations organization that result in exemplary customer service. For  
3 example, he describes how Mobile Workforce Management has been utilized to  
4 optimize daily field processes.

5           Mr. Kline goes on to describe the nearing completion of meter replacement  
6 with Advanced Metering Infrastructure ("AMI") throughout the Company's system.  
7 Meter replacement in the Oregon jurisdiction was completed in 2010. Mr. Kline  
8 describes how the Company was able to leverage its meter change-outs to receive a  
9 Smart Grid Investment Grant from the U.S. Department of Energy, which will provide  
10 for up to \$47 million of infrastructure that will be treated as a Contribution in Aid of  
11 Construction benefitting customers.

12           Mr. Kline also describes the Company's ongoing efforts to pursue all cost-  
13 effective energy efficiency.

14           Finally, Mr. Kline explains how all of the efforts he has discussed have been  
15 reflected in customer satisfaction measurements. In particular, Mr. Kline explains  
16 that customer satisfaction is significantly higher than when the Company began such  
17 measurements in 1995 and that the Company has had consistently high  
18 performance in recent years.

19 **Q. Did the Company hire an outside consultant to evaluate and determine an**  
20 **appropriate acceptable range in which the Company's authorized rate of return**  
21 **on equity ("ROE") should be set?**

22 **A.** Yes. Dr. William E. Avera has been the Company's consultant on this issue for  
23 many years.

24 **Q. What does Dr. Avera recommend as the range in which Idaho Power's**  
25 **authorized ROE should be set?**

26

1 A. Dr. Avera provides detailed testimony regarding his analyses of Idaho Power and the  
2 utility industry in general. He describes his capital market estimates based upon  
3 methods such as discounted cash flow analyses, capital asset pricing models, and  
4 comparable earnings methodologies. He also discusses flotation costs. Given the  
5 full body of his analyses, Dr. Avera recommends a fair rate of return on equity range  
6 of 10.40 to 11.55 percent.

7 **Q. Please describe how Mr. Steven R. Keen, Vice President, Finance and**  
8 **Treasurer, used Dr. Avera's recommended fair rate of return on equity range to**  
9 **arrive at the point estimate for ROE that the Company recommends be**  
10 **approved as the authorized rate of return on equity in this case.**

11 A. Mr. Keen presents the Company request that the Commission authorize an ROE of  
12 10.5 percent for the purposes of determining the Company's jurisdictional revenue  
13 requirement in this case. This requested ROE is near the bottom of Dr. Avera's  
14 recommended range. It is above the currently authorized rate of return on equity in  
15 Oregon, but equal to the currently authorized rate of return on equity in Idaho  
16 Power's Idaho jurisdiction.

17 In arriving at his point estimate, Mr. Keen discusses the need for an ROE that  
18 is adequate to attract capital in today's financial markets. He discusses the following  
19 risk factors facing the Company that have been identified by those markets:

- 20 1. Declining credit ratings;
  - 21 2. Actual results compared to authorized ROE;
  - 22 3. Power cost volatility;
  - 23 4. Hells Canyon relicensing;
  - 24 5. Impacts of purchases of energy from Qualifying Facilities; and
  - 25 6. Required reliability investments.
- 26

1 **Q. Does Mr. Keen propose a cost of debt to be used in determining the**  
2 **Company's Idaho jurisdictional revenue requirement?**

3 A. Yes. Mr. Keen recommends a cost of debt of 5.728 percent.

4 **Q. What is the overall cost of capital as quantified by Mr. Keen, incorporating the**  
5 **recommended 10.5 percent ROE and 5.728 percent cost of debt?**

6 A. Mr. Keen has quantified the overall cost of capital to be 8.17 percent.

7 **Q. Who is the next witness in the Company's presentation of its case in this**  
8 **proceeding?**

9 A. Following Mr. Keen in the presentation of the Company's case is Mr. Douglas N.  
10 Jones, Regulatory Accounting and Support Team Leader. Mr. Jones presents actual  
11 2010 financial data as reported to the Securities and Exchange Commission in the  
12 Company's Form 10-K and to the Federal Energy Regulatory Commission ("FERC")  
13 in the Company's FERC Form 1. This data serves as the auditable starting point for  
14 development of the 2011 Test Year.

15 **Q. Does Mr. Jones perform another function in the preparation of the Company's**  
16 **case?**

17 A. Yes. In addition to providing the Company's actual financial data for the 2010  
18 auditable starting point, Mr. Jones quantifies the adjustments to that financial data  
19 that reflect previous Oregon and Idaho Commission directives regarding regulatory  
20 treatment of specific accounts.

21 **Q. Please describe the Company's quantification of 2011 normalized power**  
22 **supply expenses.**

23 A. Mr. Timothy E. Tatum, Senior Manager of Cost of Service, requested that Mr. Scott  
24 Wright, Regulatory Analyst II, quantify 2011 normalized power supply expenses  
25 using the AURORA model that has been routinely utilized for ratemaking  
26 determination by this Commission for a number of years.

1           Mr. Wright has quantified 2011 Test Year normalized net power supply  
2 expenses to be \$267.5 million.

3 **Q. How does this number compare to the currently authorized total power supply**  
4 **expense?**

5 A. Mr. Wright's quantification of total normalized 2011 power supply expenses at \$267.5  
6 million is \$20.0 million more than the currently authorized power supply expense  
7 level of \$247.5 million. As I previously stated, the Company is not requesting the  
8 estimated \$20.0 million increase in net power supply expenses in this case. Mr.  
9 Wright's testimony is informational and demonstrates the Company's desire to  
10 mitigate the size of its additional revenue request in this proceeding.

11 **Q. Please describe the instructions you gave to Mr. Tatum regarding preparation**  
12 **of the 2011 t=Test Year in this case.**

13 A. I instructed Mr. Tatum to prepare the 2011 Test Year based upon the 2010 actual  
14 financial data provided by Mr. Jones in a manner similar to that accepted by the  
15 Commission in UE 213. However, I instructed Mr. Tatum to deviate from that  
16 approach in specific areas.

17           I told Mr. Tatum to hold operations and maintenance ("O&M") expenses to  
18 2010 levels with the exception of specific cost categories that are "known" to be  
19 materially different in 2011. I told Mr. Tatum to hold normalized total power supply  
20 expenses and related APCU accounts to 2010 levels as approved in Commission  
21 Order No. 11-178. I have previously discussed the Company's rationale for such  
22 instructions.

23 **Q. Given your instructions to Mr. Tatum, please describe how Mr. Tatum's**  
24 **testimony fits into the Company's presentation of its case.**

25 A. Mr. Tatum describes how the Company utilized the 2010 financial data as presented  
26 by Mr. Jones as a starting point from which he made conservative adjustments to

1 derive similar data corresponding to the 2011 Test Year. Mr. Tatum prepared Exhibit  
2 802 that details the method and rationale for each adjustment he utilized in  
3 developing the 2011 Test Year data. Once he determined the 2011 Test Year  
4 system-level data, Mr. Tatum supervised the preparation of the jurisdictional  
5 separation study utilized to determine the Idaho jurisdictional revenue requirement.  
6 (Exhibit 905.)

7 **Q. Who is the Company witness that quantified the Oregon jurisdictional revenue**  
8 **requirement?**

9 A. Ms. Kelley Noe, Regulatory Analyst II, prepared the Oregon jurisdictional revenue  
10 requirement under the direction of Mr. Tatum. Ms. Noe describes her preparation of  
11 the jurisdictional separation study incorporating Mr. Keen's return recommendations  
12 and Mr. Tatum's recommended adjustments to the financial data presented by Mr.  
13 Jones. She then describes the methods by which each regulatory account is  
14 allocated to either the Oregon or Idaho jurisdiction. As noted in Mr. Tatum's  
15 testimony, the resulting Oregon jurisdictional revenue requirement as quantified by  
16 Ms. Noe is \$45.7 million and the current Oregon jurisdictional revenue deficiency  
17 also quantified by Ms. Noe is \$5.8 million.

18 **Q. Please describe the next area of presentation in the Company's case.**

19 A. Mr. Matthew T. Larkin, Regulatory Analyst I, describes the 2011 Retail Revenue  
20 Forecast provided to Ms. Noe for her determination of the Company's revenue  
21 deficiency. He also describes the Company's class cost-of-service model that is  
22 used in part to determine each customer class's responsibility for a portion of the  
23 total Oregon jurisdictional revenue requirement.

24 **Q. Is the Company proposing to establish rates for its Oregon jurisdictional**  
25 **customer classes that will move each customer class to its class cost-of-**  
26 **service?**

1 A. No. Mr. Larkin has prepared Exhibit 1007 that shows the percentage of rate change  
2 that would be required in order to move each customer class to its cost-of-service.  
3 After discussions with Mr. Larkin, Mr. Tatum, and Mr. Michael J. Youngblood,  
4 Manager of Rate Design, I instructed Mr. Larkin to provide the Rate Design Team  
5 with class revenue targets that would not decrease any customer class rate, would  
6 cap any customer class rate at two times the system average rate increase, and  
7 would reallocate any shortfall in revenue collection created by capping increases to  
8 classes receiving uncapped increases.

9 **Q. Please describe the testimony of Company witnesses Ms. Darlene Nemnich,**  
10 **Senior Regulatory Analyst, and Mr. Scott Sparks, Senior Regulatory Analyst.**

11 A. Ms. Nemnich describes the Company's rate design proposals for residential  
12 customers and Mr. Sparks describes the Company's rate design proposals for all  
13 other customer classes. Mr. Sparks also discusses proposed changes with regard to  
14 the Company's facilities charge computations.

15 **Q. What are the Company's overall objectives with regard to its rate design**  
16 **strategy?**

17 A. The Company's rate designs are developed to recover the revenue requirement  
18 targets provided by Mr. Larkin for each customer class. However, in doing so, the  
19 Company continues to maintain two primary objectives with regard to rate design:  
20 (1) to establish prices that primarily reflect the costs of the services provided and (2)  
21 to have cost-based rate proposals designed to align with and encourage energy  
22 efficiency.

23 **Q. Please describe your instructions to Ms. Nemnich and Mr. Sparks.**

24 A. I instructed Ms. Nemnich and Mr. Sparks to continue the Company practice of  
25 recommending moderate movement of billing determinant rate components toward  
26 cost-of-service levels. Further, I instructed Ms. Nemnich and Mr. Sparks to look for

1 opportunities to incorporate rate designs that will encourage customers to use  
2 energy more efficiently.

3 **III. CASE SUMMARY**

4 **Q. Please summarize the Company's requested rate relief in this case.**

5 A. Using 2011 test year financial information, the Company has determined its Oregon  
6 jurisdictional revenue requirement to be \$45.7 million, resulting in an annual revenue  
7 deficiency of \$5.8 million. An increase to annual Oregon jurisdictional revenues in  
8 the amount of \$5.8 million would result in an average increase to customer rates of  
9 14.7 percent. The presented case demonstrates that Idaho Power has been prudent  
10 in the management of its operations and finances and has diligently looked for  
11 opportunities to mitigate its requested rate increase where practicable. The  
12 Company believes that the requested rate relief would provide the minimum level of  
13 revenue needed to provide Idaho Power with a reasonable opportunity to earn the  
14 requested rate of return.

15 **Q. Please detail the specific approval the Company is requesting from the  
16 Commission.**

- 17 A. The Company requests specific Commission approval of the following:
- 18 1. A current Oregon jurisdictional revenue requirement of \$45.72 million,  
19 as quantified by Ms. Noe;
  - 20 2. An authorized ROE of 10.5 percent, as recommended by Mr. Keen;
  - 21 3. An authorized overall rate of return of 8.17 percent, as recommended  
22 by Mr. Keen;
  - 23 4. An overall increase in revenues of \$5.8 million to eliminate the current  
24 Oregon revenue deficiency, as quantified by Ms. Noe;
  - 25 5. Class revenue requirements, as determined by Mr. Larkin; and
  - 26 6. Rate designs as proposed by Ms. Nemnich and Mr. Sparks.



1           The Company believes that these determinations can reasonably be made  
2 based upon the full and detailed testimony provided by the Company in this case.

3 **Q. Is it your opinion that the granting of the requested rate relief proposed by the**  
4 **Company is in the public interest?**

5 A. Yes. The proposed rates are in the public interest because they will allow Idaho  
6 Power to continue providing safe, reliable service at reasonable rates while  
7 maintaining its financial health.

8 **Q. Does that conclude your testimony?**

9 A. Yes, it does.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**DARREL ANDERSON**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Darrel Anderson and my business address is 1221 West Idaho Street,  
3 Boise, Idaho.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company ("Idaho Power" or "Company") as the  
6 Executive Vice President of Administrative Services and Chief Financial Officer.

7 **Q. Please describe your educational background.**

8 A. In 1979, I graduated from Oregon State University with a Bachelor of Science  
9 Degree in Accounting and Finance. I am a licensed Certified Public Accountant in  
10 the state of Oregon (#4312 inactive). In 2005, I completed the Advanced  
11 Management Program at the Harvard Graduate School of Business.

12 **Q. Please describe your work experience prior to joining Idaho Power.**

13 A. Before joining Idaho Power in 1996, I was the Chief Financial Officer of Sisters of  
14 Saint Mary of Oregon. Prior to joining the Sisters of Saint Mary of Oregon, I was a  
15 senior manager of Audit Services for Deloitte & Touche and was a firm-designated  
16 specialist in electric and gas utility operations. I was employed at Deloitte & Touche  
17 from 1979 until 1995.

18 **Q. Please describe your work experience with Idaho Power and IDACORP, Inc.  
19 ("IDACORP").**

20 A. I joined Idaho Power in 1996 as a Controller in the Finance Department. In 1998, I  
21 served as Executive Vice President of Finance and Operations at Applied Power  
22 Corporation, a subsidiary of IDACORP. In April 1999, I became Idaho Power's Vice  
23 President of Finance and Treasurer. From July 2004 to September 2009, I served  
24 as the Company's Senior Vice President of Administrative Services and Chief  
25 Financial Officer and was responsible for all financial and treasury functions as well  
26 as certain corporate functions that support the operations of the utility business.

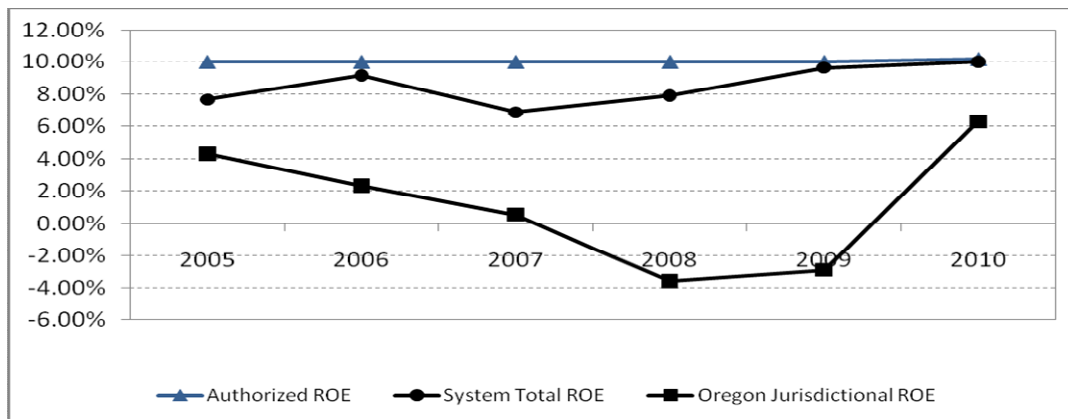
1 These functions include inventory management, procurement, human resources,  
2 information technology, facilities, and communications. Since being appointed Idaho  
3 Power and IDACORP's Executive Vice President of Administrative Services in  
4 October 2009, I continue to oversee Finance, Treasury, and Administrative Services.

5 **Q. What is the purpose of your testimony in this proceeding?**

6 A. My testimony will provide an overview of challenges facing the Company and the  
7 need for general rate relief that is requested in this filing. I will describe the growth in  
8 investment and expenses since the Company's last general rate case. In addition, I  
9 will describe the reasons why utility costs are increasing and discuss how Idaho  
10 Power is prudently managing those cost increases. Lastly, I will discuss the  
11 Company's earnings performance since 2008 and explain that the Company has not  
12 earned its authorized return on equity ("ROE") for more than five years and does not  
13 expect to do so in 2011, unless the Company is successful in its effort to sustain a  
14 positive determination from the Internal Revenue Service regarding its request to  
15 change tax methods related to uniform capitalization for income taxes. The chart  
16 below shows Idaho Power's system-wide annual actual ROE and its Oregon  
17 jurisdiction normalized ROE (which is what is used for the Oregon earnings test)  
18 compared to its authorized ROE over the last six years. As depicted below and in  
19 Exhibit 201, the average of the Oregon jurisdiction normalized ROE has been 1.17  
20 percent since 2005.

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**Q. Are you the witness that can address overall Company policy?**

A. Yes.

**Q. What are the challenges facing the Company?**

A. Rising prices and costs, constrained capacity, and the uncertain impacts of climate change legislation are challenges facing utilities across the nation, and Idaho Power is no different. Despite considerable investment and expansion in recent years, much of the Company's system is currently fully utilized. To provide safe, reliable service to all customers, the Company must continue to make major investments in both new and existing infrastructure. Worldwide demand for the materials and services required to build needed infrastructure has driven up prices dramatically over the last several years. Climate change concerns require selection of lower emission-generating resources that are often more costly compared to Idaho Power's current generating fleet. Also, the Company must operate under increasingly complex compliance standards.

Idaho Power's credit quality as measured by the national credit rating agencies has stabilized, albeit at a lesser credit quality than in prior years and at the lower end of investment grade. Rates in effect today—absent one-year impacts of changes to certain tax methods that I will describe later in my testimony—do not provide the Company a sufficient opportunity to earn the rate of return necessary to

1 assure access to the capital markets to finance needed investments under  
2 reasonable terms. Any delay in or lack of recovery of prudent operating or financing  
3 costs is seen as risk by the financial community, including the credit rating agencies,  
4 during this period of plant expansion and difficult economic times. These pressures  
5 combine to present a formidable challenge to sustaining the financial health,  
6 operational excellence, and, ultimately, the independence of the Company.

7 **Q. You mentioned growth in investment over the past few years. What is driving**  
8 **the growth in investment since the Company's last general rate case?**

9 A. Idaho Power and the utility industry in general are experiencing a cycle of heavy  
10 infrastructure investment. Although there has been a pause in the rapid growth  
11 experienced a few years ago, growth is still occurring as the Company continues to  
12 add new customers. The Company must be prepared to serve that growth as it  
13 occurs. To provide safe, reliable service to all customers, the Company must make  
14 investments in both new and existing infrastructure. The Company is adding  
15 capacity to its base load generation, transmission system, and distribution facilities to  
16 ensure an adequate supply of electricity to customers, to provide service to new  
17 customers, and to maintain system reliability.

18 Idaho Power's aging transmission and distribution infrastructure requires  
19 continuing investment in upgrades and replacement to maintain their operational  
20 viability. The Company's aging hydroelectric and thermal generation facilities also  
21 require continuing investment in upgrades and component replacement. In addition,  
22 environmental mandates require the replacement or retro-fitting of aging equipment  
23 with more expensive technology. Idaho Power has partnership investments in coal  
24 facilities that are over 30 years old and require additional investment to maintain their  
25 operational viability while continuing to provide low-cost baseload generation. In  
26

1 addition, the Company is operating in an environment of ever-increasing reliability  
2 and compliance standards that also require increased levels of investment.

3 **Q. In light of the continued need for investment in new infrastructure for**  
4 **distribution, transmission, and generation resources, what is the Company**  
5 **doing to reduce the need for this new investment?**

6 A. Idaho Power takes its legal obligation to serve the energy needs of its customers  
7 seriously. In planning to meet customer energy needs, the Company assesses both  
8 supply-side and demand-side options. In addition to expanding its production and  
9 delivery systems, the Company is aggressively promoting demand-side management  
10 and energy efficiency programs and services. These efforts serve to reduce the  
11 pace of growth in investment in a cost-effective manner by delaying the need for  
12 additional generating resources. Additionally, these efforts help to educate  
13 customers on how they use energy.

14 **Q. Please briefly describe the current business environment in which the**  
15 **Company is operating and expected to operate in up to and through the date**  
16 **rates are adopted in this proceeding.**

17 A. The Company's service area continues to experience difficult economic times.  
18 However, the current downturn in the economy will not persist forever and Idaho  
19 Power must be in a position to respond to its customers' needs as the economy  
20 begins to recover.

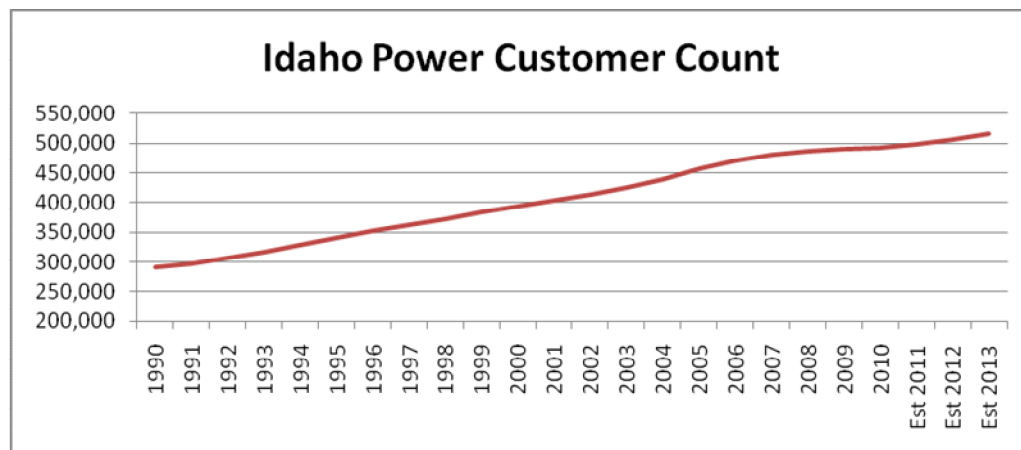
21 **Q. With the continued negative economic news, why is it that utility investment is**  
22 **expected to increase?**

23 A. Despite all the relatively negative economic news, the forward-looking view is more  
24 positive. The May 2011 Oregon Economic Forecast issued by the Oregon Office of  
25 Economic Analysis indicated that:  
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Similar to the US economy, the Oregon economy appears to be on firmer footing. The job growth picture has improved and Oregon had the 7<sup>th</sup> fastest job growth year over year for March 2011 among the 50 states. Job growth surged in the first quarter of 2011, which was the third strongest quarterly performance dating back to 1990. The job gains in the first quarter were broad based with virtually all sectors seeing strong growth. The unemployment rate has dropped slightly and was 10 percent in March 2011, compared to 11 percent in March 2010.

As reflected in Appendix A1 of the 2011 Integrated Resource Plan, over the next three years, the Company is expecting billed sales to increase an average of three percent. In addition to this expected growth, other potential new large loads totaling approximately 740 megawatts (“MW”) have made inquiries to the Company, of which approximately 20 percent of those inquiries came from the Oregon service area. Overall, the Company expects to add up to 6,000 customers this year. The following graph shows actual and projected growth in number of customers from 1990 through 2013.



This growth, combined with the need to refurbish the existing infrastructure utilized to serve Idaho Power’s nearly 500,000 customers safely and reliably on a 24 hours a day, 7 days a week basis, is what continues to drive the Company’s new utility investment.



**I. INVESTMENT GROWTH**

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**Q. How would you describe the environment that Idaho Power encounters when seeking financing for capital projects?**

A. As discussed in Mr. Steven R. Keen's testimony, Idaho Power's credit quality as measured by the national credit rating agencies has become stable only during the last year. However, Mr. Keen believes that Idaho Power will need to show sustained, improved financial results before its credit ratings will improve. Idaho Power is able to raise capital in today's market with its current ratings, but at a higher cost than if its credit ratings were higher. Customers benefit when the Company has ready access to capital markets under reasonable terms in order to finance needed investments in infrastructure.

**Q. Please describe the growth of investment since the Company's last rate case.**

A. Since the Company's last general rate case in 2009, it has placed in service over \$316 million in gross plant.

**Q. Please discuss the Company's investment in generation plant.**

A. The Company made significant investments in all four of the Jim Bridger Power Plant units to install pollution control equipment as required to comply with the Regional Haze Best Available Retrofit Technology ("RH BART") ruling from the state of Wyoming. Investment in 2011 for the installation of additional pollution control equipment will be required to comply with the RH BART ruling. Also at the Jim Bridger Power Plant, the Company completed a project in 2010 to upgrade the turbines on Unit #1 in order to improve turbine efficiency. In 2011, the Company will also make investments at the Valmy Power Plant Unit #1 to replace the reheating tube, cooling tower and secondary super heater assembly, and to upgrade the evaporation pond liner.

1 Total nameplate generating system capacity increased by 9 MW from 3,267  
2 MW at the end of 2008 to 3,276 MW at the end of 2010.

3 **Q. Please discuss the Company's investment in its transmission system.**

4 A. In 2010, the Company completed the construction of the new 500 kilovolt ("kV")  
5 Hemingway Transmission Station and the associated Hemingway to Bowmont 230  
6 kV transmission line (collectively referred to as "Hemingway") with a total cost of \$54  
7 million. Operating constraints in the Northwest and load growth in Idaho Power's  
8 service area since 2003 required an additional transmission path coming into the  
9 Treasure Valley by the summer of 2010. Hemingway provides that additional route  
10 for power to flow into and out of the service area, improves reliability, and is integral  
11 to the operation of the system as a whole.

12 Hemingway proved to be crucial to system reliability in the summer of 2010  
13 when wild fires burned close to the Midpoint 500 kV transmission line. That line had  
14 to be taken out of service due to the proximity of the fires. If Hemingway had not  
15 been in service, additional sections of the 500 kV transmission system would  
16 necessarily have been taken out of service. With Hemingway in service, only the  
17 Midpoint to Hemingway section of the line had to be taken out of service, leaving  
18 other sections available to serve load.

19 In 2010, the Company completed a rebuild of the 69 kV Vale to Drewsey  
20 transmission line at a cost of approximately \$500,000 and the 69 kV Pine Creek to  
21 Hells Canyon transmission line at a cost of approximately \$360,000. Both of these  
22 projects will improve the reliability and performance of the transmission lines.

23 In 2009, the Company completed the construction of the new 230 kV Danskin  
24 to Hubbard transmission line. This project utilized an existing de-energized 138 kV  
25 transmission line route and provides enhanced reliability and additional access to the  
26 Company's Danskin generation unit.

1 Total transmission line miles increased from 4,752 miles at the end of 2008 to  
2 4,817 miles at the end of 2010.

3 **Q. Please discuss the Company's investment in distribution facilities.**

4 A. With the installation of 17,500 smart meters and associated station and  
5 communication equipment, in 2010, the Company completed the deployment of the  
6 Advanced Metering Infrastructure ("AMI") technology in its Oregon service area at a  
7 cost of approximately \$3 million.

8 In 2010, Idaho Power installed its first circuit breaker outside the fences of a  
9 substation, the HRJA R2 Breaker near Harper, Oregon, at an approximate cost of  
10 \$300,000. The breaker will function as a reclosure on the 69 kV line to the Drewsey  
11 area and will improve reliability in the Vale area. This innovative project saves  
12 money because estimated project costs are about one-third of a substation.

13 Total distribution line miles (overhead and underground) increased from  
14 26,576 miles at the end of 2008 to 26,697 miles at the end of 2010.

15 **II. GROWTH IN EXPENSES**

16 **Q. What changes in costs is the Company experiencing which contribute to the  
17 need for a rate increase?**

18 A. The Company is experiencing cost increases related to power production,  
19 compliance requirements, reliability requirements, materials and supplies, land use  
20 fees, maintenance costs, and labor costs. I will briefly discuss some of these  
21 changes.

22 **Q. Please discuss increases in power production costs.**

23 A. Power production costs have increased primarily due to operations and maintenance  
24 ("O&M") increases passed on to Idaho Power by the Company's operating partners  
25 at jointly owned thermal plants. Higher maintenance costs associated with aging  
26 equipment, increased labor costs resulting from union contracts that were

1 renegotiated in 2010, and higher chemical costs are the primary drivers of the  
2 increases. Costs have increased at the Company's Bennett Mountain plant primarily  
3 due to required periodic combustor inspections and combustor parts refurbishment.  
4 There have also been price increases in the chemicals used in the thermal plants,  
5 along with environmental compliance that requires the use of more chemicals.

6 **Q. Please discuss increases in compliance related costs.**

7 A. There has been an increase in mandatory compliance required of Idaho Power, and  
8 utilities in general, related to reliability, environmental compliance, safety, and  
9 security. These changes drive corresponding increases in regulatory compliance  
10 costs. I will briefly describe some of the areas where compliance related expenses  
11 have increased.

12 The North American Electric Reliability Corporation ("NERC") now requires  
13 Light Detection and Ranging surveys to verify transmission line rating values. Costs  
14 for 2011 are expected to \$1.4 million and the project will be ongoing through 2013.

15 Beginning in 2011, Idaho Fish and Game hatchery operation expenses are  
16 projected to increase \$730,000 per year due to a number of factors, including  
17 expanded harvest monitoring and harvest performance evaluation, increased  
18 personnel, higher Fish and Game O&M and overhead costs, development of a fish  
19 identification system, and a contribution toward a region-wide hatchery database.

20 Cumulatively, Federal Energy Regulatory Commission ("FERC")  
21 administrative and land use fees have increased \$480,000 since 2008. Western  
22 Electricity Coordinating Council ("WECC") annual dues have increased over  
23 \$200,000, or 33 percent from 2008 to 2011.

24 In 2011, Idaho Power added three new positions to manage and comply with  
25 the increased regulatory compliance requirements of the FERC, NERC, and WECC.

26 **Q. Please discuss increases in reliability requirement related costs.**

1 A. The Energy Policy Act of 2005 significantly impacted the national reliability standards  
2 for utilities and changed compliance from voluntary to mandatory starting in June  
3 2007. These standards apply to the bulk power system in North America and are  
4 enforced by the NERC and WECC. Non-compliance with any of the requirements  
5 may result in monetary penalties up to \$1 million per day per violation. NERC's more  
6 than 100 reliability standards are mandatory, enforceable, and primarily address  
7 system operation, transmission planning, and equipment maintenance.

8 **Q. How does Idaho Power measure the reliability of its distribution system?**

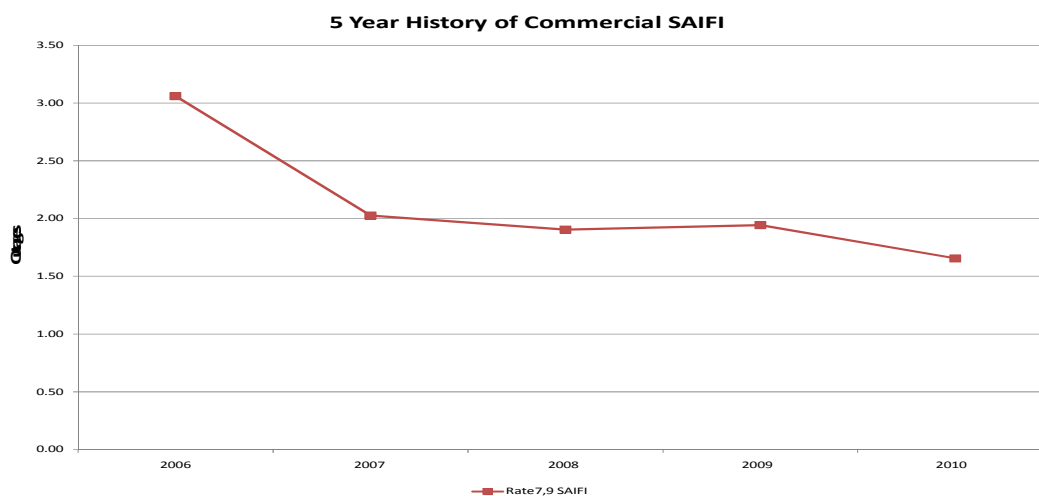
9 A. In the electric industry, reliability is, simply put, how good companies are at  
10 consistently keeping customers' lights on. Idaho Power measures its distribution  
11 system reliability by using industry recognized reliability metrics such as the System  
12 Average Interruption Frequency Index ("SAIFI"), the System Average Interruption  
13 Duration Index, and the Momentary Average Interruption Frequency Index. In  
14 general, these indices look at the average number of outages and the duration of  
15 outages experienced by customers across the system.

16 **Q. What are Idaho Power's reliability results?**

17 A. In 2007, the Company increased its focus on reliability and consolidated its reliability  
18 activities under one senior manager. Since that time, there have been measured  
19 improvements in the Company's reliability metrics. For instance, in 2006, the system  
20 SAIFI was 3.06 average outages per year for commercial customers. In 2010, the  
21 system SAIFI had improved to 1.66 average outages per year for commercial  
22 customers. An outage is defined as an interruption to electric service lasting five  
23 minutes or longer. Commercial accounts are one of the customer classes most  
24 impacted financially by an outage. Commercial accounts are also fairly evenly  
25 spread across the service area. This means that work performed in an area to  
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1 improve reliability for commercial customers will, in most cases, also improve  
2 reliability for a proportional number of customers in other rate classes.

3 The graph below shows the improvements in the last five years of Idaho  
4 Power's commercial customers' SAIFI measurements.



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**Q. Please briefly describe Idaho Power's recent efforts to improve reliability in its Oregon service area.**

A. In addition to the projects discussed earlier, Idaho Power has completed many projects to either maintain or improve reliability in its Oregon service area. These projects include work such as the maintenance and replacement of certain distribution line equipment devices, replacement of distribution wood cross-arms, rebuilding distribution feeders, replacing distribution wood cross-arms and associated wood pins, injecting and replacing certain underground distribution cables, and improving portions of the transmission system and substations.

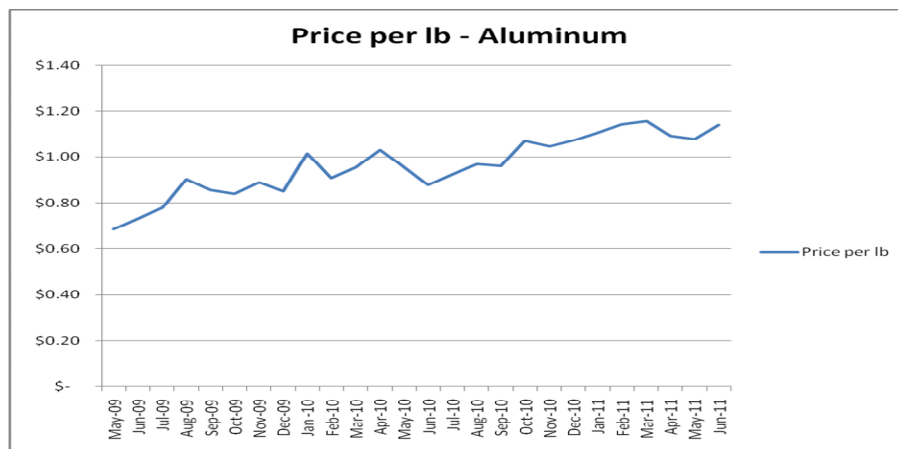
**Q. Please discuss the increases in material and supply-related costs.**

A. Many of the main categories of materials that the Company uses in its operations have seen upward market price shifts in recent years. These categories include transformers, wood poles, pole line hardware, and cable/conductor, which comprise

1 most of the components of the distribution network for serving customers and  
2 contribute to overall product costs.

3 **Q. What is causing the increase in the cost of materials for Idaho Power, and the**  
4 **utility industry in general?**

5 A. A major driver for increases in material costs has been the significant increase in  
6 certain commodity costs (copper, aluminum, and steel) over the last few years.  
7 These commodities are primary components of many of the materials that Idaho  
8 Power utilizes throughout its system. The charts below illustrate the overall upward  
9 trend in the prices of key commodities. As can be seen on the chart below,  
10 aluminum has increased 66 percent from May 2009 to June 2011.

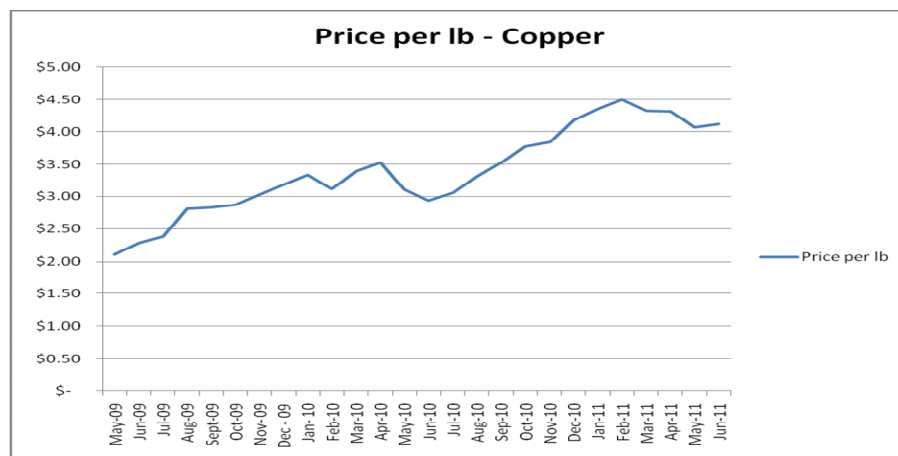


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Copper has likewise increased 95 percent from May 2009 to June 2011.



1 Standard plate steel has increased 82 percent from May 2009 to June 2011.

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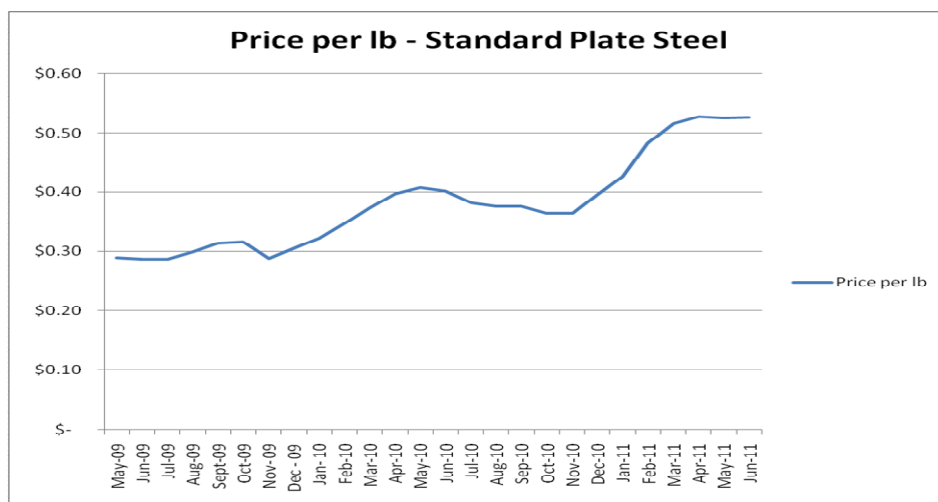
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**Q. What has Idaho Power done to manage the volatility of commodity costs?**

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A. Idaho Power utilizes a strategic sourcing process to ensure competitive pricing from its suppliers. The process ensures that the Company receives fair market pricing throughout the duration of its agreements with its suppliers by including price adjustment mechanisms (de-escalation/escalation) within its contracts. These price adjustment mechanisms, which are negotiated when the Company has competitive leverage, determine when and how pricing will adjust related to predetermined factors (i.e., commodity prices).

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**Q. What is driving the increase in land use fees?**

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1 A. Idaho Power pays land use fees to the Bureau of Land Management (“BLM”) for its  
2 facilities that are located on public lands. At the end of 2008, BLM amended its right-  
3 of-way regulations to update the linear right-of-way rent schedule. The new rates  
4 took effect in 2009. Land use fees are charged by the acre and based on the land  
5 values in individual counties. As an example, in 2011, BLM will charge \$159.93 per  
6 acre for use of public lands located in Ada County compared to \$22.58 per acre in  
7 2008. Overall, BLM land use fees paid by Idaho Power have increased over \$1  
8 million on an annual basis from 2008 to 2011.

9 **Q. Please provide a general discussion of Idaho Power’s compensation**  
10 **philosophy.**

11 A. Idaho Power’s compensation philosophy is to provide a balanced, competitive, and  
12 sustainable total compensation package, ensuring it attracts and retains high quality  
13 employees and motivates them to achieve performance goals that benefit customers  
14 and shareholders. Maintaining a competitive compensation package allows the  
15 Company to recruit and retain its highly-skilled workforce. The competitiveness of  
16 Idaho Power’s compensation package also supports the Company’s intent to  
17 maintain a flexible workforce that can easily adjust work duties and assignments to  
18 meet changing demands and operational needs, which in turn keep the Company’s  
19 costs of service lower. Thus, because of increases in market compensation, the  
20 Company has been required to increase its own labor expense in order to maintain a  
21 market competitive compensation package.

22 **Q. Please describe the rationale for the Company’s general wage adjustment in**  
23 **2011.**

24 A. The Company closely monitors trends in the utility industry and attempts to ensure  
25 that its overall compensation package is within market ranges. The Company  
26 reviews industry specific data from salary budget surveys that are produced by

1 independent consulting firms, including Towers Watson, Mercer, Hewitt, and World  
2 at Work. The Company's main objective in this review is to ensure that any general  
3 wage adjustment percentage realigns employee compensation at levels that remain  
4 competitive when compared to other utilities' annual salary compensation. A further  
5 evaluation is conducted that compares the Company's general wage adjusted  
6 compensation to compensation provided by a specific group of peer companies  
7 comprised of similar-sized, investor-owned utilities and other intermountain utilities.  
8 The Company also considers the salary provided by other companies in its service  
9 area.

10 In recent years, the Company has been conservative with its general wage  
11 adjustments in comparison with the increases of its peer intermountain utilities. As a  
12 result, the Company has fallen behind its peer companies on base salary for some of  
13 its critical operations roles, such as skilled craft positions. Again this year, in light of  
14 the current economic conditions, Idaho Power decided to grant a general wage  
15 adjustment that was below what other peer utilities in the Intermountain West  
16 granted.

17 **Q. Please describe the standard the Company uses to remain competitive in**  
18 **setting compensation.**

19 A. The Company has a grade and step pay system. The highest step in any grade is  
20 step 13. The Company standard for remaining competitive is to set the step 13 pay  
21 to be approximately equal to the median pay for a comparable position in the peer  
22 compared market.

23 **Q. What was the general wage adjustment granted in 2011 and how did that**  
24 **compare to other companies in the same industry and/or region?**

25 A. Idaho Power granted a 2 percent general wage adjustment in 2011. According to its  
26 analysis of salary increase budget surveys in the utility industry, companies were

1 projecting average structural salary increases of 2.8 percent for 2011. Union  
2 contract increases of Idaho Power's peer utilities averaged 2.9 percent for 2011, and  
3 the average non-union salary structure increase for the same peer group of  
4 companies was 2.8 percent for 2011. The local companies contacted were  
5 projecting an average salary structure increase of 2.5 percent for 2011.

6 The Company's analysis indicates that in recent years, Idaho Power has  
7 fallen below its peers such that it will take a 5 percent increase to bring its critical  
8 operations positions to the average market base salary rate of its utility peer  
9 companies. Given the current economy, the Company has been slow to keep pace  
10 with the structural wage adjustments provided by others and is not requesting a rate  
11 adjustment that would allow the Company to increase its wages to the same level as  
12 its peers.

13 **Q. What else is Idaho Power doing to manage its costs and mitigate the impact of**  
14 **increased costs on its customers?**

15 A. Idaho Power is continually looking for ways to reduce the costs of the services it  
16 provides to its customers and for ways to provide those services more efficiently. As  
17 seen in the following graph, Idaho Power has done a good job of managing its costs  
18 as evidenced by the growth in Idaho Power's O&M expenses compared to the  
19 growth in the Consumer Price Index ("CPI") plus the growth in number of customers  
20 served expressed as a percentage.

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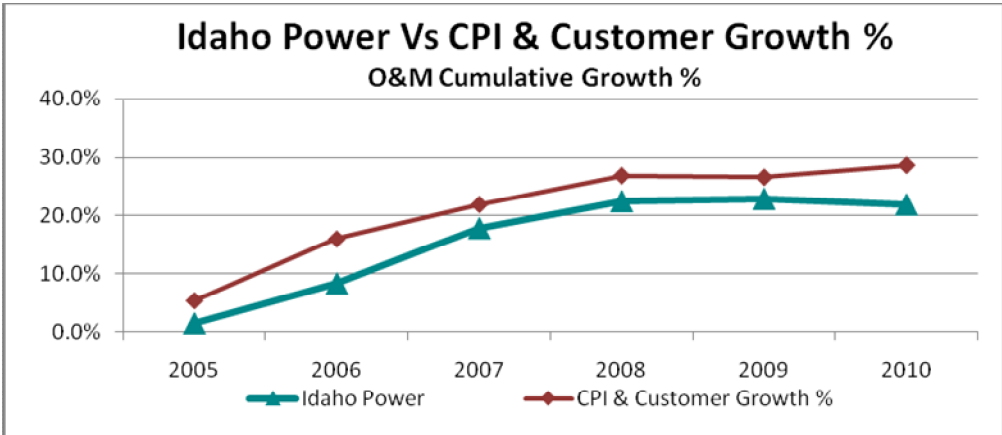
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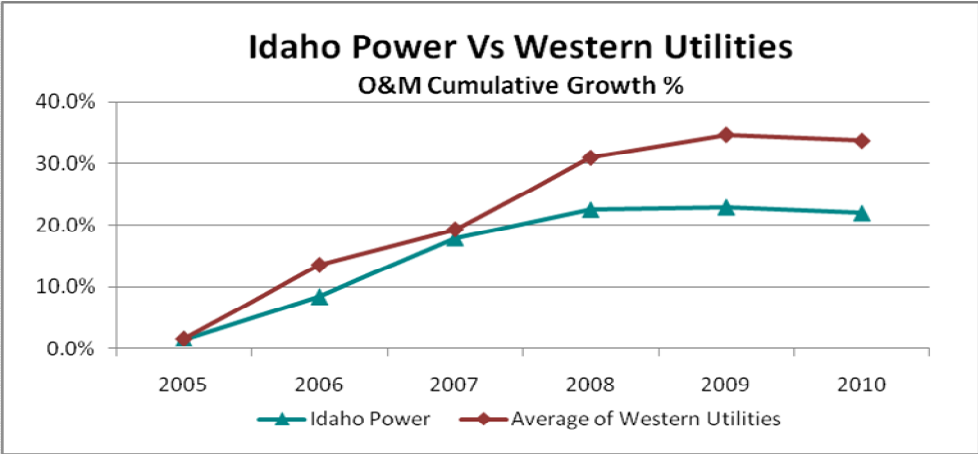
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As can be seen in the below graph, Idaho Power has also positively managed its O&M growth as compared to other western utilities.



**Q. Can you discuss how the Company has managed expenses?**

A. Yes. The Company has been able to reduce employee headcount, control budgets, and reduce required fleet operations.

**Q. Please describe the Company's efforts in managing employee headcount.**

A. Approval for all replacement or new positions must be reviewed by me or the Executive Vice President of Operations. Employee headcount has decreased by a total of 37 people from the end of 2008 to the end of 2010 and, excluding temporary resources hired for the Smart Grid initiative, headcount has decreased by 70 people

1 during this same time period. This represents a decrease in headcount of  
2 approximately three percent from 2008 to 2010, while total customers served  
3 increased one percent over the same time period. Therefore, the number of  
4 customers served per employee has increased from 234 in 2008 to 241 in 2010. At  
5 the end of 2011, total employee headcount is projected to be 42 people lower than at  
6 the end of 2008.

7 **Q. Please describe the Company's efforts to control budgets.**

8 A. Idaho Power employs a robust capital and O&M budgeting process. The capital  
9 budget process begins with project managers, maintenance personnel, planners,  
10 and others within the business identifying needs and submitting projects to business  
11 unit management. Business unit management reviews submitted projects and  
12 prioritizes them based on spending guidelines provided by senior management. The  
13 Company's 2011 annual capital budget is approximately \$200 million (excluding the  
14 Langley Gulch power plant project), which is down from approximately \$249 million  
15 actually spent in 2008.

16 Operations and maintenance budgets are established based on extensive  
17 discussions between the business units and senior management, and represent a  
18 combination of prior year experience plus or minus identified changes and  
19 adjustments. As the Company prepared its O&M budgets for 2011, the target was  
20 based on holding to a 2010 budget with only identified unavoidable increases  
21 allowed as an adjustment.

22 Throughout the year, senior management reviews the status of spends for  
23 both O&M and capital against short-term estimates as well as original budget.  
24 Variances are reviewed and analyzed in order to determine changes that may need  
25 to be made during the year to manage to budgeted levels of spend.

26 **Q. Please discuss the reduction in expenses related to fleet services.**

1 A. The Company has significantly reduced the gallons of fuel it uses in its fleet  
2 operations by a projected 54,000 gallons from 2008 to 2011. This is mostly due to  
3 the reduction of metering vehicles associated with the implementation of AMI and  
4 has helped offset some of the significant increases in gasoline prices experienced  
5 recently. A recent fleet benchmarking study completed by Utilimarc based on 2009  
6 costs indicated that Idaho Power ranked in the first quartile for cost competitiveness.

7 **III. EARNINGS**

8 **Q. What has Idaho Power's system total annual ROE been since 2008?**

9 A. Idaho Power's system total annual ROE was 9.62 percent for 2009 and 10.01  
10 percent for 2010. However, it is important to note that there was a tax benefit related  
11 to repairs allowance that occurred in 2010. If not for that tax benefit, the Company's  
12 system total ROE would have been 7.9 percent. The testimony of Mr. Keen  
13 discusses the tax benefit that occurred in 2010 in greater detail.

14 **Q. Please provide additional discussion of the uniform capitalization method for  
15 income taxes ("UNICAP").**

16 A. In 2010, Idaho Power reached an agreement with the Internal Revenue Service  
17 related to the Company's uniform capitalization method for tax reporting. This issue  
18 is currently awaiting approval from the U.S. Congress's Joint Committee on Taxation  
19 ("Joint Committee") and, if approved, Idaho Power would record approximately \$60  
20 million of tax benefit in the quarter that the approval is received. Idaho Power cannot  
21 predict when the Joint Committee will complete its review or the outcome of that  
22 review, but believes the likelihood of receiving a determination in 2011 is enhanced  
23 given that the case was submitted in April 2011. Mr. Keen's testimony discusses this  
24 issue in greater detail.

25 **Q. Did you provide any specific instructions to the Regulatory Affairs Department  
26 in preparing this general rate case filing?**

1 A. Yes. In recognition of the prolonged economic downturn and concern for the impact  
2 of any rate increase on Idaho Power's customers, I instructed Mr. Gregory W. Said,  
3 Vice President of Regulatory Affairs, to identify areas where the Company could  
4 forego requesting an increase at this time. As described further in Mr. Timothy E.  
5 Tatum's testimony, Mr. Said directed his department to hold O&M expenses to 2010  
6 levels with the exception of specific cost categories that are "known" to be materially  
7 different in 2011 and to hold normalized total power supply expenses to the currently  
8 approved normalized levels determined under the October Update component of the  
9 2011 Annual Power Cost Update ("APCU").

10 **Q. Can you summarize the Company's requested rate increase and explain why it**  
11 **is important not only to Idaho Power but in the best interest of customers?**

12 A. This general rate request reflects a revenue requirement increase of approximately  
13 \$5.8 million, or a 14.67 percent increase and includes a requested ROE of 10.5  
14 percent. As further discussed in Mr. Keen's testimony, this requested ROE is at the  
15 bottom end of the recommended ROE range. However, the Company recognizes  
16 that in the current economic climate, it is appropriate for the Company to attempt to  
17 mitigate the rate impact on our customers, while still providing a fair investment  
18 opportunity for the Company's shareholders. This increase is important for Idaho  
19 Power to achieve fair and timely recovery of its prudently incurred expenses and a  
20 reasonable return on the Company's investment in its electrical system, which  
21 today's rates do not fully provide. Continued growth in demand for electricity, aging  
22 infrastructure, and higher compliance and reliability requirements are driving the  
23 need to invest large amounts of capital to expand and improve electricity supply,  
24 delivery, and reliability. This increases the Company's need to access both the debt  
25 and equity markets to fund large amounts of capital investment in the system. In this  
26 environment, timely and fair recovery of the Company's prudently incurred expenses

1 and investments is critically important to helping it attract capital investment and  
2 manage financing costs. A low cost of capital ultimately has a beneficial impact on  
3 customers' rates. By providing for fair and timely recovery of the Company's  
4 expenses it incurs on behalf of customers and investments in the systems and  
5 activities that serve its customers, this rate increase is in the best interests of the  
6 Company, its shareholders, and the people and communities it serves.

7 **Q. Does this conclude your testimony?**

8 A. Yes.

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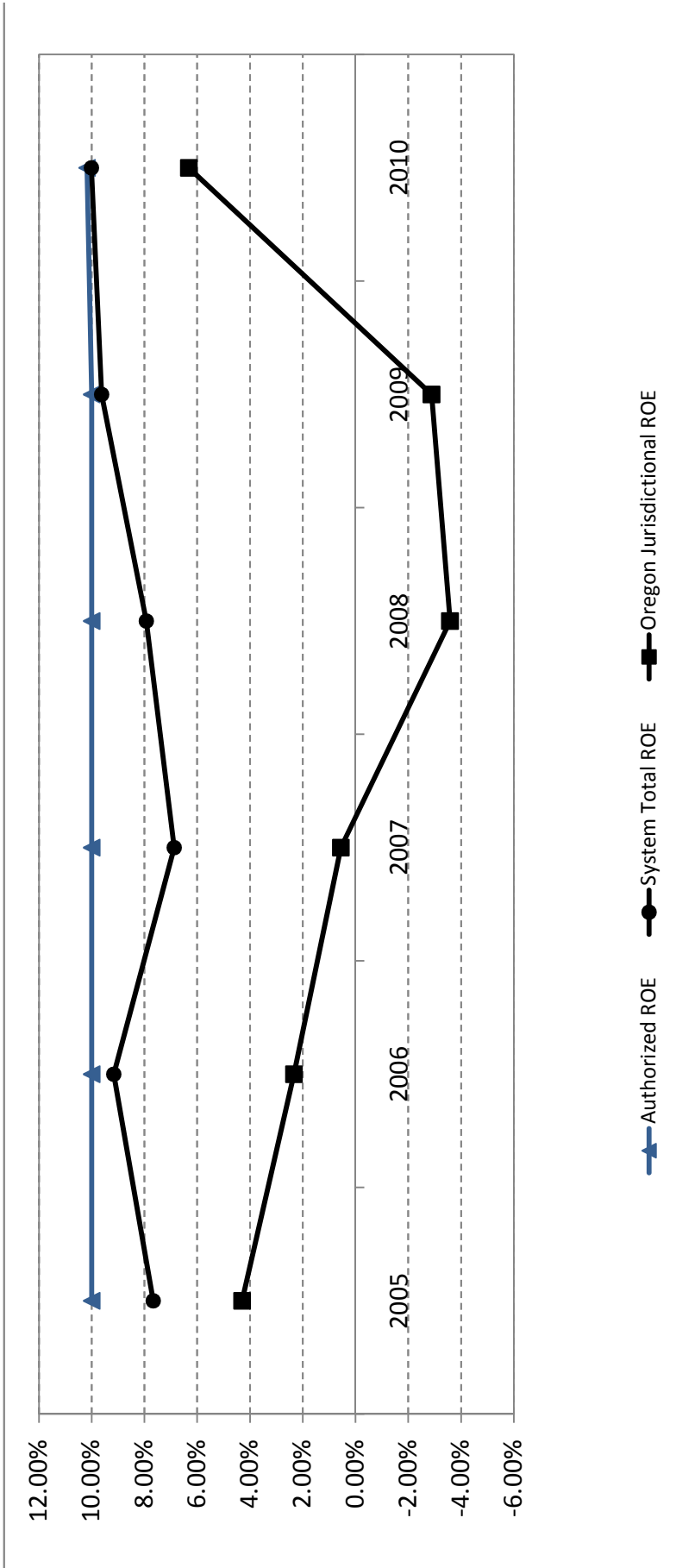
BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Darrel Anderson  
Return on Equity Graph

July 29, 2011



**Data For Graph**

	2005	2006	2007	2008	2009	2010
Authorized ROE	10.00%	10.00%	10.00%	10.00%	10.00%	10.175%
System Total ROE	7.66%	9.16%	6.88%	7.92%	9.62%	10.01%
Oregon Jurisdictional ROE	4.30%	2.33%	0.56%	-3.58%	-2.88%	6.32%
1.17% Average 2005 - 2010						

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )

\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**WARREN KLINE**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Warren Kline and my business address is 1221 West Idaho Street,  
3 Boise, Idaho.

4 **Q. What is your position at Idaho Power Company (“Idaho Power” or**  
5 **“Company”)?**

6 A. I am the Vice President of Customer Operations.

7 **Q. Please outline your business experience.**

8 A. I began working full time in the electric utility industry at Idaho Power over 37 years  
9 ago, soon after I graduated from high school. For the last six years I have been an  
10 officer of the Company. I joined the Company in 1973 in the Customer Service  
11 department and have spent the majority of my career with the Company in the  
12 customer service and field operations areas. I became a member of the Company’s  
13 senior leadership team in 1989 when I was named Division Accounting Manager.  
14 Since then, I have held positions of increasing responsibility, including Customer  
15 Service Manager, General Manager of Customer Service and Metering, General  
16 Manager of Regional Operations, and Vice President of Customer Service and  
17 Regional Operations. In 2010, I was promoted to my current position as Vice  
18 President of Customer Operations.

19 **Q. What educational opportunities have you had while at Idaho Power?**

20 A. While at Idaho Power, I have attended many utility management training programs,  
21 including the University of Idaho’s *Utility Executive Course*, which I completed in  
22 1989.

23 **Q. What are your duties as Vice President of Customer Operations?**

24 A. I am responsible for the planning, directing, and strategic oversight of all activities  
25 within the Customer Operations organization.

26 **Q. Please describe the Customer Operations organization.**

1 A. The Customer Operations organization within Idaho Power is comprised of  
2 approximately 600 employees that are engaged in all of the activities that provide  
3 direct service to the Company's customers and communities. Specifically, my  
4 organization includes Customer Service, Customer Relations and Energy Efficiency,  
5 Metering, Regional Operations, Regional Operations Support, Community Relations,  
6 and Smart Grid Projects. All of the activities that directly provide service to the  
7 customer are in this organization, which allows the employees in the organization to  
8 achieve synergies and work together in a seamless manner. The Customer  
9 Operations organization exists to provide excellent service to customers in the most  
10 cost-effective way possible while still maintaining a strong commitment to safety.

11 **Q. What is the purpose of your testimony in this proceeding?**

12 A. I will briefly describe some recent changes in the Customer Operations organization  
13 and then I will discuss various initiatives that the Company has and is undertaking to  
14 provide superior customer service, pursue efficiencies in its operations, and enhance  
15 customer choices. Specifically, my testimony will focus on activities in the following  
16 areas of the Company that impact customer satisfaction: (1) Customer Operations  
17 reorganization; (2) Mobile Workforce Management; (3) Advanced Metering  
18 Infrastructure; (4) Smart Grid Projects; (5) Energy Efficiency; (6) Customer Relations;  
19 and (7) Customer Service.

20 **I. CUSTOMER OPERATIONS REORGANIZATION**

21 **Q. What has Idaho Power done recently to improve customer-focused**  
22 **operations?**

23 A. One of the actions Idaho Power implemented was a reorganization of its regional  
24 operations.

25 **Q. Why was this effort undertaken?**

26

1 A. Responding to the slowdown of the economy, the Company has reassessed its  
2 organization and restructured its regional leadership in order to provide for the  
3 current needs of its customers and the communities Idaho Power serves.

4 Technology investments in Advanced Metering Infrastructure and Mobile  
5 Workforce Management systems have allowed the Company to adjust its workforce,  
6 alter its procedures, and focus on areas of interaction with customers. Idaho Power  
7 has made organizational changes designed to leverage the efficiencies associated  
8 with new technologies and to enhance customer service. This reorganization has  
9 permitted the Company to better align and adjust customer/employee ratios within  
10 each region across Idaho Power's service area.

## 11 **II. MOBILE WORKFORCE MANAGEMENT**

12 **Q. What is Mobile Workforce Management ("MWM")?**

13 A. MWM is a software tool that automates and optimizes daily field processes and  
14 workflows in real time across Idaho Power's service area, resulting in increased  
15 efficiencies and higher customer satisfaction. Field personnel have Mobile Data  
16 Terminals ("laptops") in their vehicles that are connected via cellular or satellite  
17 technology which in turn relay their location to Mobile Workforce Operators  
18 ("Operators") so field personnel can be dispatched most efficiently.

19 **Q. When was MWM implemented?**

20 A. MWM was implemented in November of 2008.

21 **Q. How do customers benefit from MWM?**

22 A. If a customer needs a same day order or has an outage, the Operator can locate the  
23 closest employee with the appropriate skill set to complete the order and dispatch  
24 him/her to the site. Field personnel who receive the order also receive the exact  
25 location on their laptop and can travel directly to the site without further investigation.  
26

1 The MWM system helps Company employees meet customers' expectations by  
2 completing the jobs as promised in a timely manner.

3 Another benefit of the MWM system is that when field personnel are at a  
4 customer's location to disconnect service for non-payment, they have current and  
5 complete information that enables them to discuss payment arrangements with the  
6 customer, and possibly avoid the disconnection if payment is received or payment  
7 arrangements are made onsite. This benefit of MWM eliminates the need for the  
8 customer to make a separate call to the Customer Service Center to make payment  
9 arrangements at that point in time. In the event that a customer makes a payment or  
10 payment arrangements before field personnel arrive, the disconnection can be  
11 canceled.

12 **Q. What efficiencies have been gained as a result of this process automation?**

13 A. A number of efficiencies have been realized over time. Before MWM, when new  
14 meters were installed, the meter number was written on a piece of paper and then  
15 entered into the customer system manually. This process created two points of  
16 possible error—both recording and data input. On the other hand, MWM allows the  
17 field personnel to scan in the meter number as it is installed, eliminating both sources  
18 of possible error.

19 Throughout the day, orders are completed and the Customer Information  
20 System is updated electronically, showing in real time the status of an account.  
21 Before MWM, the orders were entered as completed at the end of the day after the  
22 field personnel brought them back to the office.

23 In addition, before the implementation of MWM, orders were printed in the  
24 regional offices and manually sorted. Now orders are being sorted automatically by  
25 the MWM system and delivered to the laptops during the evening. When the  
26

1 employees arrive at work the following morning, their orders are already sequenced,  
2 efficiently routed, and ready to be executed.

3 By transitioning to a more automated system, employees are more efficient  
4 and more accurate, and employee costs are reduced.

5 **III. ADVANCED METERING INFRASTRUCTURE PROJECT**

6 **Q. Please briefly describe the Advanced Metering Infrastructure (“AMI”) project.**

7 A. In January 2009, the Company began a project to install AMI, including smart  
8 meters, for customers across its service area. This technology provides enhanced  
9 customer and environmental benefits, reduces operating costs associated with meter  
10 reading, and improves meter reading accuracy, outage monitoring, and service  
11 restoration.

12 **Q. What type of AMI technology is the Company deploying?**

13 A. After years of extensive technology testing and piloting, Idaho Power determined that  
14 power line carrier (“PLC”) technology was the best functional and economic fit given  
15 the Company’s customer density and service area. With this technology, Idaho  
16 Power will be able to deploy AMI to approximately 99 percent of all customers and  
17 approximately 90 percent of its Oregon customers. (The lower percentage for  
18 Oregon customers is due to the fact that the sparse population of Idaho Power’s  
19 Oregon service area yielded a larger percentage of customers for whom the AMI  
20 technology was not cost-effective.) The Company has found the two-way PLC  
21 technology to be relatively easy to deploy, robust, reliable, and meets functional  
22 needs at a reasonable cost for a large part of Idaho Power’s service area.

23 **Q. What is the current status of AMI deployment at Idaho Power?**

24 A. As of the end of June 2011, the Company is 30 months into a 36-month AMI meter  
25 deployment plan that began in January of 2009. The Company has installed  
26 390,100 smart meters as part of this phase of AMI deployment. When added to the



1 previous deployment of 28,000 smart meters in Emmett, Idaho, and McCall, Idaho,  
2 the total deployment of smart meters is at 418,100 or 85 percent of Idaho Power's  
3 total customer base. Deployment of the AMI technology in Idaho Power's Oregon  
4 service area was completed in December 2010 with the installation of 17,500 smart  
5 meters. Once the new meters are installed, it is typically only a matter of days before  
6 customers have the option to view their energy consumption data on the Company's  
7 secure website. Idaho Power is on schedule to complete the approximately 79,900  
8 meter installations remaining by the end of 2011.

9 **Q. Please describe your customers' response to the AMI deployment.**

10 A. Overall feedback from customers has been positive. Because the PLC technology  
11 can be installed with a simple meter exchange and provide data to the utility and  
12 customer in a matter of days, the benefits to customers are almost immediate and  
13 the installation can be done without interruption in the normal billing process.

14 The Company has endeavored to make the deployment of AMI a positive  
15 experience for its customers by providing them with information ahead of  
16 deployment, answering individual's concerns one-on-one, and by planning and  
17 executing the project on schedule without impacting the normal billing process.

18 **Q. Specifically, how does AMI benefit customers?**

19 A. Customers with smart meters have access to their detailed energy usage, thus  
20 enabling them to be more informed about their energy consumption and to make  
21 wiser choices about their energy usage. With the AMI system, Idaho Power can  
22 record energy usage on an hourly basis; in the past Idaho Power could only record  
23 total monthly consumption. The recording and management of hourly energy  
24 consumption data is the basis for the Company's ability to provide customers with  
25 access to detailed data about their individual energy consumption and enables Idaho  
26 Power to offer more flexible energy pricing options in the future.

1           Second, the AMI system supports direct load control by providing commands  
2           and confirmation of the action performed by devices installed on customer-owned  
3           equipment, such as air conditioners or irrigation pumps. As part of a demand  
4           response program, direct load control is used to reduce peak load and help reduce  
5           the need for more costly generation resources.

6           The AMI system will also provide valuable outage scoping and restoration  
7           data, enabling Idaho Power to improve outage response and ensure complete  
8           restoration of service faster.

9   **Q. What other benefits do customers receive as a result of AMI deployment?**

10 A. As a result of deploying AMI, Idaho Power has virtually eliminated billing estimations  
11       and meter read errors, thus also reducing billing errors and bill corrections.  
12       Customers can monitor their energy consumption on the Company's website and the  
13       pre-bill information enables them to take more control of their energy usage and  
14       potentially reduce their bill by managing their energy consumption.

15       The Company has found that the data from smart meters is helpful in  
16       resolving customer billing issues and is a great tool to educate customers on their  
17       individual energy consumption patterns and history.

18       Many customers find the AMI system less intrusive because meter specialists  
19       no longer need to access customers' property on a monthly basis to read the meter.  
20       Issues with animals, fences, gates, and property access occur much less frequently  
21       than with a monthly manual meter reading process.

22 **Q. Are there other benefits?**

23 A. Yes. The environmental benefits from AMI are significant. The Company will  
24       remove 75 vehicles from service and eliminate the need to drive more than a million  
25       miles a year. This will reduce Idaho Power's carbon footprint, fuel consumption, and  
26       roadway congestion.

1           Moreover, even though Idaho Power has not yet fully integrated the AMI  
2 system with the outage management system (“OMS”), the Company has used the  
3 system in specific instances to assist in service restoration and confirmation. Once  
4 fully integrated with OMS, the system will provide valuable data about outage scope  
5 and restoration confirmation that will result in more efficient and timely restoration of  
6 power to Idaho Power’s customers.

7           Finally, Idaho Power was able to leverage the AMI project to obtain American  
8 Recovery and Reinvestment Act funding through the United States Department of  
9 Energy (“DOE”) for a Smart Grid Investment Grant (“SGIG”) of \$47 million at no  
10 direct cost to customers.

11                                   **IV. SMART GRID PROJECTS**

12 **Q.   Please describe the Smart Grid initiative at Idaho Power.**

13 A.   On June 25, 2009, the DOE announced the availability of a SGIG funding  
14 opportunity; in response, the Company submitted a proposal for an integrated multi-  
15 system project focused on customer service. The application requested DOE  
16 funding for \$47 million to match the Company’s existing \$47 million AMI project  
17 investment. In October 2009, the Company was notified that its Smart Grid proposal  
18 was one of 100 in the country selected to receive a matching grant. Because the  
19 Company has already received approval from both the Public Utility Commission of  
20 Oregon (“Commission”) and the Idaho Public Utilities Commission to pursue the AMI  
21 project and exchange existing traditional meters with smart meters, no additional  
22 costs will be borne by customers up to \$47 million of SGIG spend above AMI costs.  
23 This funding opportunity has required significant Company effort to manage, but  
24 provides substantial benefits to customers.

25 **Q.   Please briefly describe the Smart Grid projects the Company is working on.**  
26

1 A. The Company is pursuing multiple projects that comprise the Smart Grid initiative.  
2 The projects are generally characterized and grouped as “customer systems” (which  
3 are projects that will provide customer access to smart meter information and  
4 programs enabled by the Smart Grid) and “operations systems” (which are electric  
5 infrastructure improvement projects that are necessary to fully enable the Smart  
6 Grid). My testimony will focus on the customer systems projects described below.

7 • Customer Information System (“CIS”). This project upgrades and  
8 enhances existing functions of the CIS and adds key capabilities that facilitate more  
9 flexible pricing options, a stronger integration with both the AMI system and OMS,  
10 and improved operational efficiency.

11 • Energy Use Advising Tool. This tool will improve the detailed AMI  
12 usage analysis capability of Idaho Power’s current Energy Tools and adds new  
13 features for both customers and Customer Service Representatives (“CSRs”).  
14 Customers will be able to see their “bill to date,” providing useful information on the  
15 costs and pattern of energy consumption since their last bill was prepared. CSRs  
16 will have enhanced usage and bill analysis information that will allow them to provide  
17 more detailed information to customers in order to help them understand their usage  
18 and how it affects their bills.

19 • Meter and Customer Data Warehouse. This project will create a  
20 secure analytic database to store meter and customer data that can be used for  
21 reporting and analysis, and a more efficient data repository to enhance the efficiency  
22 of detailed data viewing for customers and CSRs.

23 **Q. How will customers benefit from the Smart Grid initiative at Idaho Power?**

24 A. The Smart Grid projects will provide measurable results. Customers will have more  
25 detailed information about how they use energy so they can be more energy  
26 efficient. Advanced technology will also help improve system reliability and reduce

1 outage impacts on customers. In addition to all of the benefits described above, the  
2 receipt of the SGIG allows Idaho Power to pursue projects now with little or no  
3 investment cost borne by customers rather than at some later date, when all  
4 investments would have been borne by customers.

5 **V. ENERGY EFFICIENCY**

6 **Q. How does the Company define energy efficiency for purposes of this case?**

7 A. Energy efficiency refers to the Company's activities with respect to energy efficiency,  
8 demand response, and its associated outreach and education initiatives.

9 **Q. What is the Company's goal or philosophy towards energy efficiency and  
10 demand response?**

11 A. The Company is committed to pursuing all cost-effective energy efficiency and  
12 demand response.

13 **Q. How does the Company view energy efficiency and demand response?**

14 A. Cost-effective energy efficiency and demand response programs are the Company's  
15 resource of choice—both from a cost standpoint and from an environmental  
16 perspective. The cleanest, most efficient resource in the Company's portfolio is the  
17 one it does not have to build. The Company believes that cost-effective energy  
18 efficiency and demand response should be pursued aggressively.

19 **Q. Please describe the Company's progress in providing energy efficiency and  
20 demand response programs.**

21 A. The Company's *Demand-Side Management 2010 Annual Report* was provided to the  
22 Commission on April 1, 2011.<sup>1</sup> As noted in the Annual Report, Idaho Power offers  
23 20 energy efficiency and outreach programs and three demand response programs  
24

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25 <sup>1</sup> This voluminous report can be viewed on Idaho Power's website at  
26 <http://www.idahopower.com/EnergyEfficiency/reports.cfm>.

1 with program options for every major customer class. Energy savings from energy  
2 efficiency activities increased on a system-wide basis by 46 percent as compared to  
3 2008. Overall energy efficiency and demand response activities in 2010 resulted in a  
4 358 megawatt (approximately 16 megawatt in Oregon) peak reduction and 187,626  
5 megawatt-hours (approximately 8,631 megawatt-hours in Oregon) in energy savings.  
6 Since 2008, the Company has substantially increased the amount of dollars spent on  
7 energy efficiency. For example, in 2008, energy efficiency program expenses were  
8 about \$21 million while, in 2010, the Company spent approximately \$46 million.  
9 Over 70 percent of 2010 expenses were in the form of program incentives paid to  
10 customers. In Oregon, the investment in energy efficiency and demand response  
11 increased 167 percent since 2008 and energy savings increased by 154 percent.

12 **Q. Are there any other benefits flowing from the Company's energy efficiency and**  
13 **demand response programs aside from energy saving and demand reduction?**

14 A. Yes. These programs, along with the Company's education outreach and customer  
15 energy usage information, provide more opportunities for customers to examine their  
16 energy choices. For example, through the Company's outreach programs,  
17 customers have opportunities to learn about their energy consumption and how to  
18 use energy more efficiently. Using the Company's energy usage presentment tools,  
19 customers can see how their hourly energy usage is affected by their energy  
20 management decisions and the products they use in their homes and businesses.

21 **Q. What is the source of funding for the Company's energy efficiency activities?**

22 A. The majority of the funding for energy efficiency is from the Idaho and Oregon  
23 Energy Efficiency Riders ("Rider") with a lesser amount funded through base rates.

24 **Q. What programs are funded through base rates?**

25 A. Idaho Power funds its low income weatherization program called Weatherization  
26 Assistance for Qualified Customers through base rates.

1 **Q. Does the Company participate in or offer energy efficiency related activities**  
2 **other than the programs you mentioned?**

3 A. Yes. The Company sponsors and participates in many organizations and community  
4 events that are directly related to energy efficiency efforts. For example, the  
5 Company is an active participant in the Northwest Power and Conservation Council's  
6 Regional Technical Forum, Northwest Energy Efficiency Alliance, and the  
7 Consortium for Energy Efficiency. Company employees participate in many trade  
8 shows and community events such as the Malheur County Fair, Treasure Valley  
9 Energy Efficiency and Renewable Conference, Western Treasure Valley Electrical  
10 Plan Meeting, home and garden shows, agricultural shows, and have presented to  
11 many various civic and community groups.

12 **Q. Is there opportunity for public input to the Company's energy efficiency**  
13 **planning process?**

14 A. Yes. Idaho Power relies on the input of the Energy Efficiency Advisory Group  
15 ("EEAG") to provide customer and public interest guidance on energy efficiency  
16 program design and implementation strategies. Currently, the EEAG consists of 14  
17 members from across Idaho Power's service area and the Pacific Northwest.  
18 Members represent a cross-section of customers, including individuals from the  
19 residential, industrial, commercial, and irrigation sectors, as well as representatives  
20 for senior citizens, individuals with limited income, environmental organizations, state  
21 agencies, public utility regulatory commissions, and Idaho Power.

22 The EEAG meets several times a year and has been instrumental in the  
23 development of Idaho Power's programs and studies since 2002. During the  
24 meetings, Idaho Power requests recommendations and input on new program  
25 proposals, marketing methods, and specific measure details; provides a status  
26 update on the Rider funding and expenses; provides updates about ongoing

1 programs and projects; and supplies general information on energy efficiency and  
2 demand response issues. Idaho Power relies on and values input from the EEAG to  
3 provide a broad customer and public interest review and perspective of energy  
4 efficiency and demand response programs and expenses.

5 **Q. Are Idaho Power's energy efficiency programs proving to be successful?**

6 A. Yes. Each program offered has provided benefits to customers and to the Company.  
7 Many programs provide monetary incentives to customers for participation, while  
8 others target educational efforts and long-term energy saving opportunities.  
9 Increased participation in the Company's programs results in wise use of resources  
10 and avoids or delays development of supply-side resources.

11 **Q. Do Idaho Power's energy efficiency activities affect customer satisfaction?**

12 A. Yes. Results of the Company's customer satisfaction surveys have shown a steady  
13 increase in customer satisfaction over recent years as the percentage of customers  
14 who have a positive perception of the Company's conservation efforts increased  
15 from 39 percent in early 2003 to 57 percent in late 2010. This represents a 46  
16 percent increase in positive customer perception over the past seven years.

17 **Q. Does Idaho Power support any programs for customers who are having  
18 difficulty paying their electricity bills?**

19 A. Yes. Project Share is a year-round energy assistance program which was initiated  
20 by Idaho Power in 1982. Project Share, which is administered by the Salvation  
21 Army, is funded by a combination of customer donations and Company shareholder  
22 funds. In addition, other utilities participate in this program with Idaho Power. Grants  
23 from this program can be used for the payment of electricity and gas bills, as well as  
24 wood, propane, oil, or coal heat.

25 During the last program year, more than 6,300 individuals in Idaho Power's  
26 communities used Project Share funds to keep their homes warm during cold winter



1 months and cool during hot summer days. In the last five program years ending May  
2 31, 2010, Idaho Power customers have contributed approximately \$950,000 and  
3 shareholders have contributed approximately \$350,000 to the program. In the  
4 2009/2010 program year (ending May 31, 2010), when customer contributions  
5 decreased, the Company significantly increased Company shareholder contributions  
6 to ensure that funding would not decline during a challenging economic climate.

7 **VI. CUSTOMER RELATIONS**

8 **Q. What is the Company's overall approach to customer relations?**

9 A. Idaho Power's vision is to be regarded as an exceptional utility. In order to  
10 accomplish this, the Company must provide superior and satisfying customer service  
11 that addresses its customers' needs and expectations. Toward this end, the  
12 Company continually works to assess customer concerns, identify performance gaps  
13 based on customer response, and to explore industry best practices to address  
14 those gaps.

15 **Q. What is the Company doing to address areas with opportunity for  
16 improvement?**

17 A. The Company's strategy for addressing areas of improvement involves integrating  
18 customer input into its processes, systems, and culture while utilizing technology to  
19 improve service. For example, as a result of customer input Idaho Power is working  
20 on improving system reliability and offering more automated customer service  
21 options.

22 **Q. What has Idaho Power done recently to improve system reliability in its  
23 Oregon service area?**

24 A. In 2010, per the Stipulation in Docket UM 1470 ("Stipulation"), the Company  
25 completed specific upgrades on its Brownlee-Ontario 230 kilovolt transmission line.  
26 The upgrades focused on a three-pole structure that had been identified by the

1 Company as the source of faults that may have impacted the power quality at the  
2 H.J. Heinz Ore-Ida Potato Products facility in Ontario. Also per the Stipulation, the  
3 Company has installed two fault-locating relays on the Emmett-Ore-Ida Ontario 69  
4 kilovolt transmission line. These relays were installed at the Emmett and Ore-Ida  
5 substation terminals on the line.

6 In 2010, Idaho Power installed its first circuit breaker outside the fences of a  
7 substation, the HRJA R2 Breaker near Harper, Oregon. The breaker will function as  
8 a reclosure on the 69 kilovolt line to the Drewsey area and will improve reliability in  
9 the Vale area. This innovative project saves money because estimated project costs  
10 are about one-third of a substation.

11 **Q. What are Idaho Power's system reliability results in Oregon?**

12 A. 2010 results for the reliability indices of System Average Interruption Duration Index,  
13 System Average Interruption Frequency Index, and Momentary Average Interruption  
14 Frequency Index remained below threshold as reflected in the *2010 Electric Service*  
15 *Reliability Annual Report* filed with the Commission and attached as Exhibit 301.

16 **Q. Please describe Idaho Power's continuing practice of surveying customer**  
17 **satisfaction.**

18 A. Idaho Power has contracted with Burke, Inc. ("Burke") to conduct quarterly customer  
19 relationship surveys since 1995. Burke is a full-service customer market research  
20 and decision support company headquartered in Cincinnati, Ohio, with regional  
21 offices throughout the United States. The Burke surveys represent Idaho Power's  
22 primary customer satisfaction research. In addition to the Burke surveys, Idaho  
23 Power acquires the results of the annual J.D. Power and Associates Electric Utility  
24 Residential Customer Satisfaction Study ("J.D. Power Study"). The J.D. Power  
25 Study is used primarily as a benchmark to other electric utilities. As its name implies,  
26 the J.D. Power Study is for residential customers only, as the number of Idaho Power

1 commercial customers is not large enough at this point in time to qualify for a  
2 subscription to the J.D. Power Study. Idaho Power ranked in the top quartile of the  
3 124 utilities in the 2011 J.D. Power Study. Moreover, in that same study, Idaho  
4 Power ranked highest of *all* utilities included in the study for the fourth year in a row  
5 for providing customers the information they want, and need, regarding outages.  
6 Idaho Power also utilizes customer focus groups for project-specific qualitative  
7 research when the situation is appropriate.

8 **Q. Please describe the Company's customer satisfaction performance results in**  
9 **recent years.**

10 A. I am proud to say that based on the Burke surveys, Idaho Power customers'  
11 satisfaction remains at a consistently high level. In addition, the Company is  
12 experiencing levels of customer satisfaction that are significantly higher than when it  
13 began measuring in 1995. Results of the 2011 J.D. Power Study also reflected very  
14 consistent and improved performance by Idaho Power with regard to residential  
15 customer satisfaction in all components of the J.D. Power customer satisfaction  
16 index, including power quality and reliability, price, billing and payment, corporate  
17 citizenship, communications, and customer service.

18 **Q. Please summarize the Burke methodology and the resulting information made**  
19 **available to the Company.**

20 A. On a quarterly basis, Idaho Power receives results from Burke based on customer  
21 interviews. Quarterly results include an overall index score, referred to as the  
22 Customer Relationship Index ("CRI"), as well as more detailed information in the  
23 form of average response data collected for numerous questions in six general  
24 categories: (1) Company Image; (2) Quality of Service; (3) Cost and Pricing; (4)  
25 Responsiveness to Customers; (5) Communication; and (6) Billing and Payment.  
26

1 **Q. What is Idaho Power's primary way of measuring its success in providing**  
2 **customer satisfaction?**

3 A. Idaho Power's primary measure for customer satisfaction is the CRI derived by  
4 Burke from quarterly customer surveys. The CRI is based on research that is  
5 conducted at various points in time throughout the year. This reduces the potential  
6 for any one event or circumstance to have a significant influence, either good or bad,  
7 on the overall customer satisfaction levels. It is a statistically reliable measurement  
8 of customer opinions and it provides a historical trend that allows the Company to  
9 track its performance over time. The CRI is the best single satisfaction measure  
10 available to Idaho Power because it depicts the customers' overall attitudes toward  
11 the Company in five distinct criteria. The CRI is comprised of five key questions  
12 where a rating ranging from zero (very dissatisfied) to four (very satisfied) is given for  
13 a maximum of 20 points possible among all five questions. The following are the five  
14 criteria questions that are asked in the quarterly customer surveys:

15 (1) What is your overall level of satisfaction with Idaho  
16 Power?

17 (2) How much do you agree or disagree that the  
18 overall quality of the electricity and customer service and  
support you get from Idaho Power is excellent?

19 (3) Thinking about the price you pay, how much do you  
20 agree or disagree that the overall value of the electricity  
and customer service and support you get from Idaho  
Power is excellent?

21 (4) If asked (by a neighbor new to your area, by a  
22 company that just moved into the area, by an irrigator new  
to your area,) how likely would you be to tell them that  
23 Idaho Power is a good company to work with?

24 (5) How much do you agree or disagree that Idaho  
25 Power cares about you as a customer and has done  
everything possible to earn your loyalty?

26

1 Responses for each customer are totaled and divided by the maximum  
2 possible points to establish a percentage CRI score. The CRI can range from a  
3 minimum of zero to a maximum of 100 percent.

4 **Q. Would you please describe the Company's customer satisfaction**  
5 **performance?**

6 A. Idaho Power achieved a CRI of 82.30 for the 12 months ending the fourth quarter of  
7 2010. According to Burke, a score of 82.30 signifies that overall customers have  
8 very strong positive attitudes towards Idaho Power and the level and quality of  
9 service it provides. Overall, the level of customer satisfaction has remained fairly  
10 consistent since the 12 months ending the fourth quarter of 2008.

#### 11 **VII. CUSTOMER SERVICE**

12 **Q. Would you please briefly describe Idaho Power's Customer Service**  
13 **organization?**

14 A. Idaho Power operates a centralized Customer Service Center that provides  
15 customers with full service access to CSRs weekdays from 7:30 a.m. to 6:30 p.m.  
16 and outage and emergency access to Outage Specialists twenty-four hours a day,  
17 seven days a week. Idaho Power employs bilingual CSRs that provide service to the  
18 Company's Spanish-speaking customers. Additionally, the Company utilizes a third-  
19 party language service to help it communicate with other non-English speaking  
20 customers. On average, approximately 1.2 million inbound customer calls are  
21 received by the Customer Service Center each year.

22 In addition to the services provided by CSRs during business hours and by  
23 Outage Specialists 24 hours a day, 7 days a week, Idaho Power also provides its  
24 customers access to account and outage information 24 hours a day, 7 days a week  
25 through an Interactive Voice Response ("IVR") unit. Through the IVR, customers can  
26 make payment arrangements; retrieve billing, payment, and meter reading

1 information; sign up for Budget Pay; access energy efficiency and usage information;  
2 and receive information on outages. Account access is available 24 hours a day via  
3 the Company's secure website. This allows customers the same "self-help" options  
4 available through the IVR, plus the ability to start and stop service and engage in an  
5 energy usage analysis for their home or small business.

6 **Q. You mentioned Idaho Power was undertaking several customer-oriented**  
7 **initiatives. Do any of these initiatives directly impact the way Idaho Power**  
8 **delivers customer service?**

9 A. Yes. The Company is implementing a new Customer Service Call Management  
10 System. This system provides several new features to customers including a "virtual  
11 hold" option through the IVR and a "call me" option through Idaho Power's website.  
12 In addition, it allows for more sophisticated proactive dialing campaigns, improved  
13 efficiency in employee scheduling, greater data analysis capability, and improved  
14 quality assurance monitoring.

15 **Q. Are there any other customer service initiatives being undertaken?**

16 A. Yes. The Company has heard from its customers that they would like a no-fee, on-  
17 line bank debiting payment option. In response to this feedback, the Company is  
18 developing a no-fee bill payment option to be available to customers who utilize its  
19 Account Manager functionality on its website. This option, which is scheduled to be  
20 available in August 2011, will allow customers to schedule no-fee electronic  
21 payments from their checking or savings account. This payment option will provide  
22 more flexibility and convenience to customers and is expected to reduce overall  
23 payment processing costs as customers who currently use pay stations for same-day  
24 payments will have the ability to make those payments without leaving their homes  
25 or businesses.

26

1 **Q. You mentioned earlier that Idaho Power is committed to providing superior**  
2 **service to its customers. Do you believe the initiatives undertaken within your**  
3 **Customer Operations organization meet this commitment?**

4 A. Yes. Idaho Power is committed to providing superior service to its customers in all  
5 facets of its business. I believe the organizational changes made over the past few  
6 years as well as the initiatives completed and currently underway demonstrate Idaho  
7 Power's commitment to its customers to provide superior and satisfying service.

8 **Q. In your opinion, should the Company's requested rate increase be viewed as**  
9 **reasonable based upon the Company's customer service and customer**  
10 **satisfaction performance?**

11 A. Yes. By providing the Company with fair and timely recovery of its revenue  
12 requirement, the Commission will be recognizing that the Company has adequately  
13 addressed customer needs and that the Company's investments that support  
14 customer service and satisfaction have been appropriately incurred on behalf of  
15 customers.

16 **Q. Does this conclude your direct testimony in this case?**

17 A. Yes, it does.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Warren Kline  
Idaho Power Company 2010 Electric Service Reliability Annual Report

July 29, 2011



## **Idaho Power Company 2010 Electric Service Reliability Annual Report**

This document is written to present Idaho Power Company's 2010 Electric Service Reliability Annual Report. The report discusses the performance of Idaho Power Company's Oregon electric service through a narrative summary as well as attached tables and charts.

At the end of 2010, Idaho Power served 19,409 customers from 62 distribution circuits in the far central-eastern portion of Oregon.

The composite performance of the 62 circuits in 2010 included 863 sustained (>5 minutes) interruptions, 636 momentary events, 91,430.82 customer hours out, a SAIDI of 4.98, a SAIFI of 1.62 and a MAIFI<sub>E</sub> of 3.78.

SAIFI remained below threshold for interruptions by 2.1% in 2010. SAIDI was below threshold for customer hours out by 0.81% and MAIFI<sub>E</sub> momentary interruptions were below threshold by 2.61%. We continue to gather more momentary data through the Sentry units but with the drawback of only an Unknown cause.

Attached System CHARTS & TABLES show Oregon system performance (all of IPC's 62 Oregon circuits) over 5 years for the reliability indices of SAIDI, SAIFI and MAIFI<sub>E</sub>. TABLE 1, TABLE 2 and TABLE 3 lists 5 years of circuit reliability and threshold data for the three reliability indices. TABLE 4 lists 2010 circuit data for the 3 reliability indices in descending order. CHARTS 1-3 provide graphic representation of the circuits in descending order for the 3 reliability indices. Also attached, are charts for each Oregon circuit by reliability index..

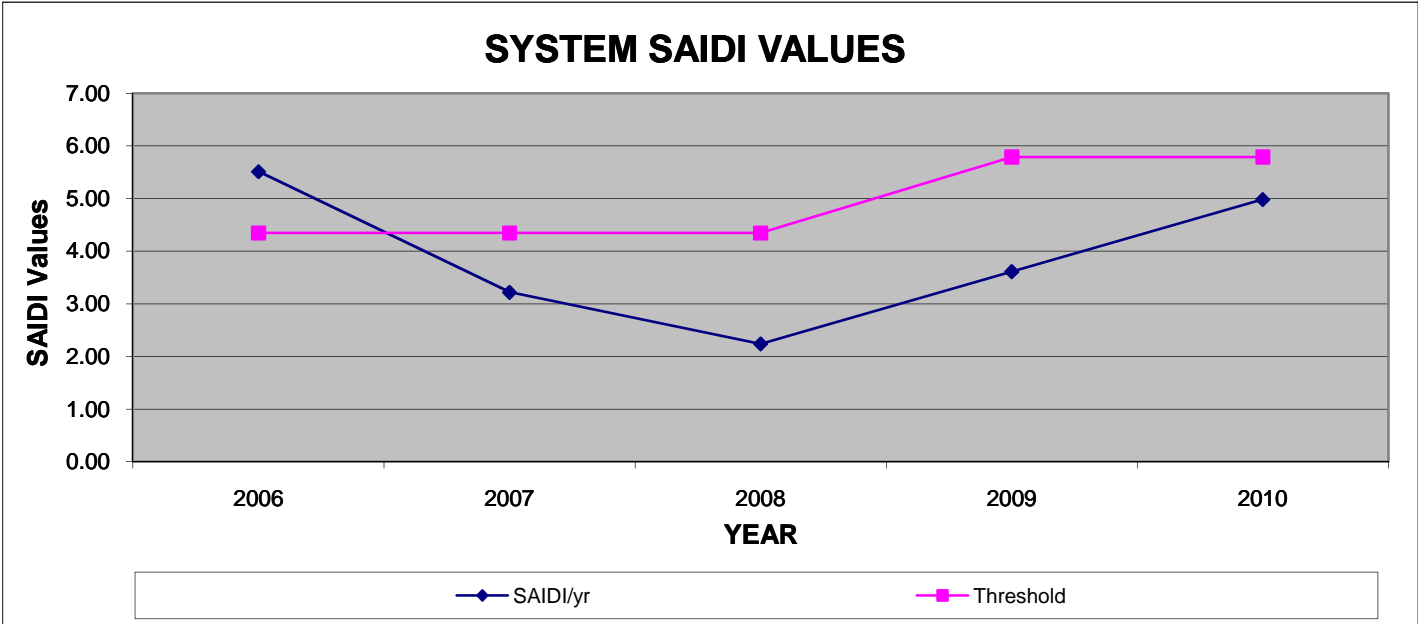
The top 5 causes of Idaho Power Company's sustained interruptions in 2010 were due to Unknown, Equipment Failure, Scheduled Outages, Adverse Environment and Foreign Interference. Please refer to TABLE 5 for a breakdown by cause and the associated number of occurrences for each cause as well as the percentage of the total for the last five years. TABLE 6 provides a ranking of the 2010 sustained interruption causes by occurrences and by customer hours without electricity service. The attached CHARTS for Interruption causes shows 5 years of system data for each of the 12 types of interruption causes. CHART 4 is a pie chart that shows the 12 types of sustained interruption causes as a percent of total.

TABLE 7 lists the circuits that exceeded the threshold level for any of the 3 reliability indices. Seven circuits exceeded their SAIDI threshold level, 3 circuits exceeded the SAIFI threshold level and 12 circuits exceeded the MAIFI<sub>E</sub> threshold level.

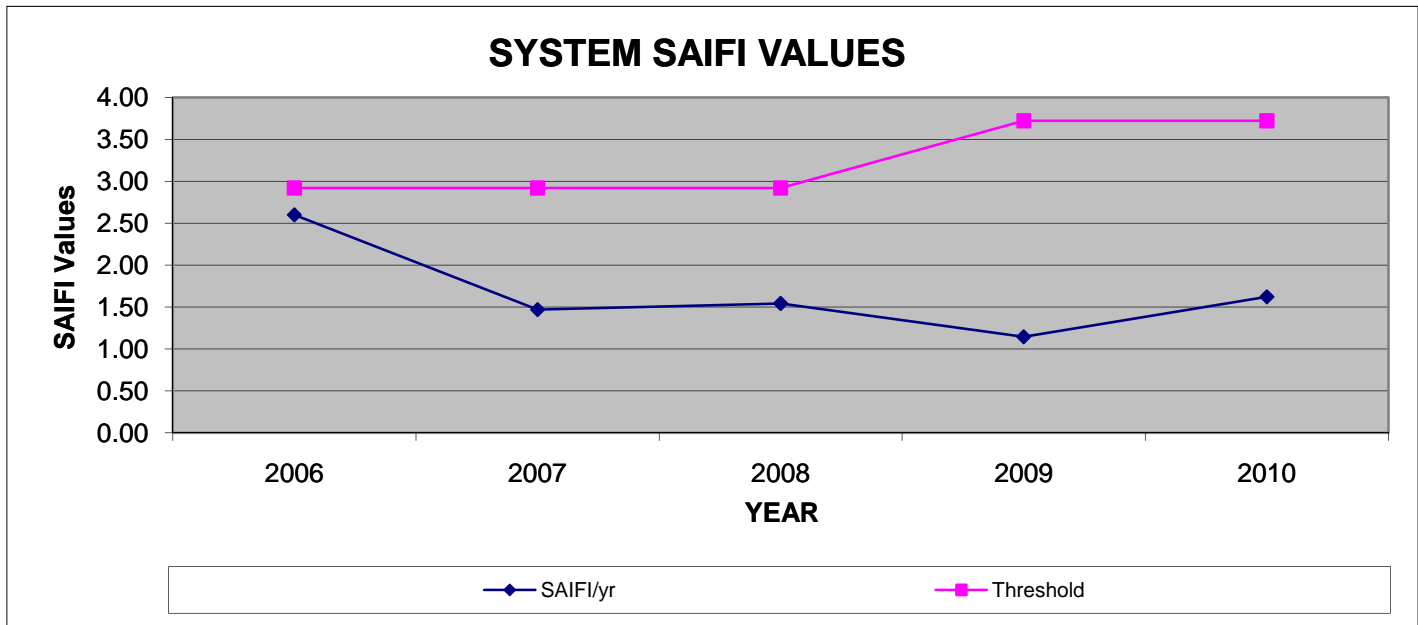
TABLE 8 provides 5 years of line/trench miles and customer count data. Data differentiating overhead from underground service is now available and is included in this table.

Idaho Power Company continues with periodic programs and projects to help improve customer service and electric service reliability. Some of the programs include our annual Oregon safety inspection/reliability patrols, line clearing program and annual maintenance projects.

5 Years of System Reliability Data and Associated Thresholds

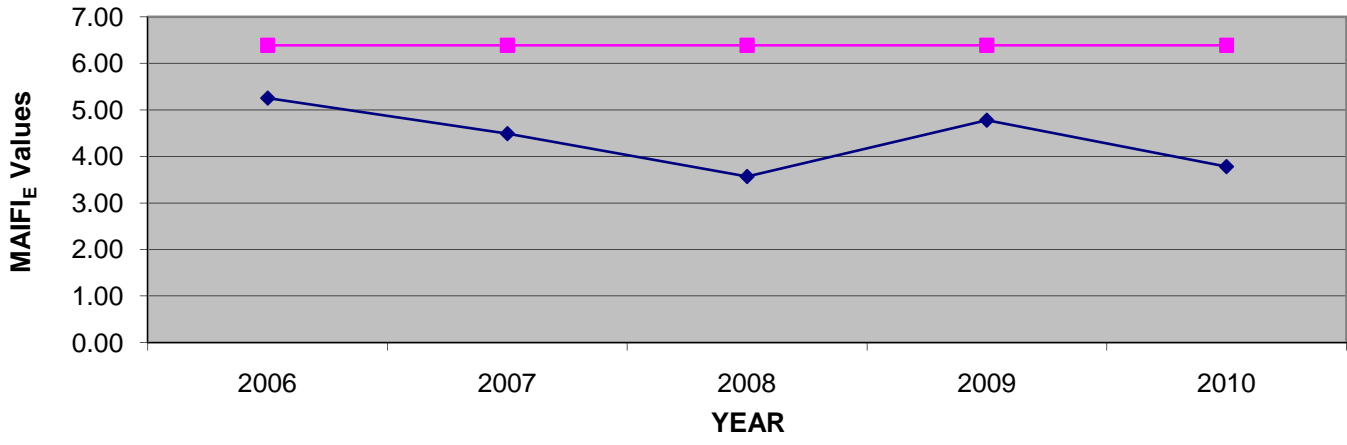


SYSTEM SAIDI VALUES					
2006	2007	2008	2009	2010	THRESHOLD
5.51	3.22	2.24	3.61	4.98	5.79



SYSTEM SAIFI VALUES					
2006	2007	2008	2009	2010	THRESHOLD
2.60	1.47	1.54	1.14	1.62	3.72

### SYSTEM MAIFI<sub>E</sub> VALUES



### SYSTEM MAIFI<sub>E</sub> VALUES

2006	2007	2008	2009	2010	THRESHOLD
5.25	4.49	3.57	4.78	3.78	6.39

## 5 Years of Circuit SAIDI Data and Associated Thresholds

Idaho Power/301  
Kline/4TABLE 1  
SAIDI Values

CIRCUIT	2006	2007	2008	2009	2010	THRESHOLD
CARO11	2.51	1.43	1.26	0.73	5.48	14.91
CARO12	6.28	0.90	4.02	0.13	0.94	6.86
CARO13	0.85	0.43	0.31	0.08	1.75	1.45
CWVY11	8.86	2.97	3.14	0.33	2.98	7.88
CWVY12	10.26	8.13	10.44	2.61	50.35	14.19
DRKE11	3.31	10.50	3.55	9.42	11.67	13.70
DUKE11	14.62	0.54	5.93	2.96	0.00	14.12
DWSY11	8.20	54.99	7.28	5.19	2.37	29.00
ESTN11	0.61	24.68	7.97	1.57	9.72	34.60
HCSU11	0.00	0.00	0.00	0.00	0.00	5.37
HFVY11	18.15	2.16	4.10	4.16	21.65	11.83
HFVY12	23.94	6.99	12.96	7.10	0.18	26.73
HGTN11	2.34	0.65	1.29	2.30	15.86	31.26
HGTN12	1.42	0.00	0.00	0.03	3.86	5.16
HMDL12	5.11	3.26	5.01	10.87	2.48	34.47
HOLY11	3.97	0.26	4.70	3.65	4.48	9.73
HOLY12	0.22	0.63	0.25	1.63	2.62	4.86
HOLY13	5.12	2.87	0.81	2.01	2.24	9.34
HOPE11	9.14	8.82	6.01	3.09	5.67	12.96
HRPR11	19.56	14.51	5.94	15.35	26.48	28.69
HRPR12	11.43	14.07	18.58	13.83	11.13	32.42
JMSN11	7.31	9.07	0.71	4.59	8.24	10.12
JMSN12	9.70	6.53	0.61	1.01	4.90	7.58
JNTA11	0.26	44.57	7.40	5.91	7.81	25.19
JNTA12	0.25	46.01	6.13	1.76	9.38	19.88
JNVY11	14.79	4.56	3.63	19.28	36.95	64.44
JNVY12	13.47	2.90	8.71	20.93	44.29	28.11
JNVY31	26.57	6.16	10.58	31.32	38.77	128.22
LIME11	8.42	9.85	0.71	7.05	15.90	51.54
LIME12	1.71	5.03	0.51	0.03	25.53	12.07
MRBT41	0.61	2.20	7.05	1.86	1.09	11.26
MRBT42	1.70	0.22	0.37	0.28	0.15	25.14
NYSA11	2.76	0.04	0.33	2.71	0.46	4.20
NYSA12	14.11	0.40	2.28	1.16	1.49	37.43
NYSA13	4.16	1.18	4.13	1.85	0.22	16.43
NYSA14	5.57	3.19	0.13	0.70	0.05	8.58
OBPR11	0.00	0.00	0.00	0.00	0.00	0.00
OBPR12	0.00	0.00	0.00	0.00	0.00	1.00
OIDA11	0.33	4.32	1.79	0.06	0.41	17.65
OIDA12	0.82	2.14	0.00	1.55	4.90	4.57
ONTO14	0.08	7.50	0.70	0.50	1.23	17.26
ONTO18	1.62	0.41	0.16	0.03	0.21	2.96
ONTO19	1.00	0.88	0.22	0.11	1.67	1.54
ONTO20	2.02	0.83	0.17	1.46	0.33	3.75
ONTO23	5.76	11.26	0.00	0.83	0.58	50.45
ONTO24	0.60	5.07	1.59	1.03	2.18	6.73
ONTO25	0.25	0.30	0.02	0.12	0.14	0.66
OYDM11	6.64	0.00	0.20	0.00	0.67	14.36
PNCK11	23.93	0.07	8.87	1.29	17.36	18.07
PNCK12	53.54	0.00	1.28	0.00	0.00	23.00
PRMA12					0.83	0.00
PRMA42	6.44	0.94	6.22	6.24	6.64	25.36
RKVL11	39.84	3.83	43.75	21.75	54.96	78.56
UNTY11	22.34	3.68	2.73	0.65	0.47	15.03
UNTY12	17.86	5.39	2.51	0.87	0.31	10.67
VALE11	0.59	0.67	0.37	0.29	0.75	4.37
VALE13	3.81	2.98	0.43	34.59	19.98	39.28
VALE14	4.12	6.95	0.48	0.92	2.67	20.45
VALE15	1.09	0.35	5.48	0.53	0.54	7.35
WESR13	5.68	0.85	0.22	7.79	1.52	33.48
WESR14	24.44	1.10	0.17	0.91	0.52	56.58
ADRN11				2.31	0.15	28.37
ADRN12				3.45	0.50	95.64

**TABLE 2**  
**SAIFI VALUES**

<b>CIRCUIT</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>THRESHOLD</b>
ADRN11				2.20	0.10	13.00
ADRN12				1.73	0.11	8.00
CARO11	0.77	1.52	2.67	0.47	4.47	9.50
CARO12	1.36	1.77	2.41	0.24	1.07	7.24
CARO13	0.99	0.15	2.06	0.05	1.07	3.14
CWVY11	3.17	1.02	2.02	0.13	0.27	3.21
CWVY12	3.21	2.43	2.66	0.73	3.17	3.65
DRKE11	1.28	3.91	1.04	5.30	4.35	6.49
DUKE11	6.74	0.96	1.70	2.31	0.00	7.09
DWSY11	3.14	8.58	4.95	3.25	1.29	8.77
ESTN11	0.33	3.00	3.00	1.00	7.00	6.00
HCSU11	0.00	0.00	0.00	0.00	0.00	3.00
HFWY11	8.52	1.09	2.08	1.50	5.14	7.30
HFWY12	9.80	3.07	6.07	2.46	0.11	11.48
HGTN11	1.38	0.27	0.29	1.02	3.29	5.78
HGTN12	1.07	0.00	0.00	0.01	1.14	2.05
HMDL12	3.40	2.46	3.61	7.60	2.34	22.56
HOLY11	2.38	0.19	3.28	3.33	3.14	6.79
HOLY12	0.06	0.33	0.20	1.17	3.27	4.34
HOLY13	0.58	0.47	0.65	1.31	2.42	3.58
HOPE11	3.82	5.55	4.46	3.20	2.24	7.44
HRPR11	6.12	6.17	4.12	3.21	8.06	9.12
HRPR12	3.47	5.87	5.07	3.52	4.37	8.07
JMSN11	2.46	2.25	1.26	2.26	3.77	4.40
JMSN12	5.53	2.10	1.19	0.52	1.48	5.36
JNTA11	0.08	5.88	4.25	2.27	3.42	6.56
JNTA12	0.06	7.45	2.88	1.12	4.30	6.02
JNVY11	4.55	1.24	1.16	6.26	8.19	19.99
JNVY12	3.94	1.16	3.24	6.12	7.56	8.88
JNVY31	6.26	1.92	1.67	8.59	8.26	30.10
LIME11	3.07	3.02	0.31	2.52	1.94	16.61
LIME12	0.78	1.79	0.29	0.04	5.04	4.80
MRBT41	0.45	2.32	0.59	0.39	1.22	2.89
MRBT42	1.11	0.89	0.20	0.20	0.10	3.32
NYSA11	3.52	0.02	1.10	1.86	0.77	4.52
NYSA12	7.08	1.10	2.58	1.20	0.95	23.14
NYSA13	4.62	1.56	3.94	1.95	0.16	15.90
NYSA14	2.60	2.65	0.99	1.17	0.03	5.62
OBPR11	0.00	0.00	0.00	0.00	0.00	0.00
OBPR12	0.00	0.00	0.00	0.00	0.00	1.00
OIDA11	0.14	2.37	0.80	0.03	0.66	9.67
OIDA12	1.00	2.00	0.00	1.00	4.00	4.00
ONTO14	0.19	2.38	0.98	1.00	1.00	7.55
ONTO18	1.62	0.90	0.18	0.04	0.10	3.32
ONTO19	0.25	0.82	0.16	0.05	0.53	1.00
ONTO20	0.28	1.00	0.07	0.12	0.21	1.40
ONTO23	1.95	3.70	0.00	1.98	1.02	17.38
ONTO24	0.33	3.22	1.31	0.50	1.90	4.51
ONTO25	0.87	0.24	0.01	0.04	0.09	1.33
OYDM11	1.68	0.00	0.23	0.00	0.27	5.70
PNCK11	7.51	0.05	4.32	0.61	3.95	7.77
PNCK12	7.00	0.00	1.00	0.00	0.00	5.50
PRMA12					0.50	0.00
PRMA42	8.19	1.15	4.37	3.94	3.16	17.64
RKVL11	4.67	1.38	6.79	5.96	6.28	10.84
UNTY11	7.95	1.14	2.13	0.19	0.16	5.97
UNTY12	5.61	1.89	2.03	0.22	0.82	4.28
VALE11	0.38	0.35	1.12	0.24	0.31	3.87
VALE13	1.61	1.61	1.23	0.49	3.58	3.57
VALE14	1.23	1.10	1.23	0.49	1.55	5.38
VALE15	0.63	1.03	3.10	0.24	0.23	4.26
WESR13	2.16	0.63	0.15	2.25	0.47	6.72
WESR14	7.47	2.05	0.08	0.22	0.35	12.62

TABLE 3

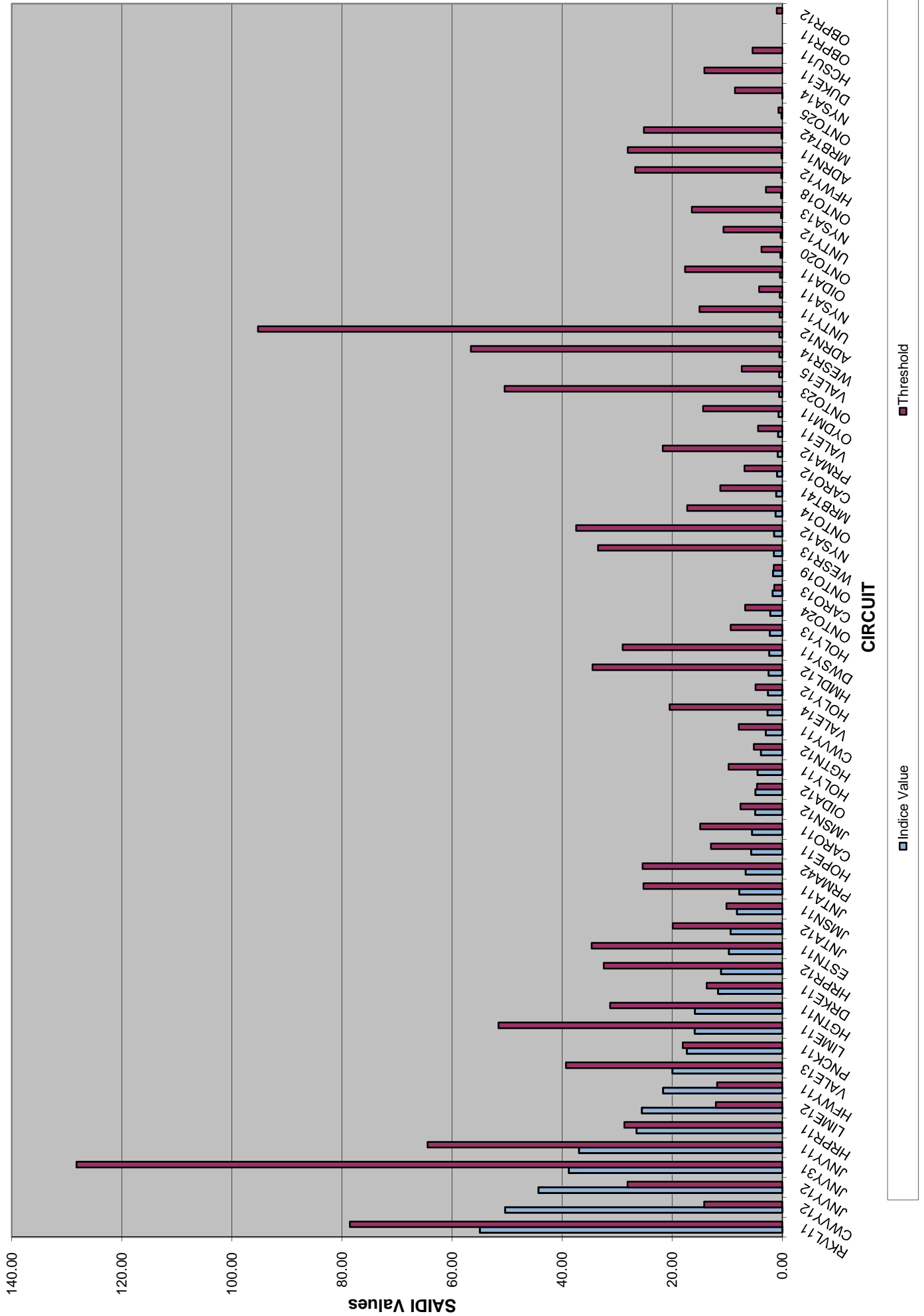
CIRCUIT	MAIFIE Values					THRESHOLD
	2006	2007	2008	2009	2010	
ADRN11				2.91	1.73	5.87
ADRN12				5.36	2.61	5.87
CARO11	9.13	3.09	3.91	3.04	2.81	15.33
CARO12	10.47	2.34	3.33	2.00	4.27	9.46
CARO13	4.00	1.11	3.00	4.00	3.00	6.99
CWVY11	11.00	8.96	10.00	10.00	7.00	13.00
CWVY12	20.90	15.26	10.55	9.98	11.62	13.45
DRKE11	15.01	6.00	2.00	19.13	6.04	8.00
DUKE11	3.00	10.04	6.00	6.00	2.00	12.91
DWSY11	44.71	10.06	16.76	5.87	19.53	20.84
ESTN11	2.00	2.00	0.00	0.00	0.00	12.13
HCSU11	0.00	0.00	0.00	0.00	0.00	4.00
HFVY11	22.78	11.18	5.27	9.50	15.60	14.95
HFVY12	13.32	13.11	9.03	8.79	9.20	14.81
HGTN11	13.90	3.06	2.11	4.10	1.20	6.78
HGTN12	7.00	2.00	1.00	2.00	0.00	4.00
HMDL12	3.32	7.00	11.80	40.98	20.03	5.00
HOLY11	5.00	2.03	4.00	3.00	1.00	6.00
HOLY12	5.00	0.00	5.00	2.00	1.00	5.00
HOLY13	5.12	3.14	6.16	5.28	1.49	4.80
HOPE11	32.26	10.33	17.00	6.00	22.17	24.29
HRPR11	32.56	10.89	14.30	7.00	17.00	21.50
HRPR12	65.79	14.81	21.64	7.65	23.07	22.95
JMSN11	18.00	11.00	9.00	14.00	13.00	13.00
JMSN12	18.50	9.57	8.38	9.93	6.00	13.62
JNTA11	28.33	7.14	18.00	4.00	19.00	19.95
JNTA12	40.92	6.56	16.00	4.00	20.00	18.97
JNVY11	12.26	6.43	9.22	12.45	6.36	12.00
JNVY12	10.00	6.00	10.00	22.00	14.00	9.00
JNVY31	55.03	9.77	11.81	24.03	19.54	10.00
LIME11	20.23	7.00	1.00	8.00	4.77	4.00
LIME12	13.65	4.66	1.27	2.00	2.35	3.00
MRBT41	4.00	4.00	4.00	11.00	5.00	9.69
MRBT42	8.00	3.00	7.00	3.00	0.00	6.00
NYSA11	0.79	1.00	1.00	0.00	0.60	5.00
NYSA12	8.12	2.19	5.78	4.62	1.08	9.70
NYSA13	2.25	3.29	1.86	0.07	0.00	5.87
NYSA14	2.90	1.75	1.00	0.39	1.00	3.00
OBPR11	0.00	0.00	0.00	3.59	3.59	2.00
OBPR12	0.00	0.00	0.00	0.00	0.00	2.00
OIDA11	2.00	5.17	5.19	0.00	1.30	5.00
OIDA12	1.00	1.00	0.00	0.00	1.00	7.00
ONTO14	1.00	1.00	0.00	2.00	1.00	13.00
ONTO18	0.00	1.00	1.00	4.00	1.00	5.00
ONTO19	2.27	3.02	1.00	2.00	6.00	7.99
ONTO20	2.00	2.00	0.00	5.17	1.00	9.03
ONTO23	4.00	5.00	3.63	0.00	1.00	9.00
ONTO24	6.21	7.19	3.00	2.00	14.00	7.81
ONTO25	3.00	1.99	3.63	17.45	1.00	5.00
OYDM11	8.00	2.00	9.45	0.00	0.00	1.88
PNCK11	19.91	8.84	0.00	8.70	6.23	19.66
PNCK12	0.00	4.00	34.96	20.00	0.00	14.00
PRMA12					0.00	0.00
PRMA42	8.66	4.65	4.00	14.07	9.00	10.00
RKVL11	11.00	6.00	14.13	10.07	11.00	3.00
UNTY11	15.06	9.25	12.90	3.27	14.00	13.00
UNTY12	29.36	8.95	3.00	6.61	7.56	13.38
VALE11	2.65	1.77	3.71	2.07	1.54	3.99
VALE13	11.10	7.36	4.00	2.70	10.37	5.82
VALE14	0.06	6.06	1.47	0.52	2.00	7.31
VALE15	9.29	1.00	3.00	1.00	0.67	5.23
WESR13	3.83	3.83	11.00	0.52	3.79	3.83
WESR14	10.00	10.00	3.79	1.00	1.00	10.00

TABLE 4

CIRCUIT	SAIDI	THLD	CIRCUIT	SAIFI	THLD	CIRCUIT	MAIFI <sub>E</sub>	THLD
RKVL11	54.96	78.56	JNVY31	8.26	30.10	HRPR12	23.07	22.95
CWVY12	50.35	14.19	JNVY11	8.19	19.99	HOPE11	22.17	24.29
JNVY12	44.29	28.11	HRPR11	8.06	9.12	HMDL12	20.03	5.00
JNVY31	38.77	128.22	JNVY12	7.56	8.88	JNTA12	20.00	18.97
JNVY11	36.95	64.44	ESTN11	7.00	6.00	JNVY31	19.54	10.00
HRPR11	26.48	28.69	RKVL11	6.28	10.84	DWSY11	19.53	20.84
LIME12	25.53	12.07	HFVY11	5.14	7.30	JNTA11	19.00	19.95
HFVY11	21.65	11.83	LIME12	5.04	4.80	HRPR11	17.00	21.50
VALE13	19.98	39.28	CARO11	4.47	9.50	HFVY11	15.60	14.95
PNCK11	17.36	18.07	HRPR12	4.37	8.07	JNVY12	14.00	9.00
LIME11	15.90	51.54	DRKE11	4.35	6.49	ONTO24	14.00	7.81
HGTN11	15.86	31.26	JNTA12	4.30	6.02	UNTY11	14.00	13.00
DRKE11	11.67	13.70	OIDA12	4.00	4.00	JMSN11	13.00	13.00
HRPR12	11.13	32.42	PNCK11	3.95	7.77	CWVY12	11.62	13.45
ESTN11	9.72	34.60	JMSN11	3.77	4.40	RKVL11	11.00	3.00
JNTA12	9.38	19.88	VALE13	3.58	3.57	VALE13	10.37	5.82
JMSN11	8.24	10.12	JNTA11	3.42	6.56	HFVY12	9.20	14.81
JNTA11	7.81	25.19	HGTN11	3.29	5.78	PRMA42	9.00	10.00
PRMA42	6.64	25.36	HOLY12	3.27	4.34	UNTY12	7.56	13.38
HOPE11	5.67	12.96	CWVY12	3.17	3.65	CWVY11	7.00	13.00
CARO11	5.48	14.91	PRMA42	3.16	17.64	JNVY11	6.36	12.00
JMSN12	4.90	7.58	HOLY11	3.14	6.79	PNCK11	6.23	19.66
OIDA12	4.90	4.57	HOLY13	2.42	3.58	DRKE11	6.04	8.00
HOLY11	4.48	9.73	HMDL12	2.34	22.56	JMSN12	6.00	13.62
HGTN12	3.86	5.16	HOPE11	2.24	7.44	ONTO19	6.00	7.99
CWVY11	2.98	7.88	LIME11	1.94	16.61	MRBT41	5.00	9.69
VALE14	2.67	20.45	ONTO24	1.90	4.51	LIME11	4.77	4.00
HOLY12	2.62	4.86	VALE14	1.55	5.38	CARO12	4.27	9.46
HMDL12	2.48	34.47	JMSN12	1.48	5.36	WESR13	3.79	3.83
DWSY11	2.37	29.00	DWSY11	1.29	8.77	OBPR11	3.59	2.00
HOLY13	2.24	9.34	MRBT41	1.22	2.89	CARO13	3.00	6.99
ONTO24	2.18	6.73	HGTN12	1.14	2.05	CARO11	2.81	15.33
CARO13	1.75	1.45	CARO12	1.07	7.24	ADRM12	2.61	5.87
ONTO19	1.67	1.54	CARO13	1.07	3.14	LIME12	2.35	3.00
WESR13	1.52	33.48	ONTO23	1.02	17.38	DUKE11	2.00	12.91
NYSA12	1.49	37.43	ONTO14	1.00	7.55	VALE14	2.00	7.31
ONTO14	1.23	17.26	NYSA12	0.95	23.14	ADRN11	1.73	5.87
MRBT41	1.09	11.26	UNTY12	0.82	4.28	VALE11	1.54	3.99
CARO12	0.94	6.86	NYSA11	0.77	4.52	HOLY13	1.49	4.80
PRMA12	0.83	0.00	OIDA11	0.66	9.67	OIDA11	1.30	5.00
VALE11	0.75	4.37	ONTO19	0.53	1.00	HGTN11	1.20	6.78
OYDM11	0.67	14.36	PRMA12	0.50	14.63	NYSA12	1.08	9.70
ONTO23	0.58	50.45	WESR13	0.47	0.00	HOLY11	1.00	6.00
VALE15	0.54	7.35	WESR14	0.35	0.00	HOLY12	1.00	5.00
WESR14	0.52	56.58	VALE11	0.31	3.87	NYSA14	1.00	3.00
ADRN12	0.50	95.64	CWVY11	0.27	3.21	OIDA12	1.00	7.00
UNTY11	0.47	15.03	OYDM11	0.27	5.70	ONTO14	1.00	13.00
NYSA11	0.46	4.20	VALE15	0.23	4.26	ONTO18	1.00	5.00
OIDA11	0.41	17.65	ONTO20	0.21	1.40	ONTO20	1.00	9.03
ONTO20	0.33	3.75	NYSA13	0.16	15.90	ONTO23	1.00	9.00
UNTY12	0.31	10.67	UNTY11	0.16	5.97	ONTO25	1.00	5.00
NYSA13	0.22	16.43	HFVY12	0.11	11.48	WESR14	1.00	10.00
ONTO18	0.21	2.96	ADRN12	0.11	8.00	VALE15	0.67	5.23
HFVY12	0.18	26.73	ADRN11	0.10	0.00	NYSA11	0.60	5.00
ADRN11	0.15	28.37	ONTO18	0.10	3.32	ESTN11	0.00	12.13
MRBT42	0.15	25.14	MRBT42	0.10	3.32	HCSU11	0.00	4.00
ONTO25	0.14	0.66	ONTO25	0.09	1.33	HGTN12	0.00	4.00
NYSA14	0.05	8.58	NYSA14	0.03	5.62	MRBT42	0.00	6.00
DUKE11	0.00	14.12	DUKE11	0.00	7.09	NYSA13	0.00	5.87
HCSU11	0.00	5.37	HCSU11	0.00	3.00	OBPR12	0.00	2.00
OBPR11	0.00	0.00	OBPR11	0.00	0.00	OYDM11	0.00	1.88
OBPR12	0.00	1.00	OBPR12	0.00	1.00	PNCK12	0.00	14.00
PNCK12	0.00	23.00	PNCK12	0.00	5.50	PRMA12	0.00	0.00

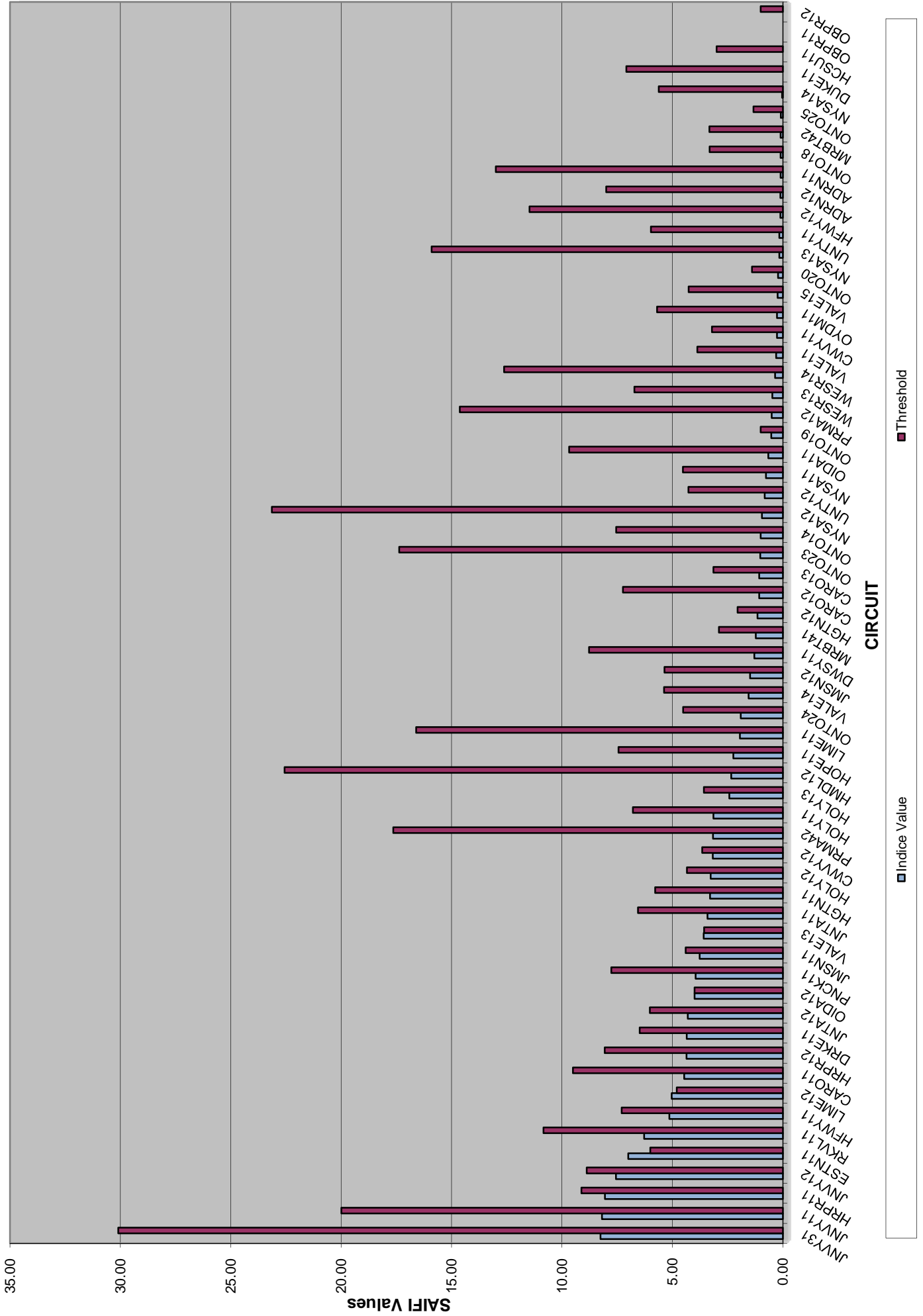
# 2010 Circuit SAIDI Values CHART 1

Idaho Power/301  
Kline/8

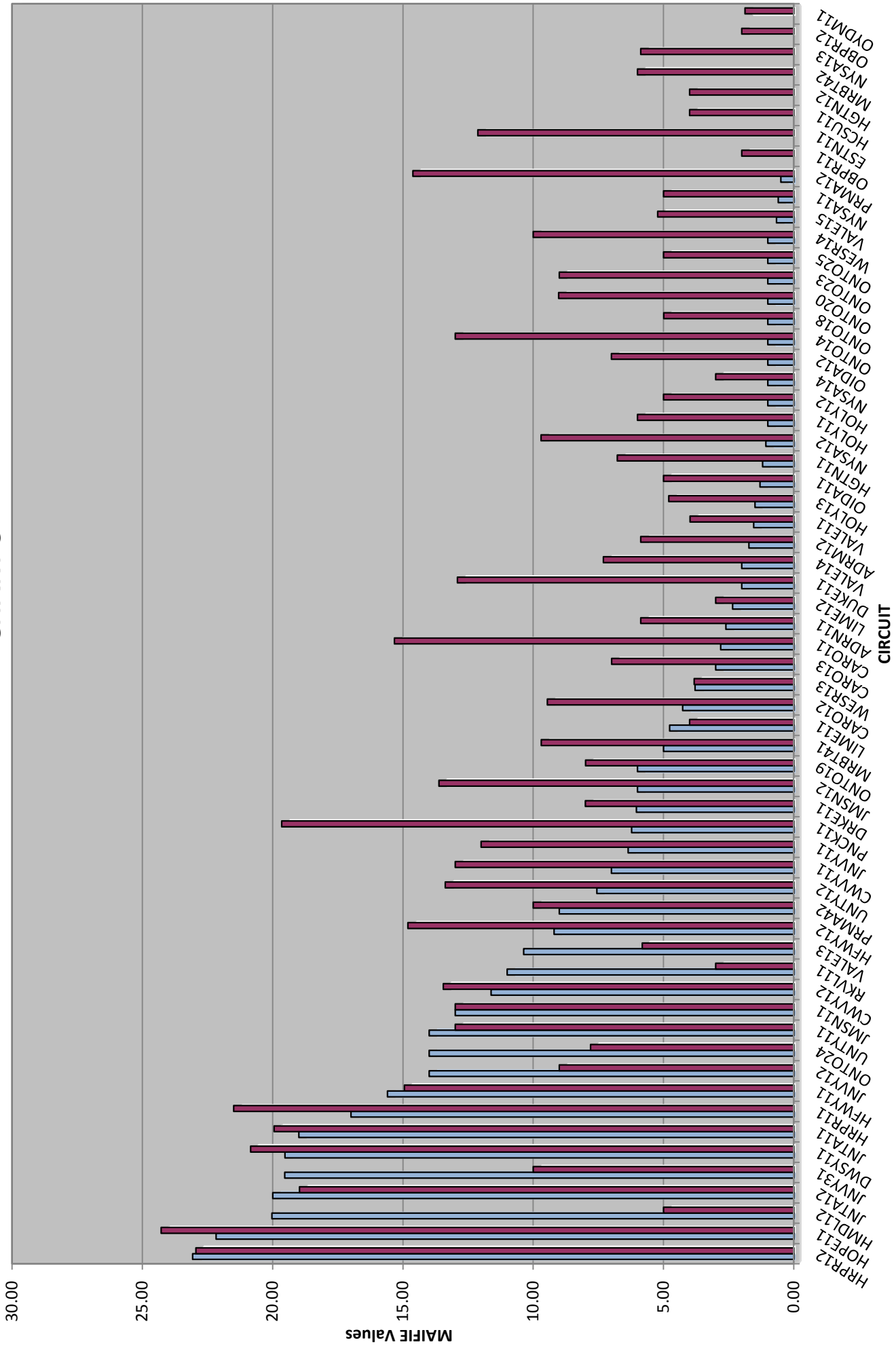




2010 Circuit SAIFI Values  
CHART 2

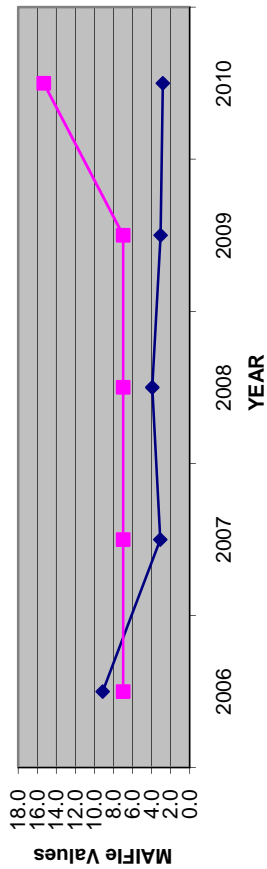


# 2010 Circuit MAIFle Values CHART 3

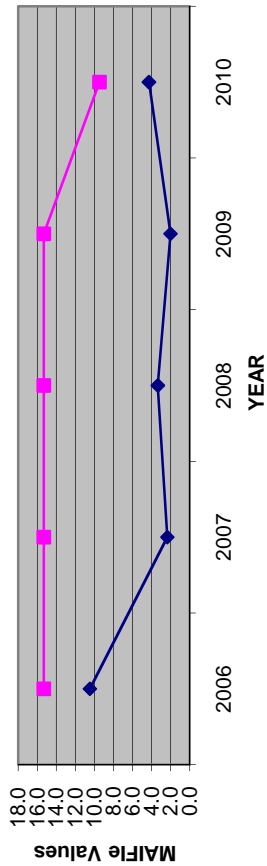


■ Index ■ Threshold

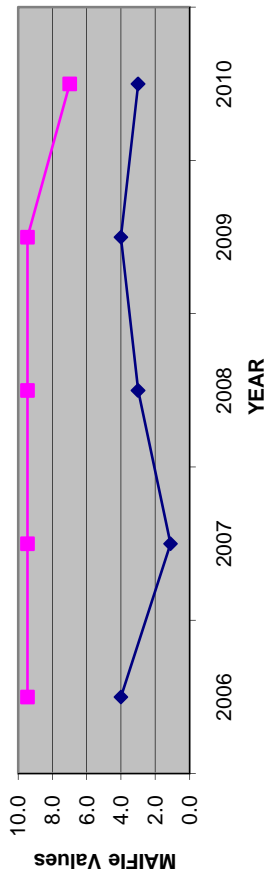
MAIFle Values For CARO11



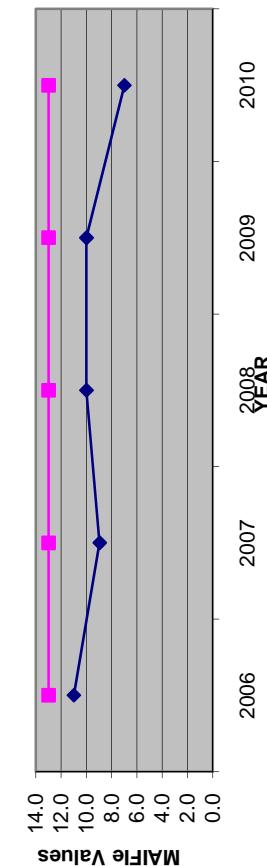
MAIFle Values For CARO12



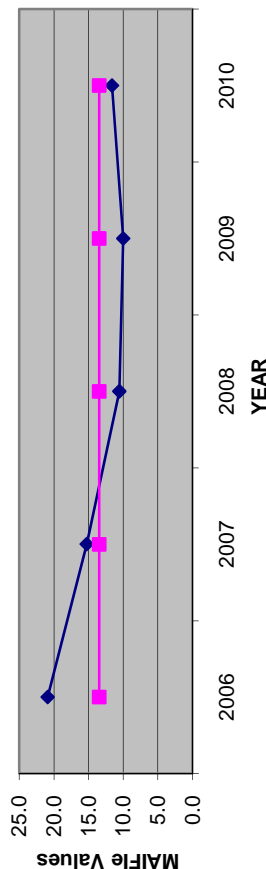
MAIFle Values For CARO13



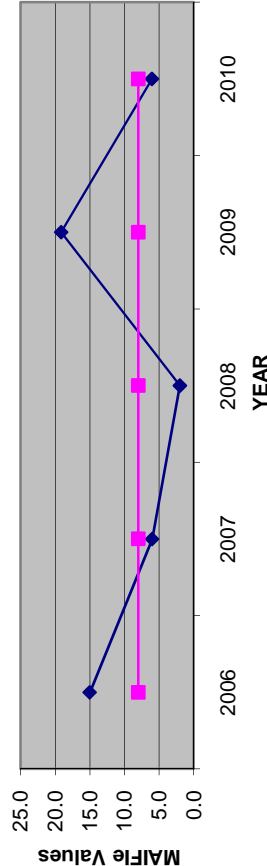
MAIFle Values For CWVY11



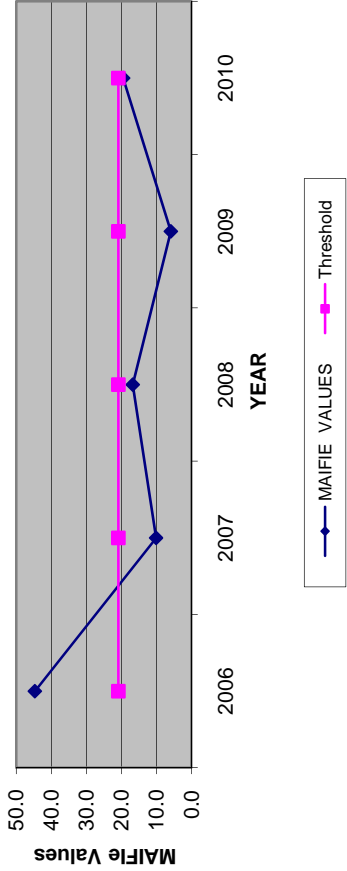
MAIFle Values For CWVY12



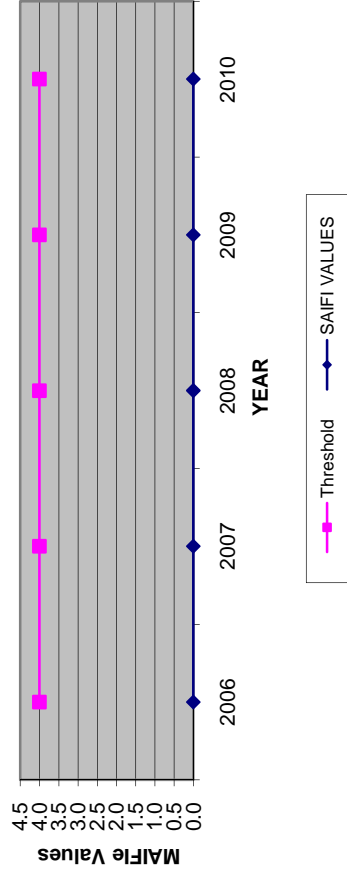
MAIFle Values For DRKE11



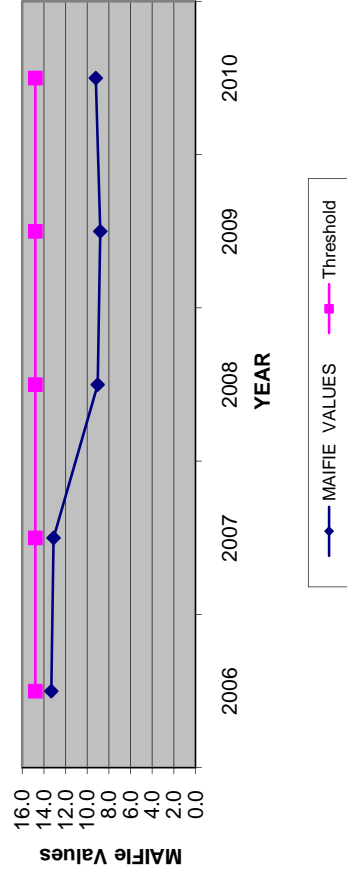
MAIFle Values For DWSY11



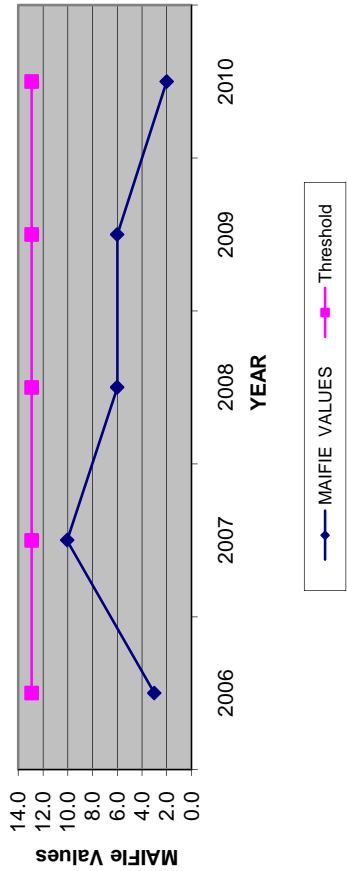
MAIFle Values For HCSU11



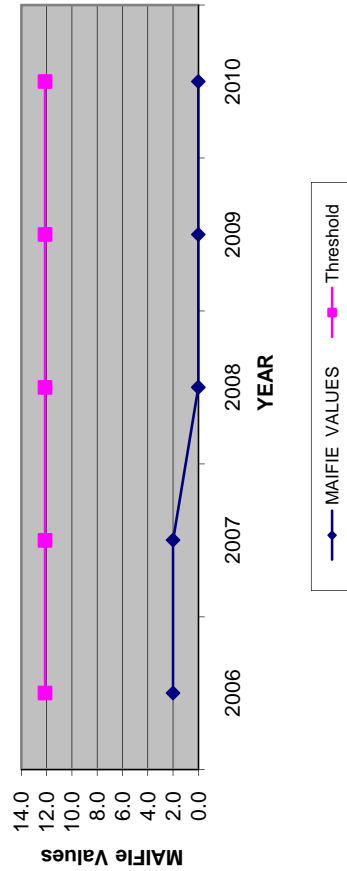
MAIFle Values For HFWY12



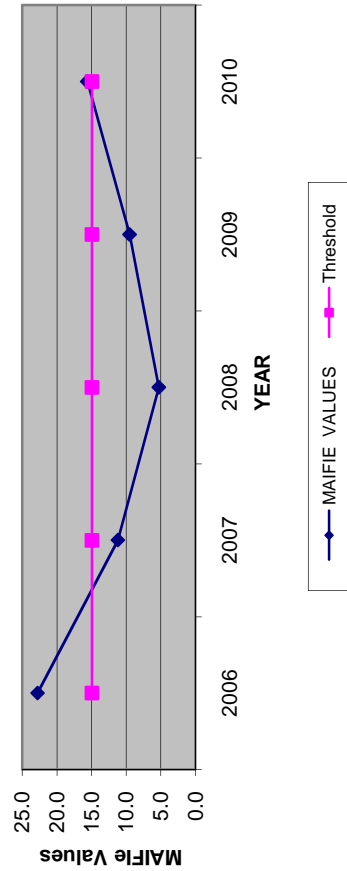
MAIFle Values For DUKE11



MAIFle Values For ESTN11



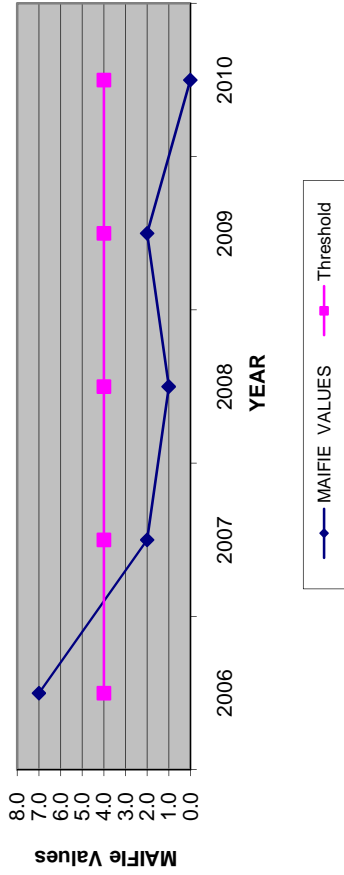
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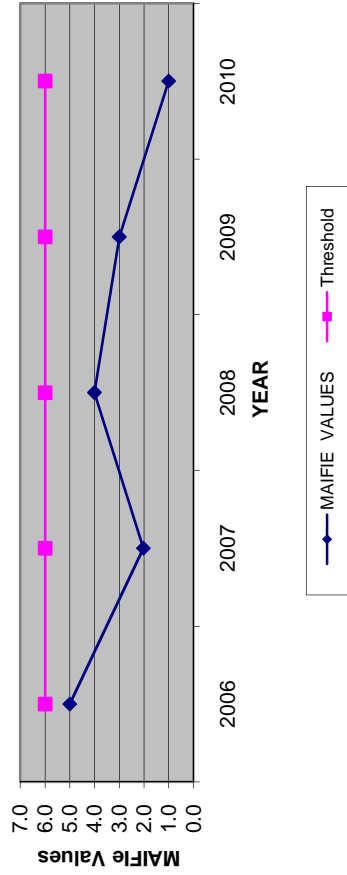
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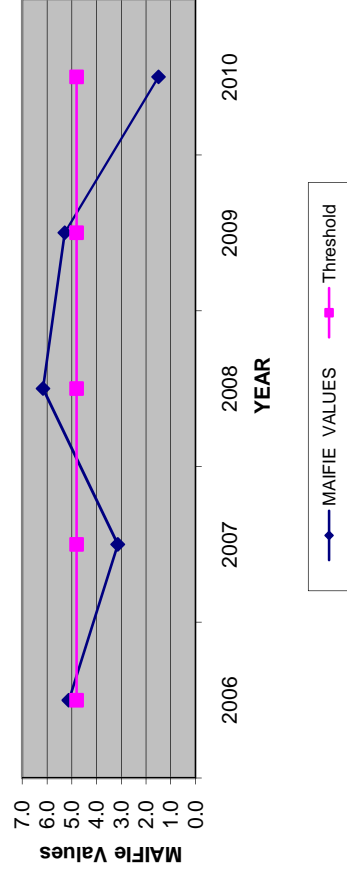
MAIFle Values For HGTN12



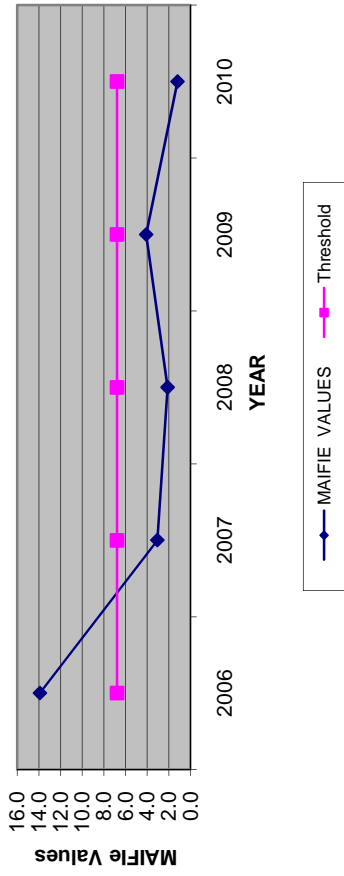
MAIFle Values For HOLY11



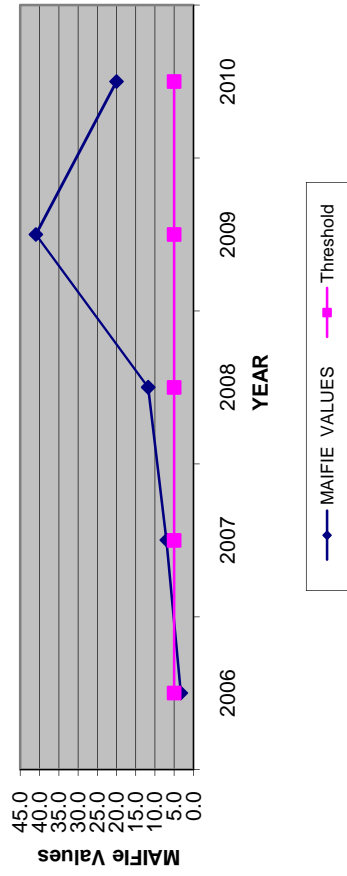
MAIFle Values For HOLY13



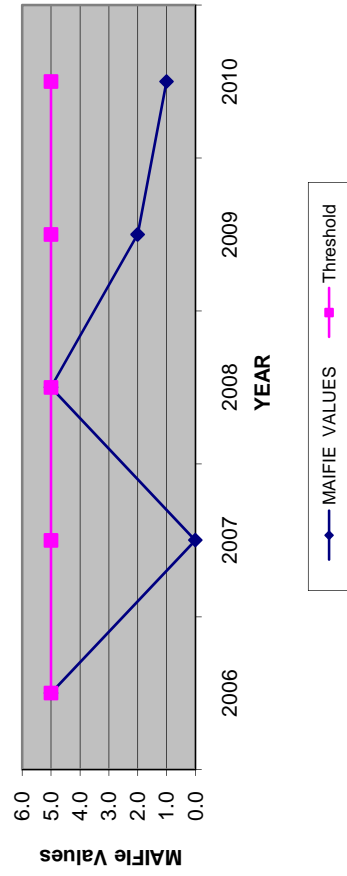
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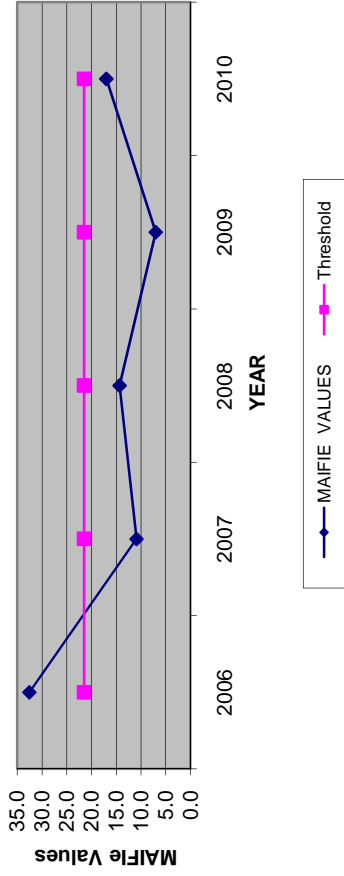
MAIFle Values For HMDL12



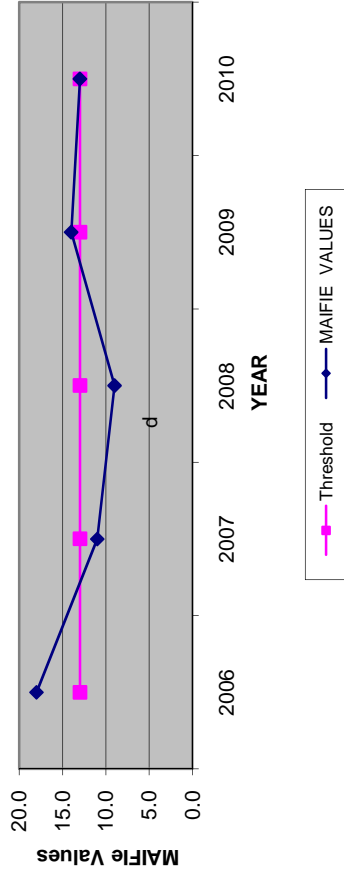
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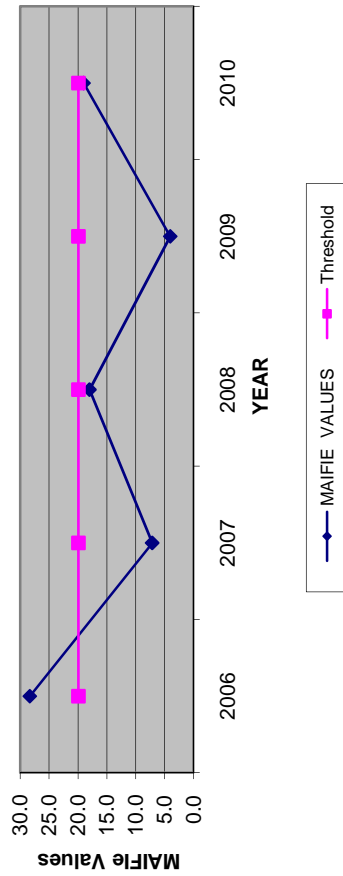
MAIFle Values For HRPR11



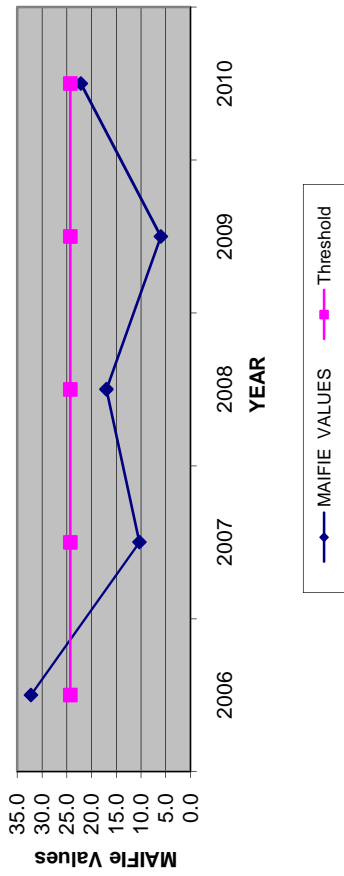
MAIFle Values For JMSN11



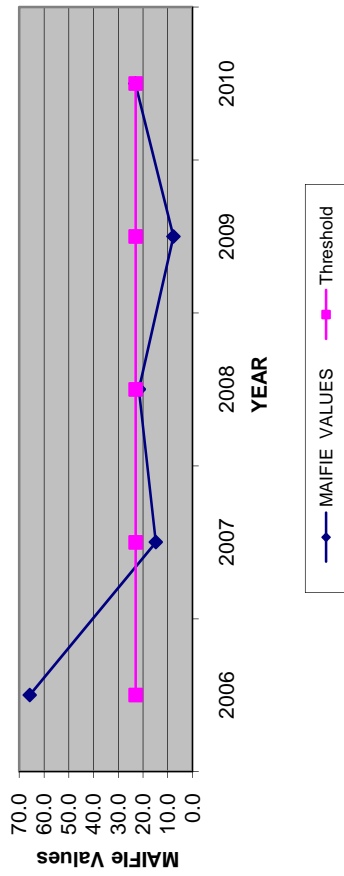
MAIFle Values For JNTA11



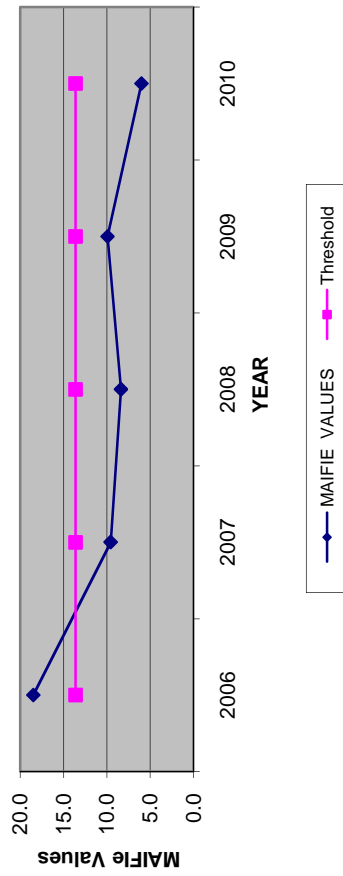
MAIFle Values For HOPE11



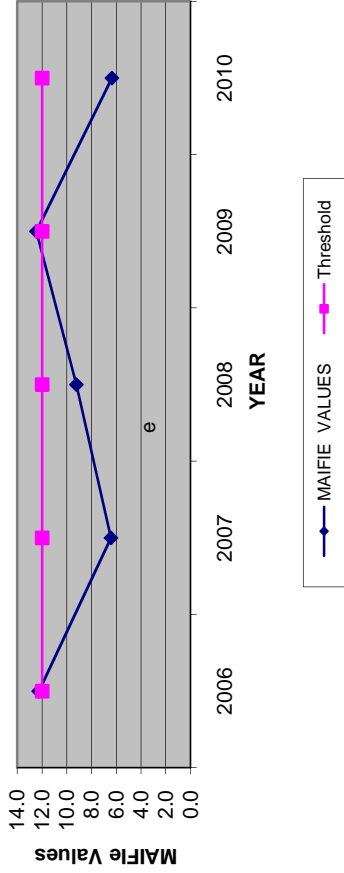
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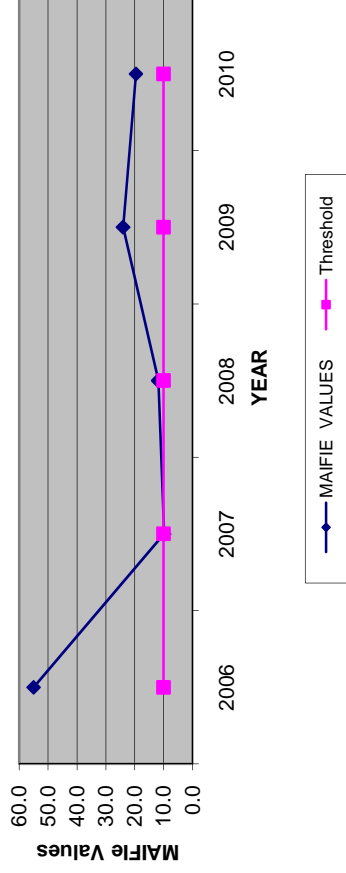
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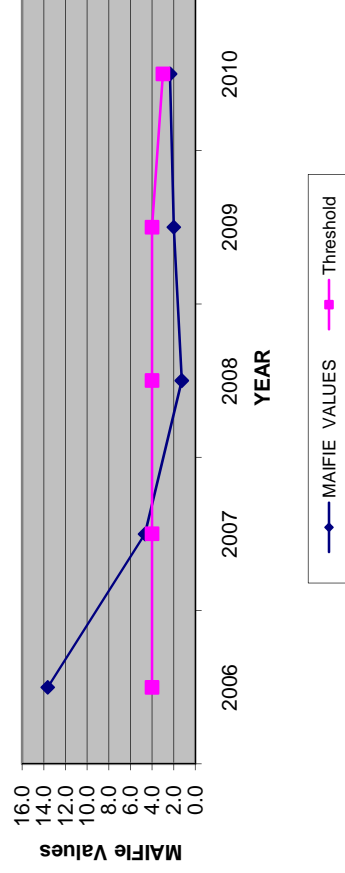
MAIFe Values For JNVY11



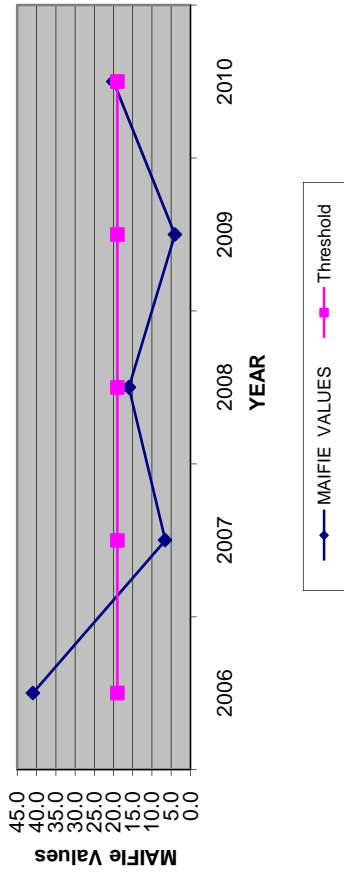
MAIFe Values For JNVY31



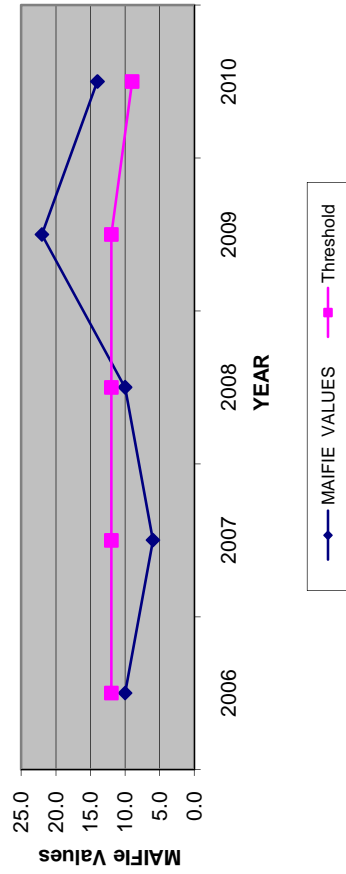
MAIFe Values For LIME12



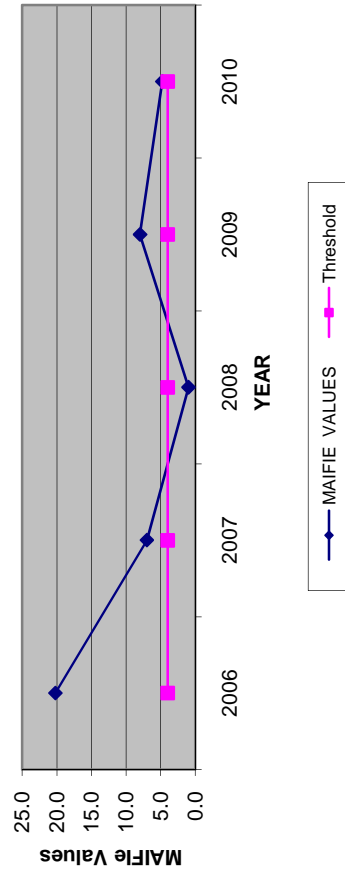
MAIFe Values For JNTA12



MAIFe Values For JNVY12

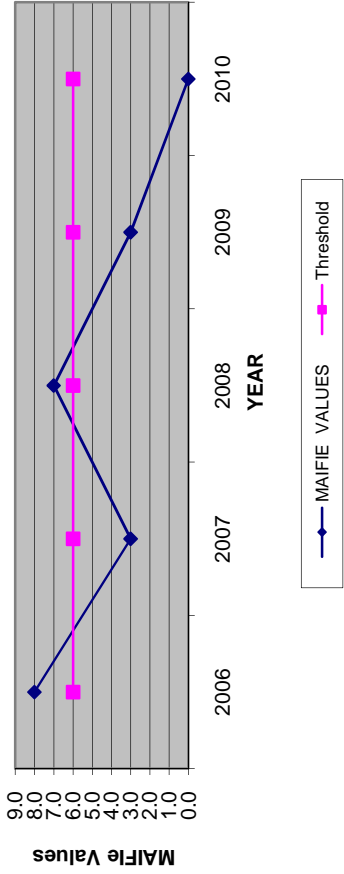


MAIFe Values For LIME11

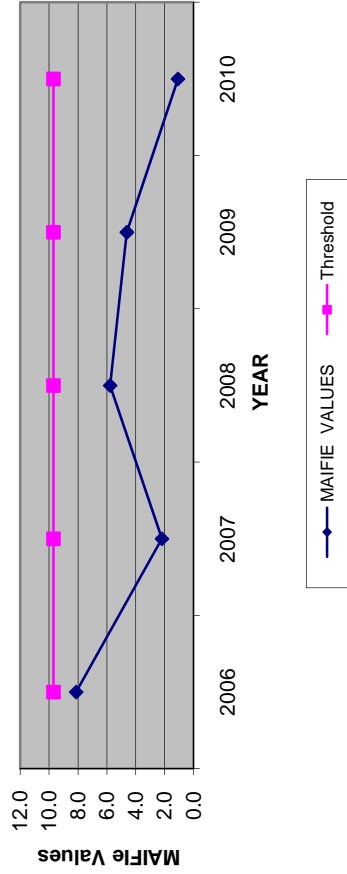


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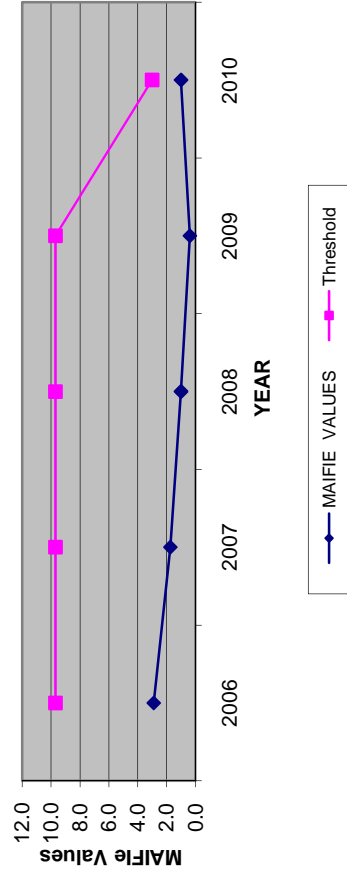
MAIFe Values For MRBT42



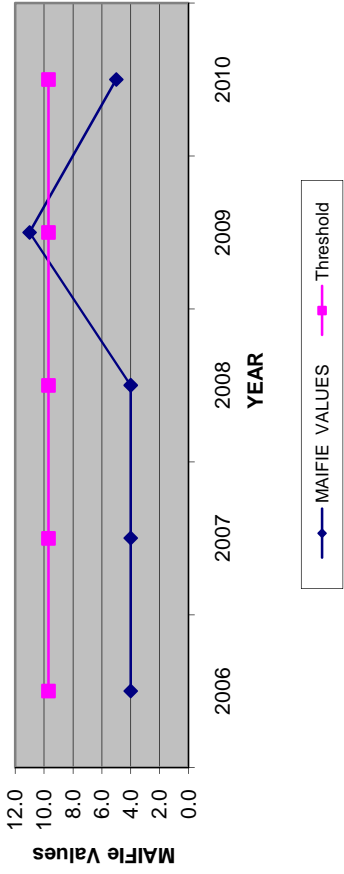
MAIFe Values For NYSA12



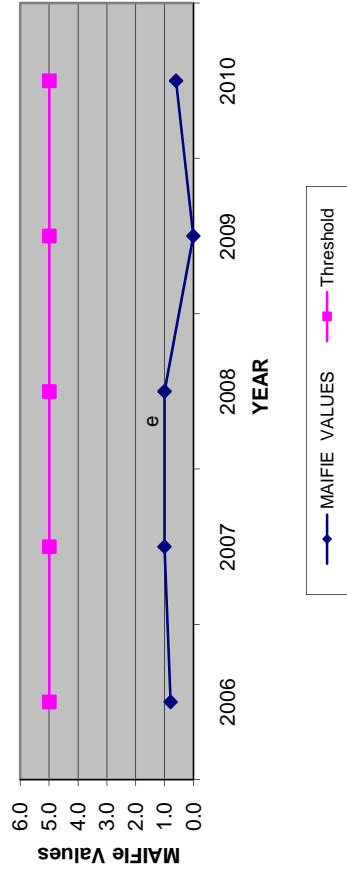
MAIFe Values For NYSA14



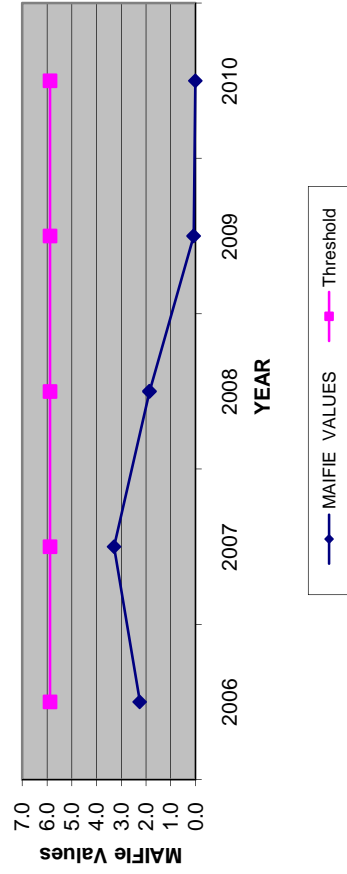
MAIFe Values For MRBT41



MAIFe Values For NYSA11

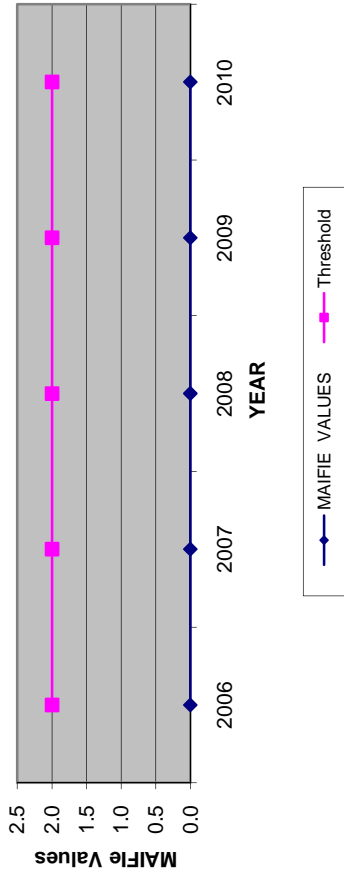


MAIFe Values For NYSA13

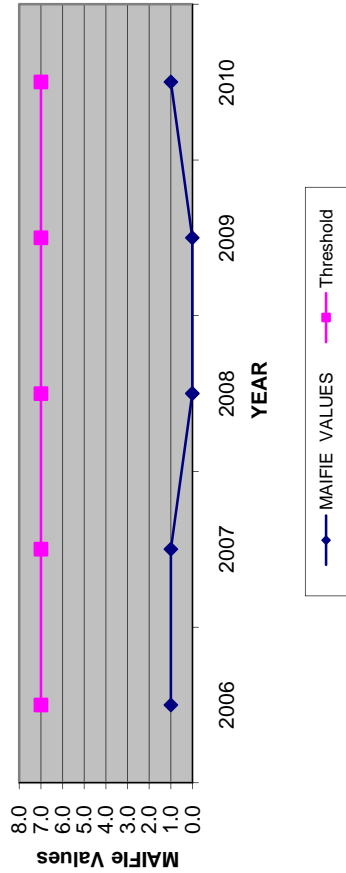




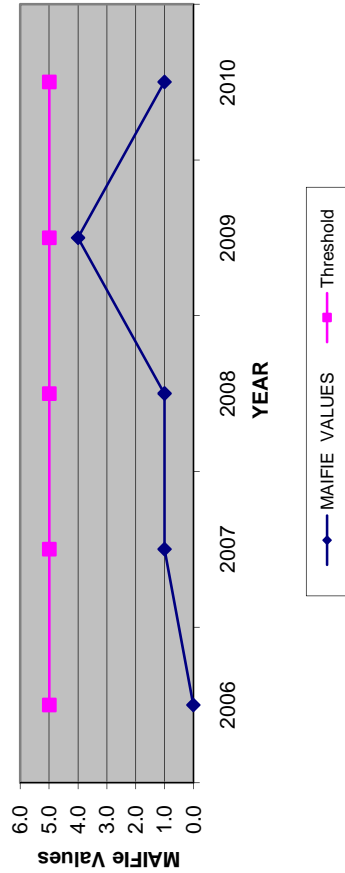
MAIFle Values For OBPR12



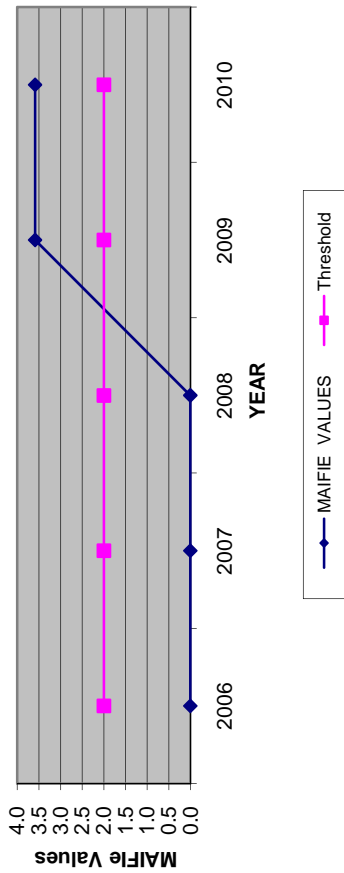
MAIFle Values For OIDA12



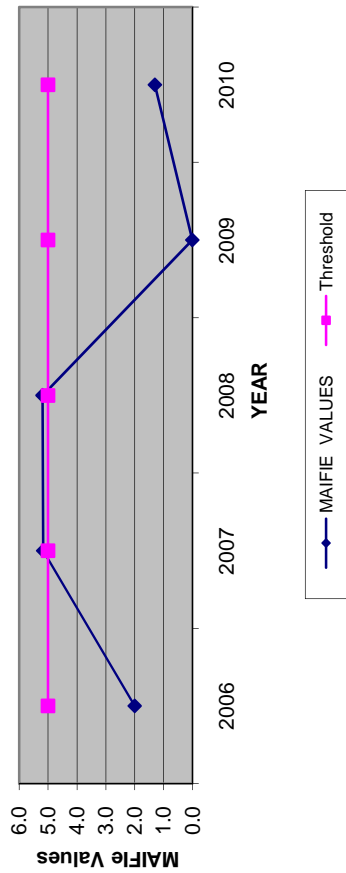
MAIFle Values For ONTO18



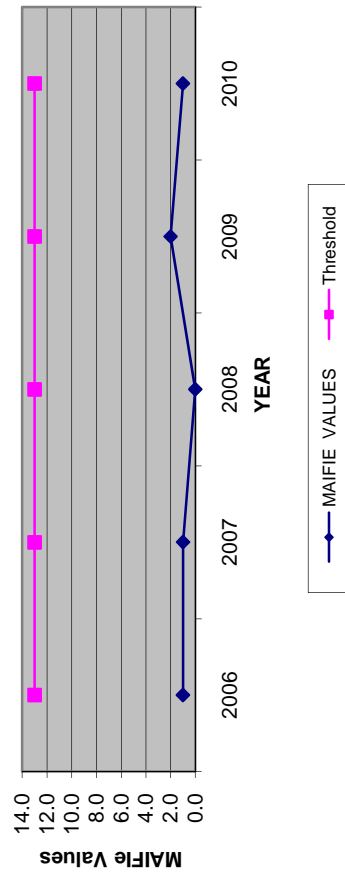
MAIFle Values For OBPR11



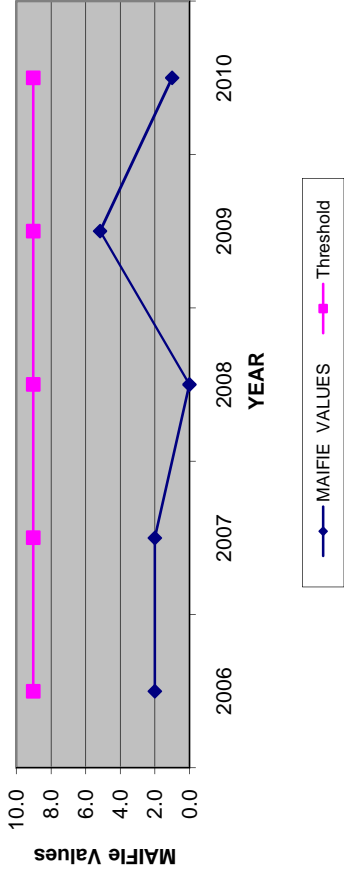
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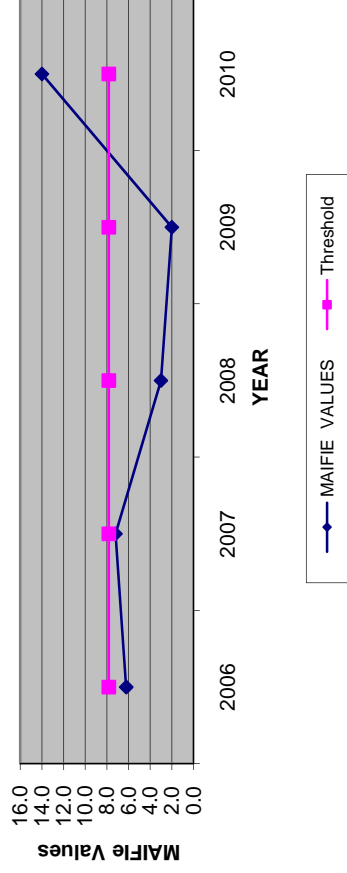
MAIFle Values For ONTO14



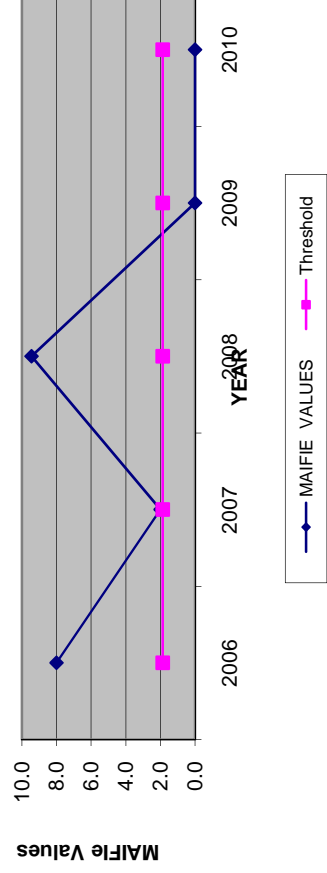
MAIFle Values For ONTO20



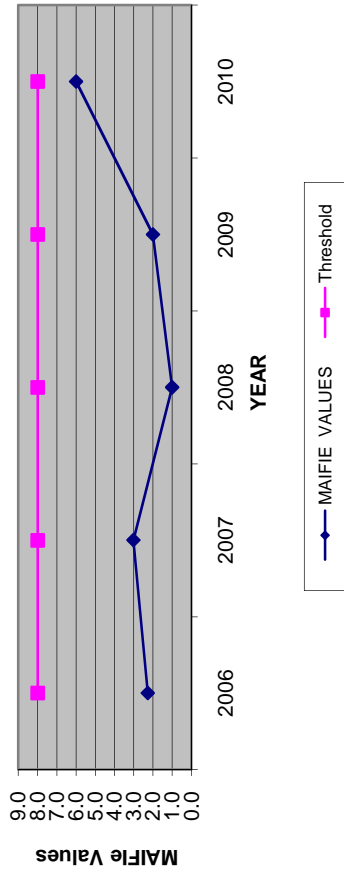
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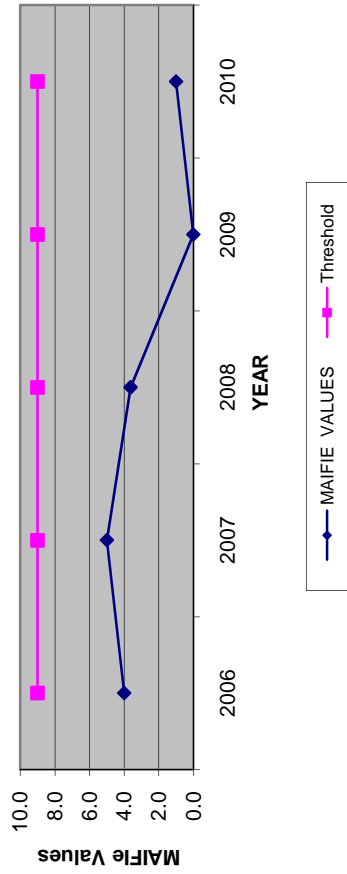
MAIFle Values For OYDM11



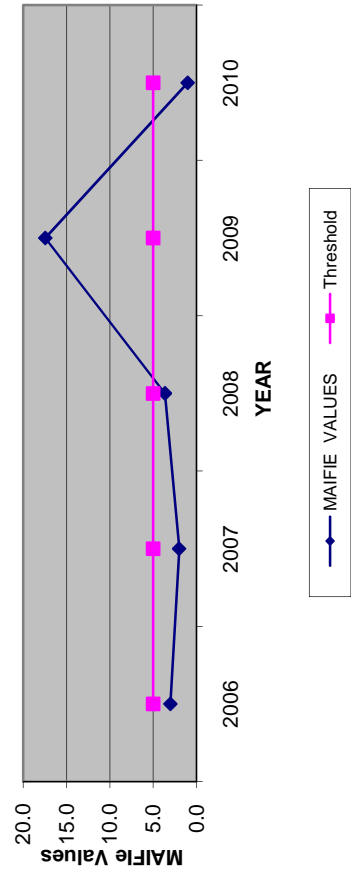
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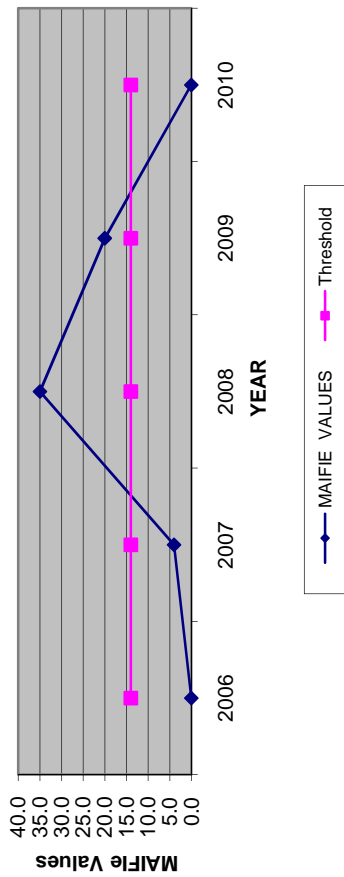
MAIFle Values For ONTO23



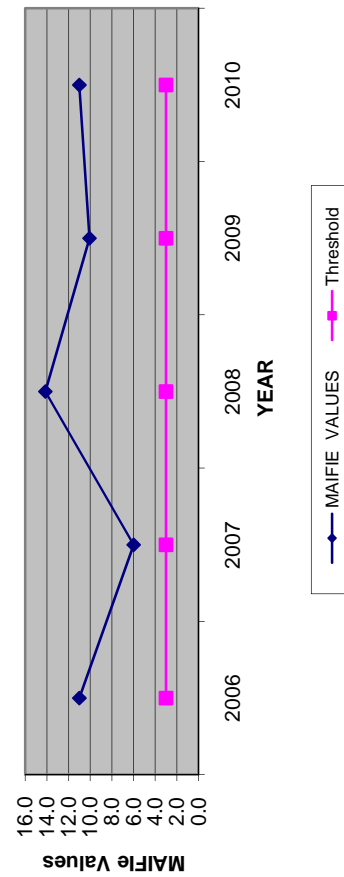
MAIFle Values For ONTO25



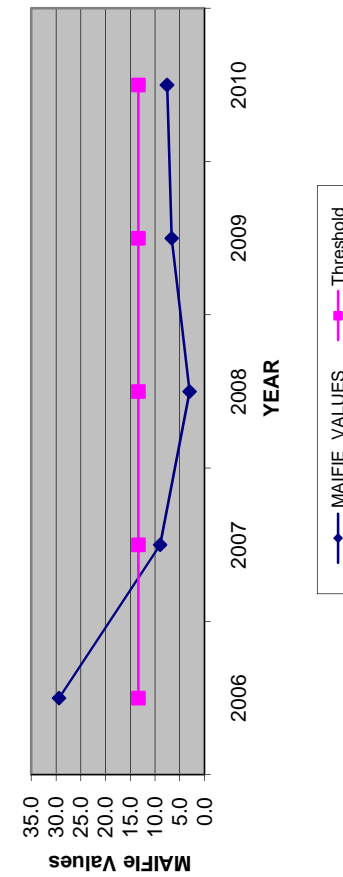
MAIFie Values For PNCK12



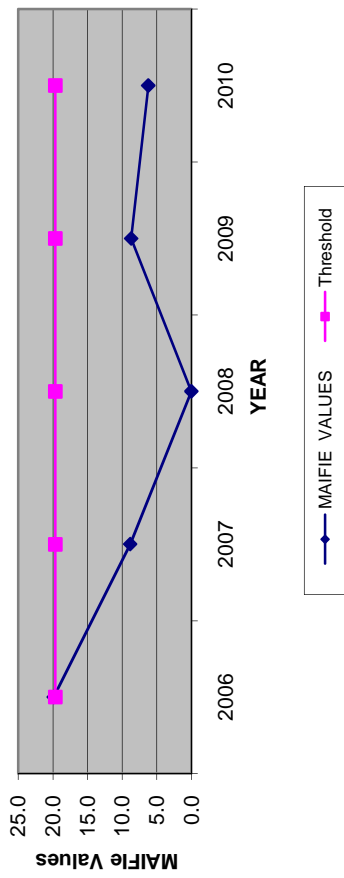
MAIFie Values For RKVL11



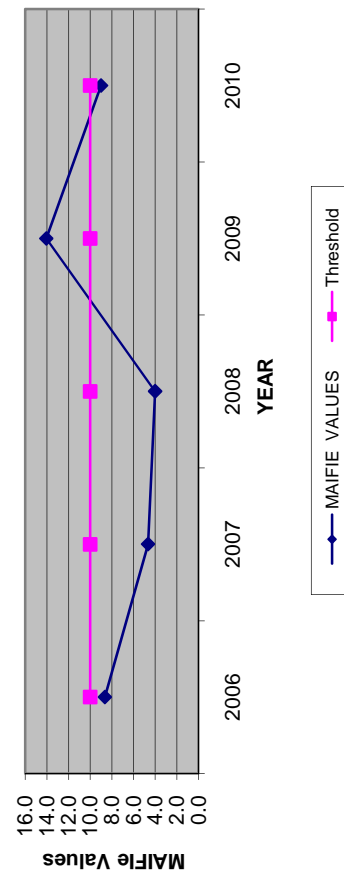
MAIFie Values For UNTY12



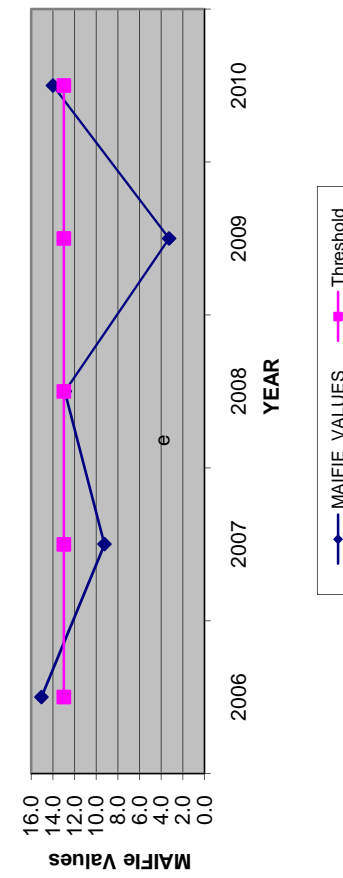
MAIFie Values For PNCK11



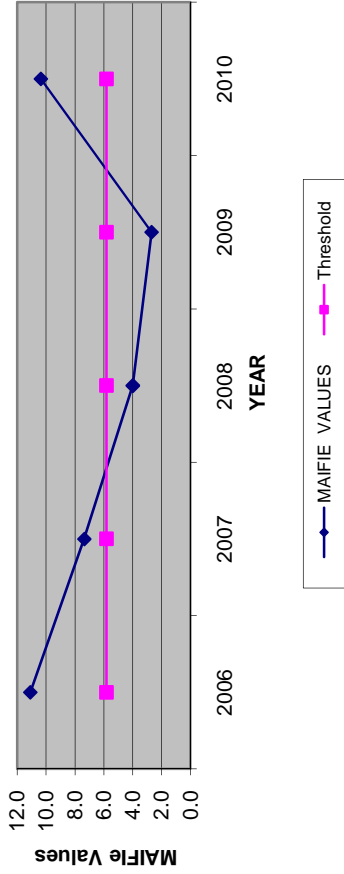
MAIFie Values For PRMA42



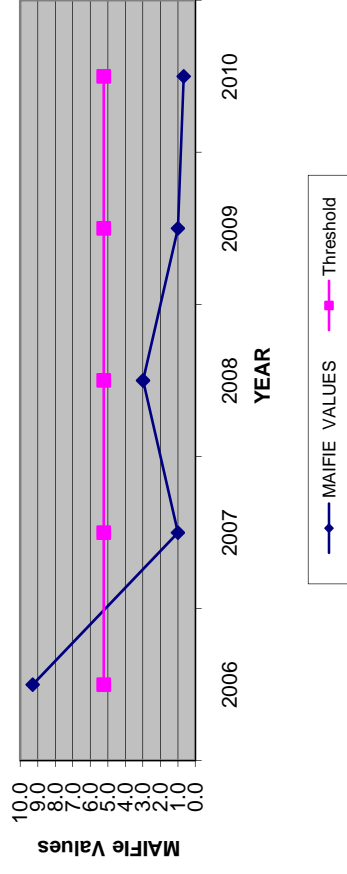
MAIFie Values For UNTY11



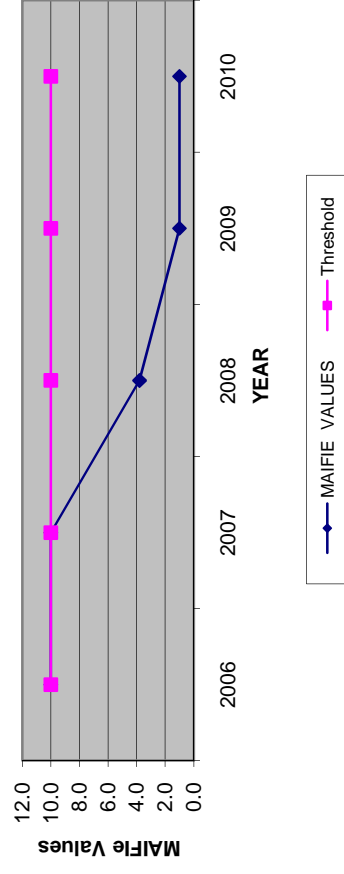
MAIFle Values For VALE13



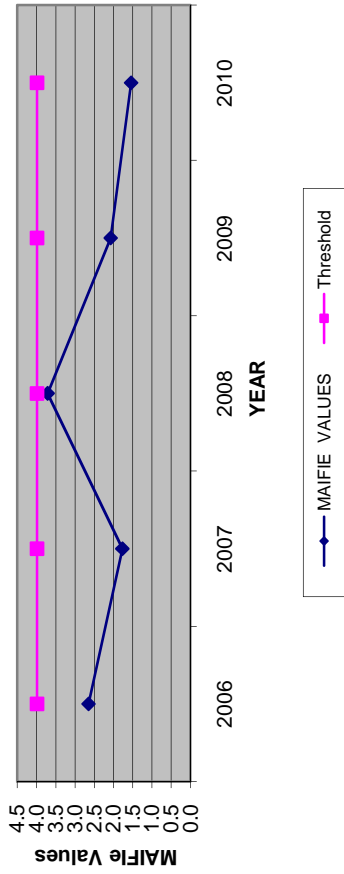
MAIFle Values For VALE15



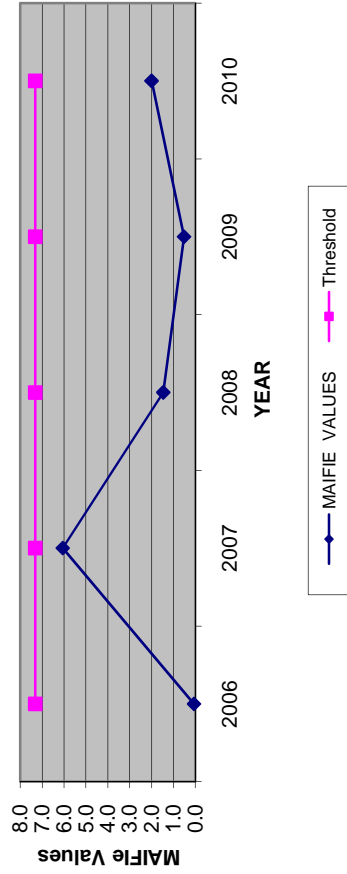
MAIFle Values For WESR14



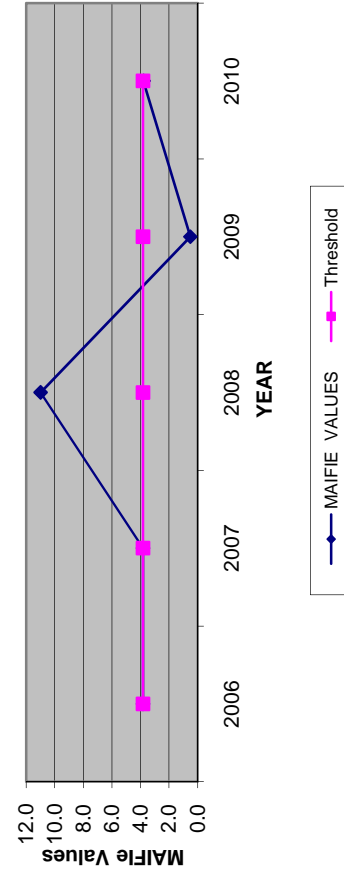
MAIFle Values For VALE11



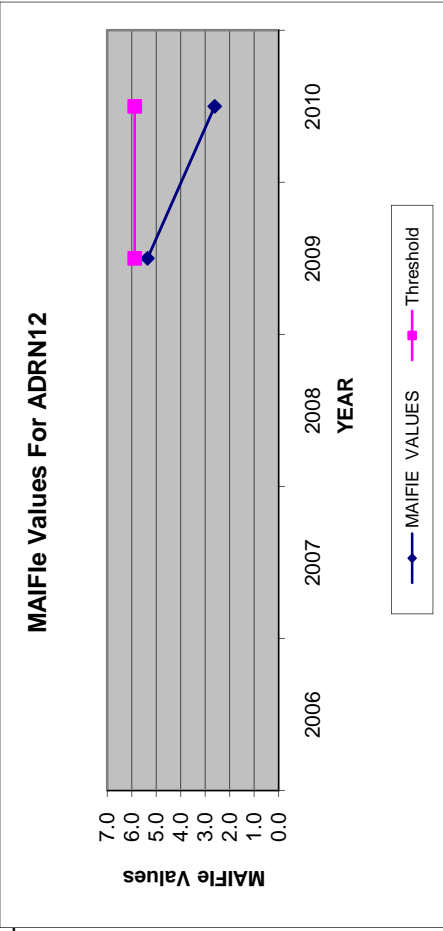
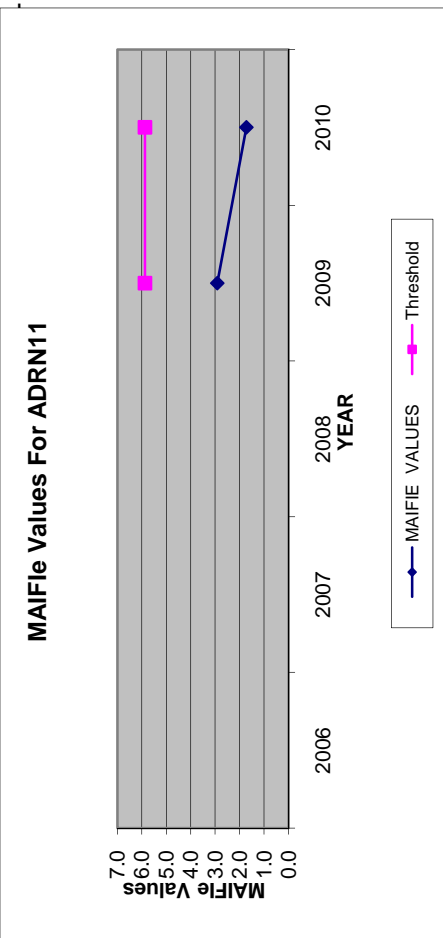
MAIFle Values For VALE14

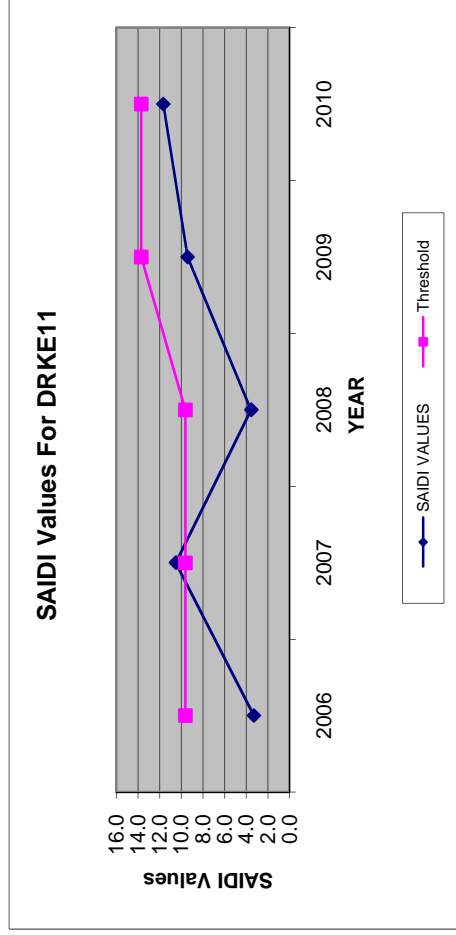
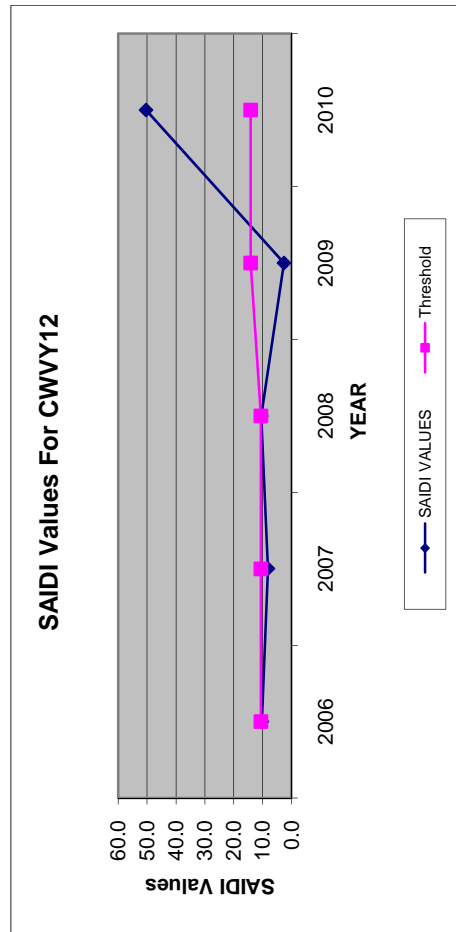
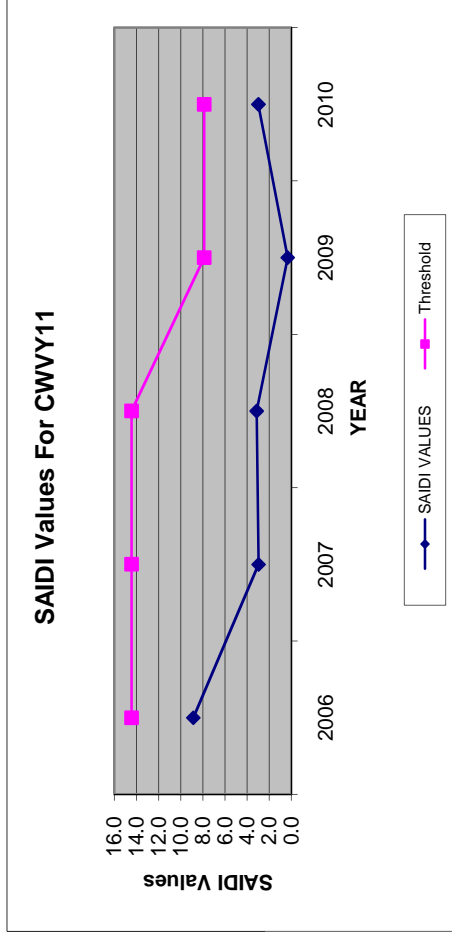
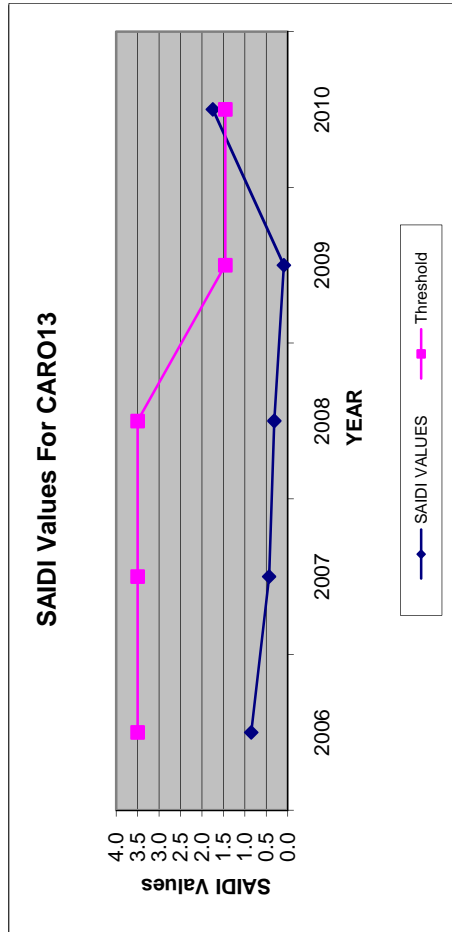
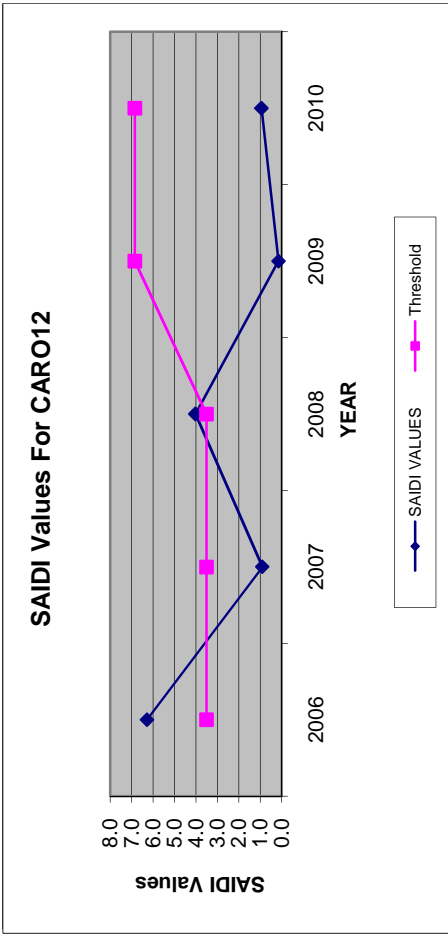
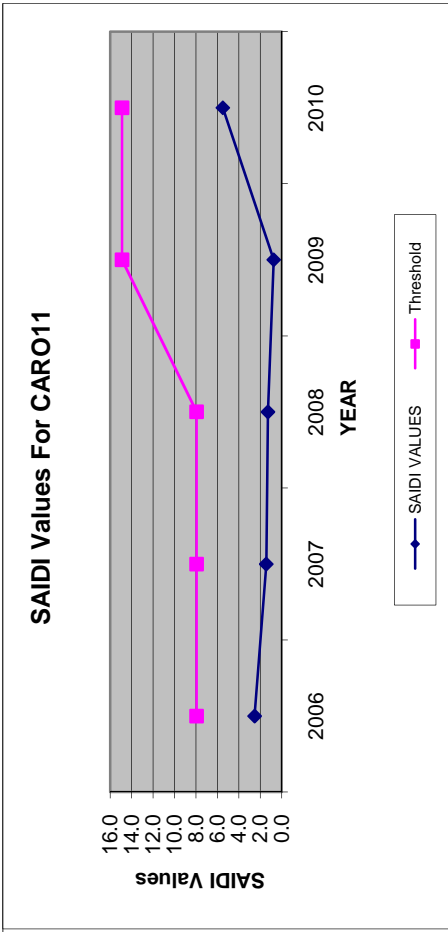


MAIFle Values For WESR13

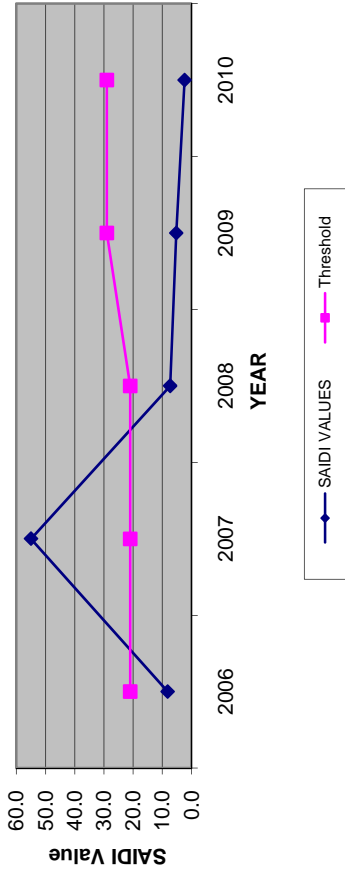


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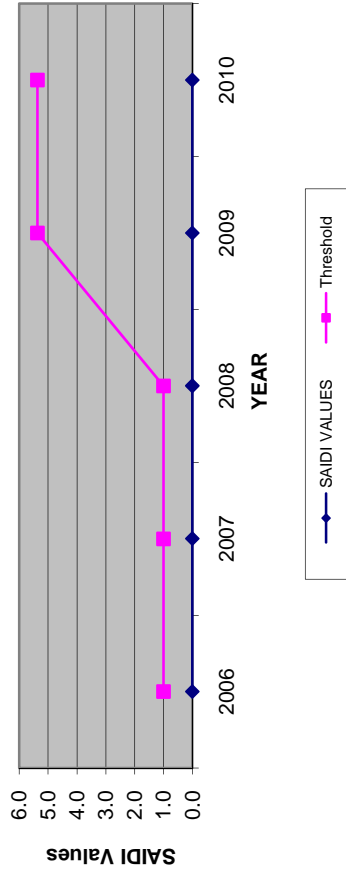




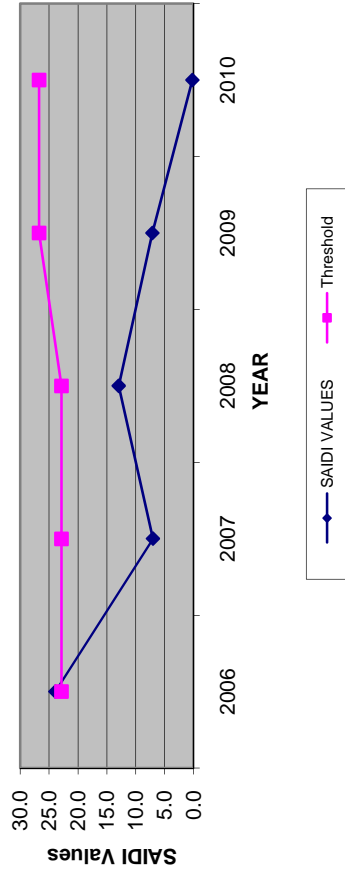
SAIDI Values For DWSY11



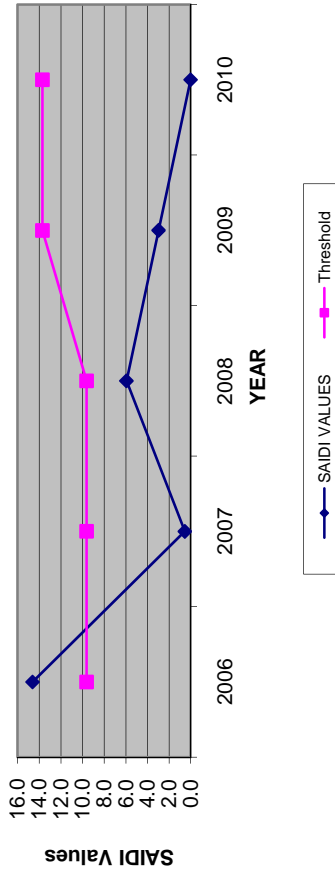
SAIDI Values For HCSU11



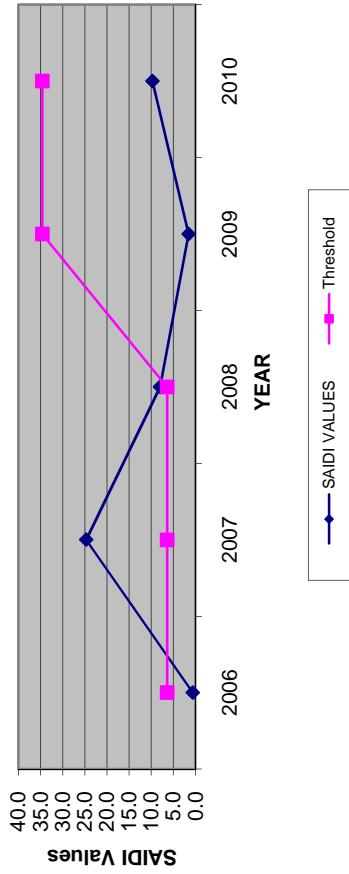
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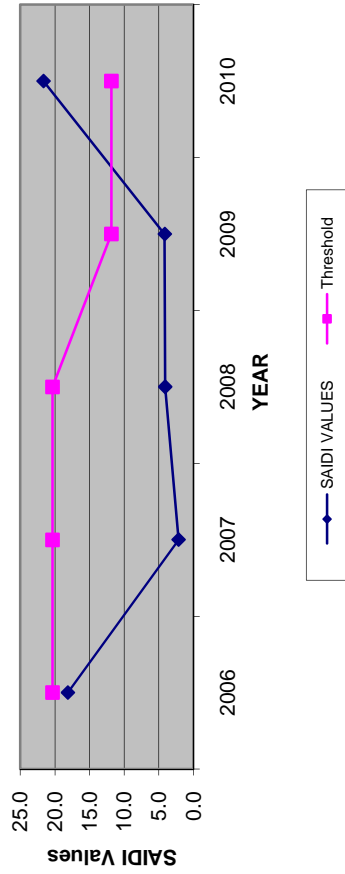
SAIDI Values For DUKE11



SAIDI Values For ESTN11

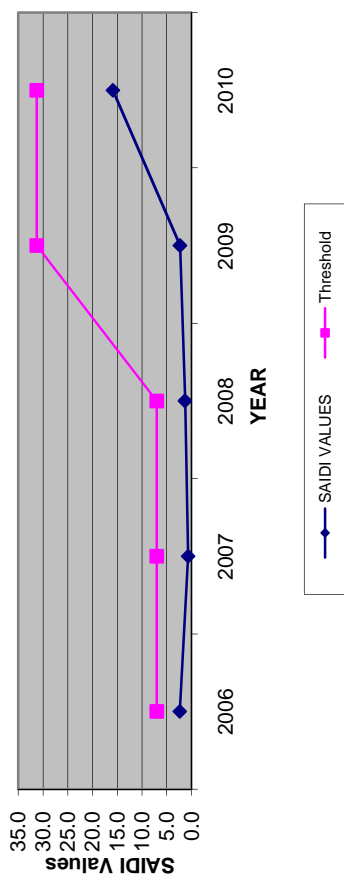


SAIDI Values For HFWY11

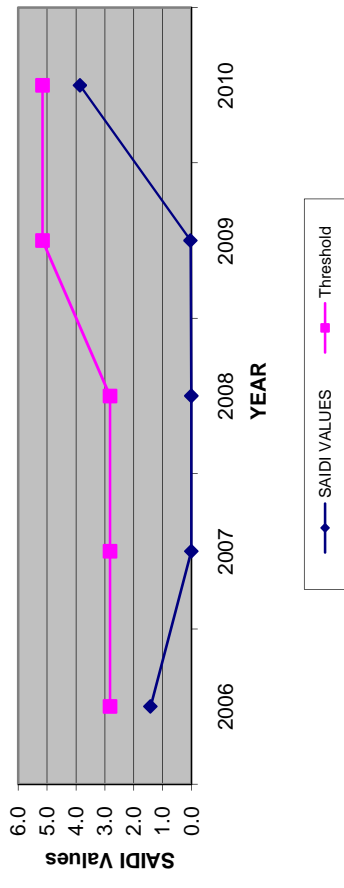


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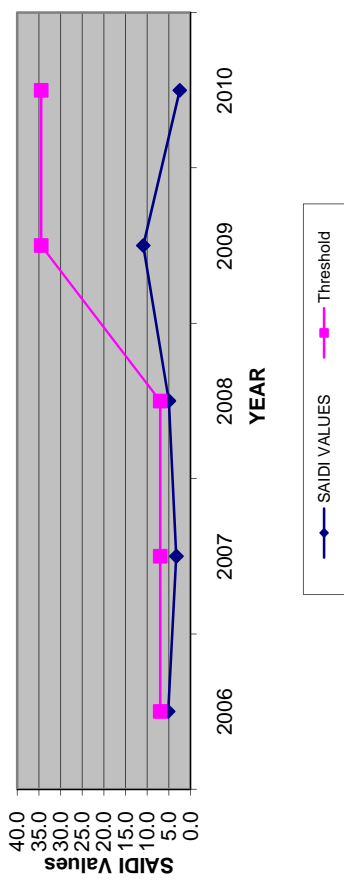
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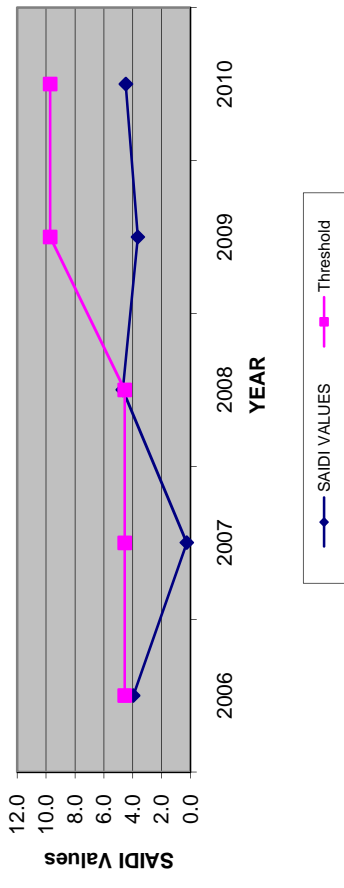
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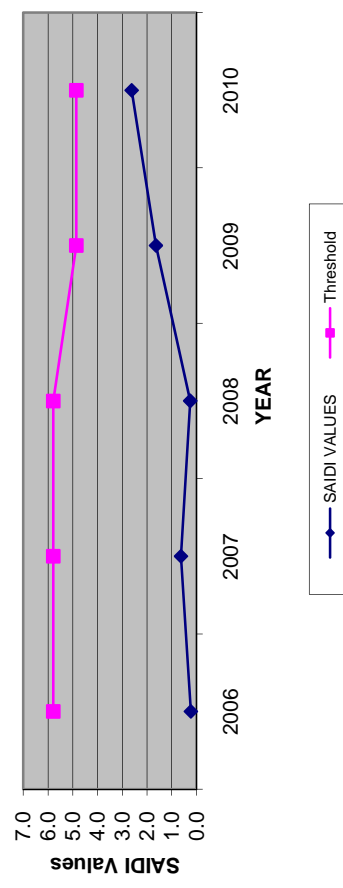
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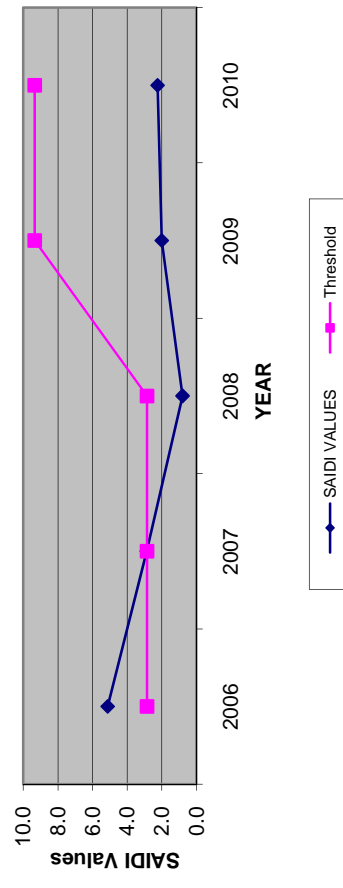
SAIDI Values For HOLY11



SAIDI Values For HOLY12



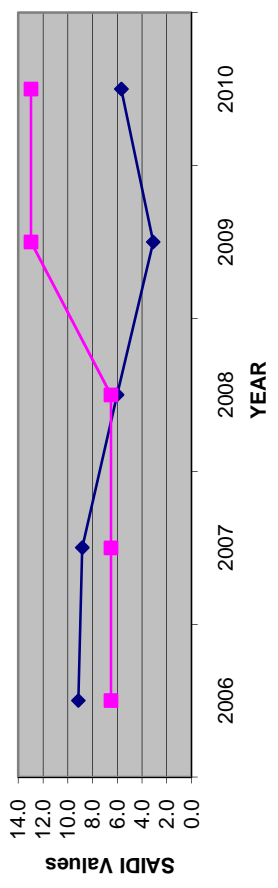
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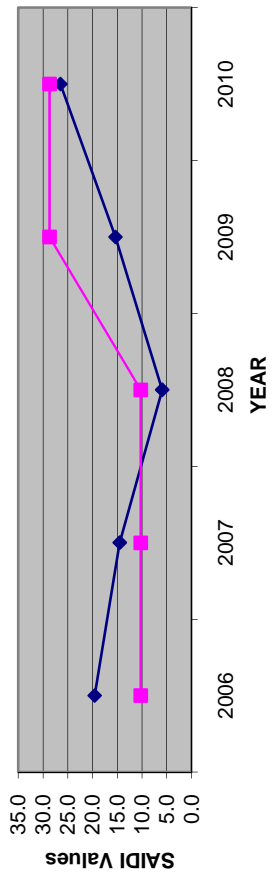


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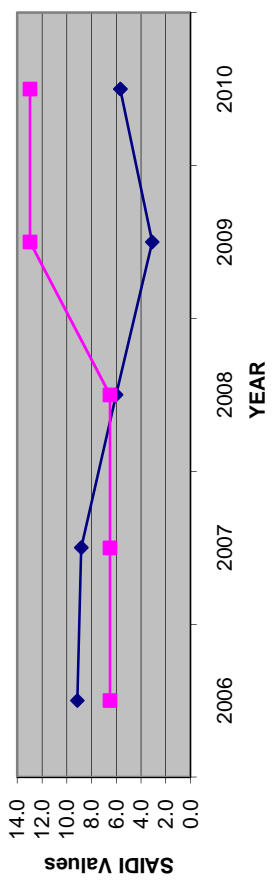
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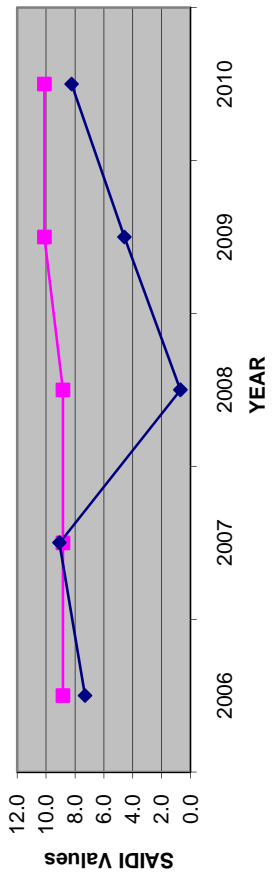
SAIDI Values for HRPR11



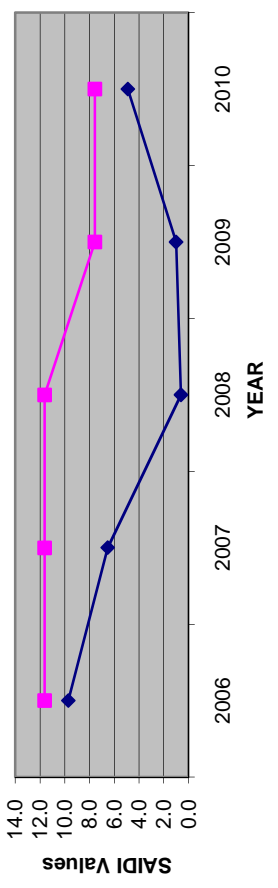
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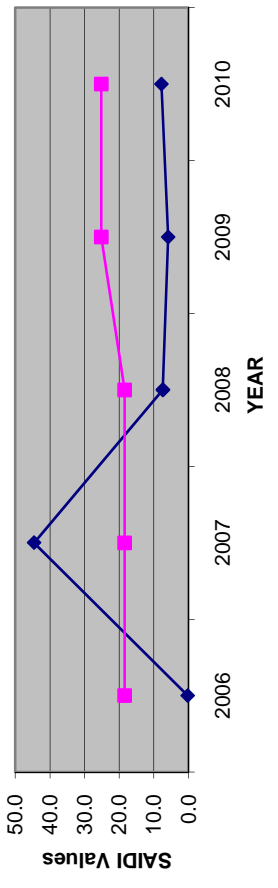
SAIDI Values For JMSN11



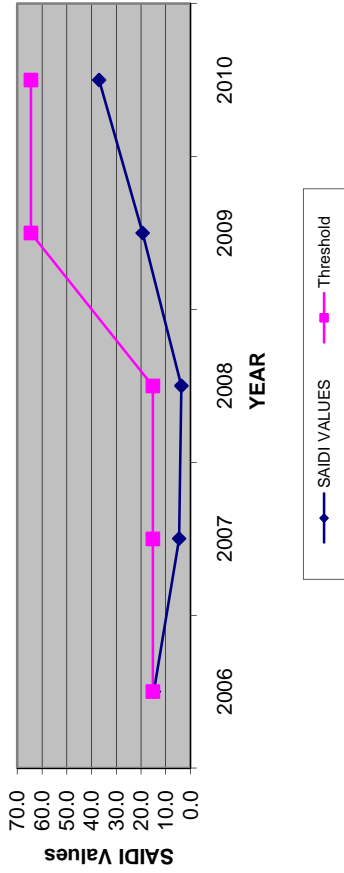
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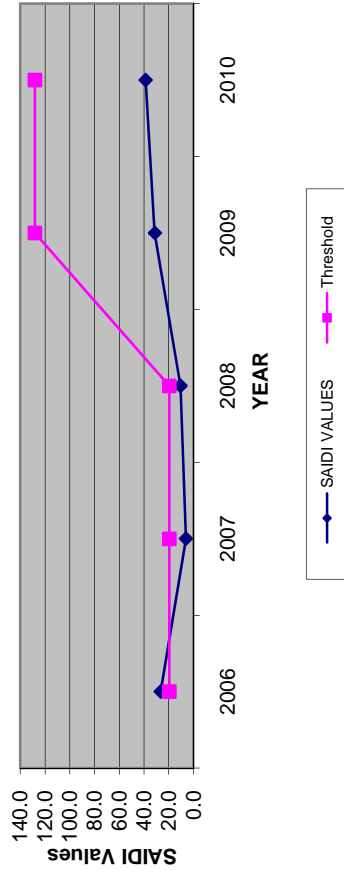
SAIDI Values For JNTA11



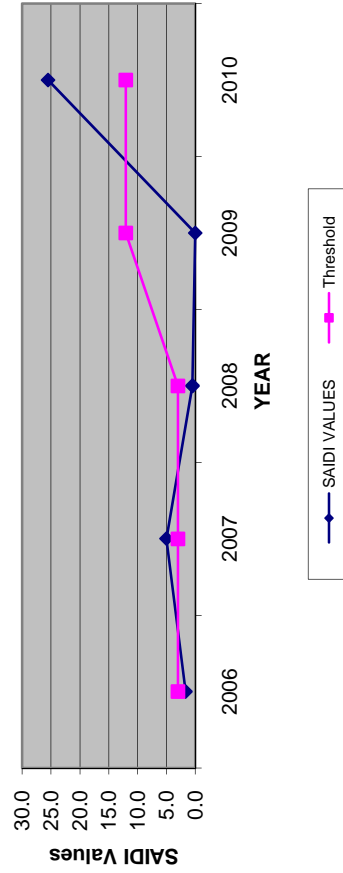
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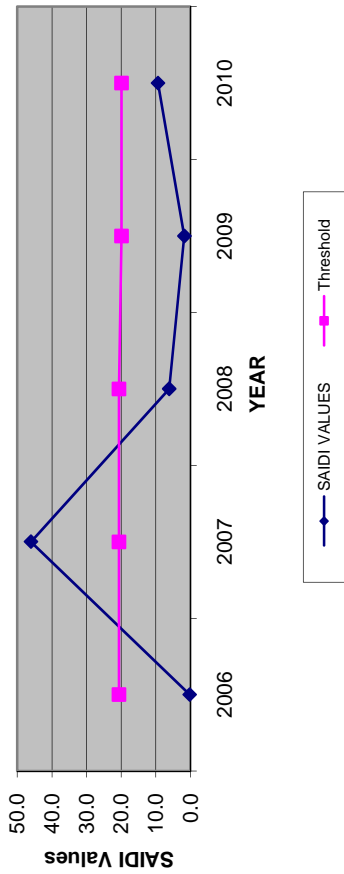
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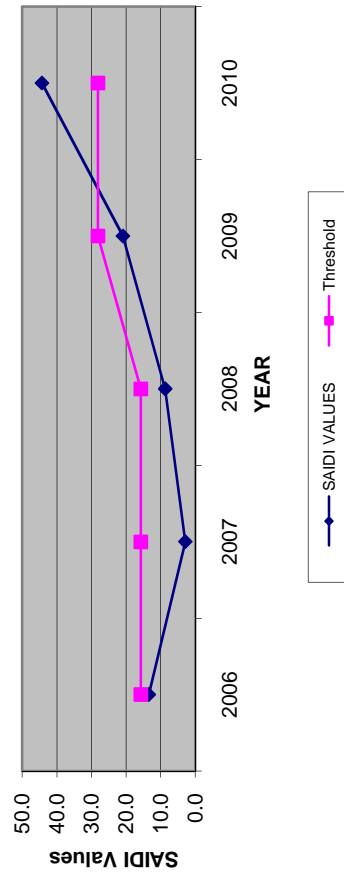
SAIDI Values For LIME12



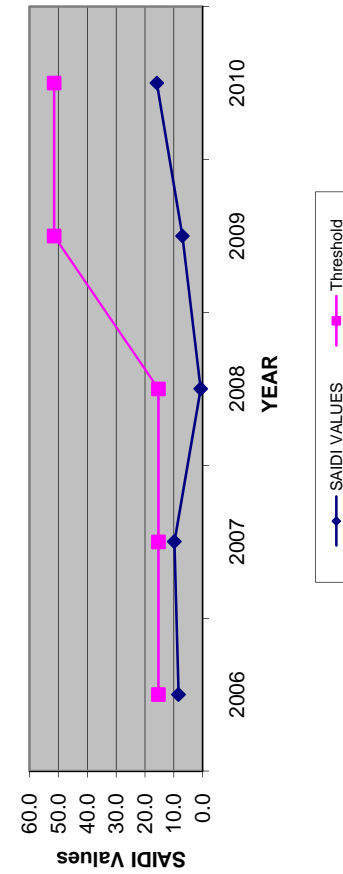
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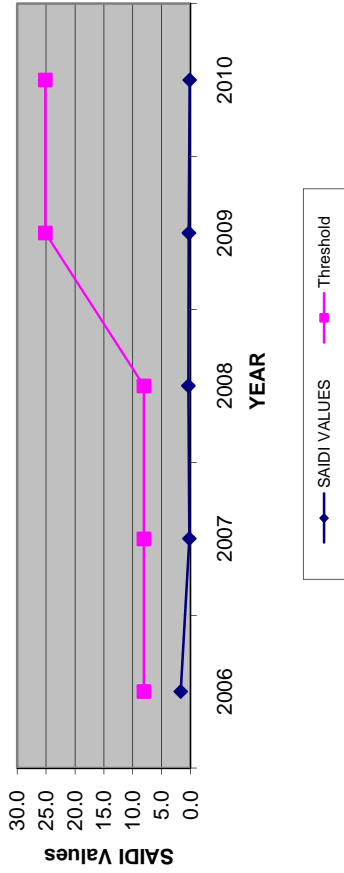
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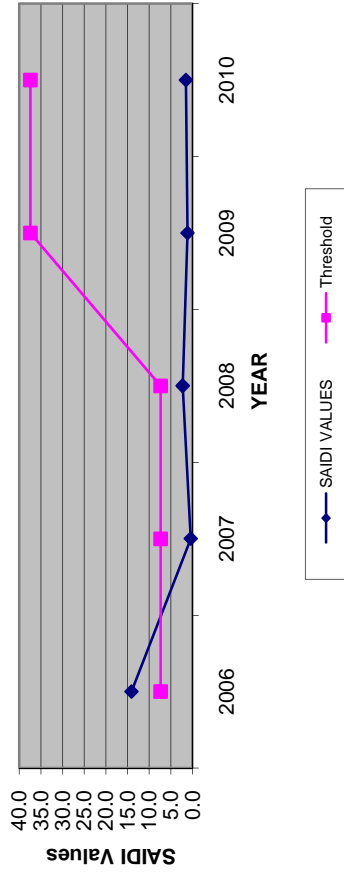
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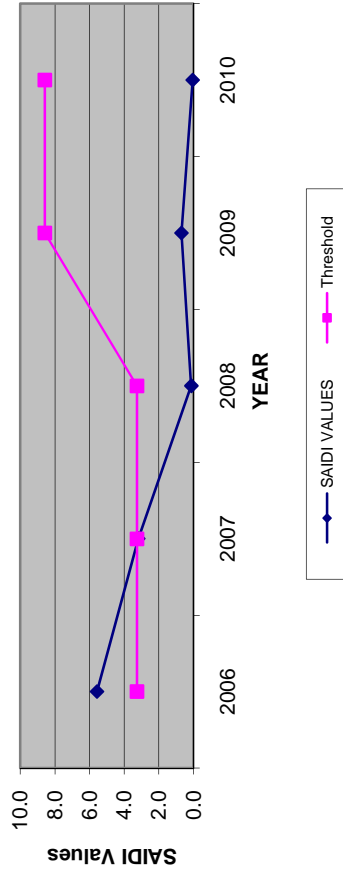
SAIDI Values For MRBT42



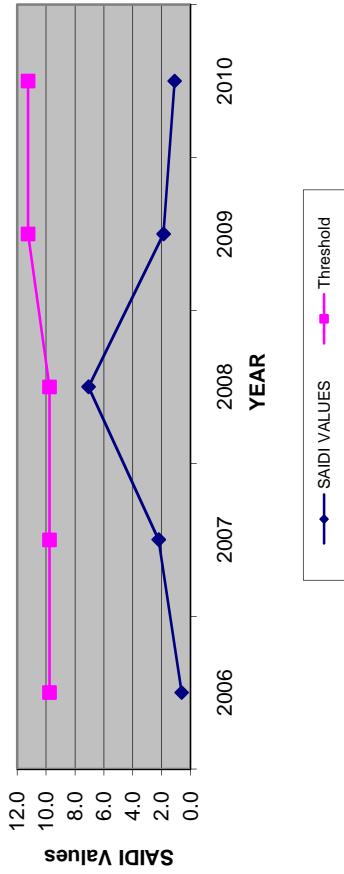
SAIDI Values For NYSA12



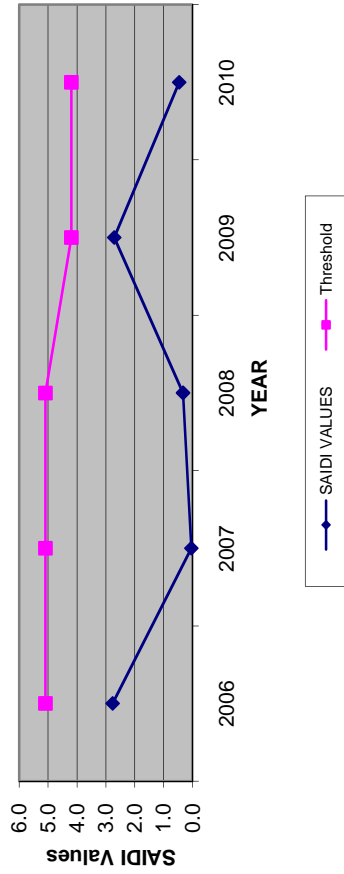
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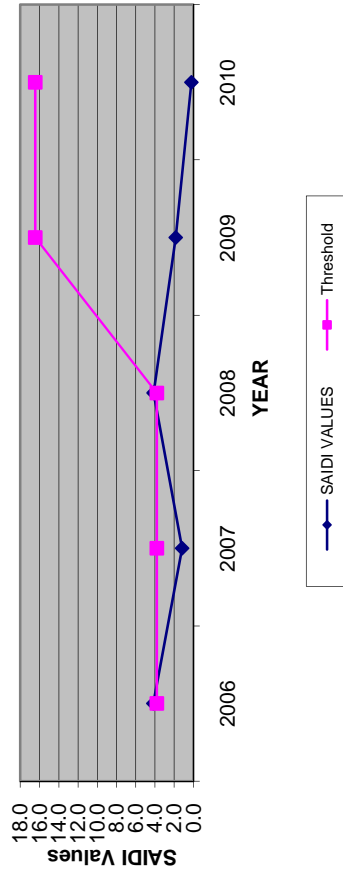
SAIDI Values For MRBT41



SAIDI Values For NYSA11

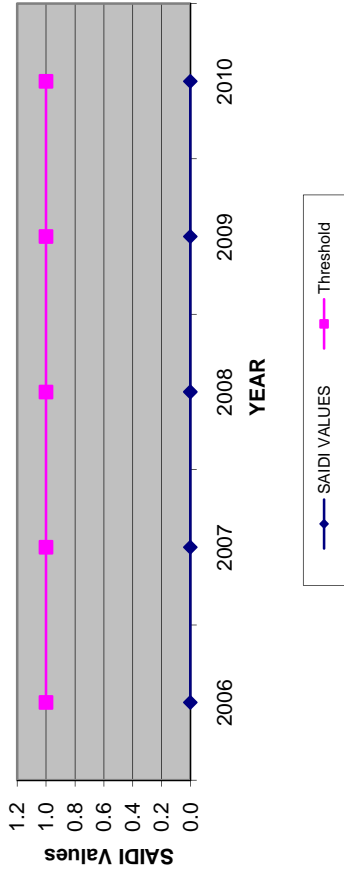


SAIDI Values For NYSA13

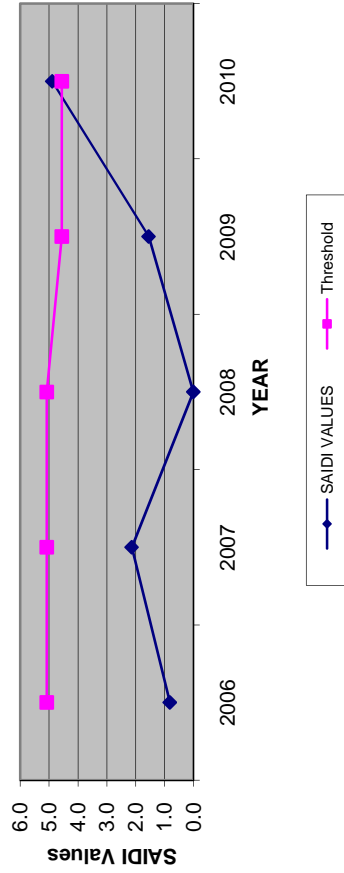


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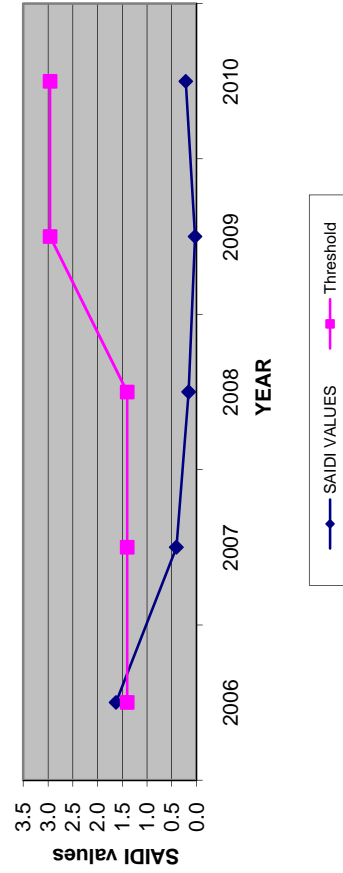
SAIDI Values For OBPR12



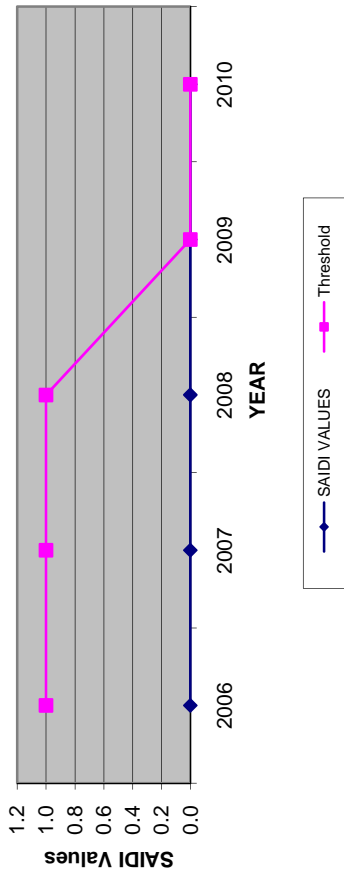
SAIDI Values For OIDA12



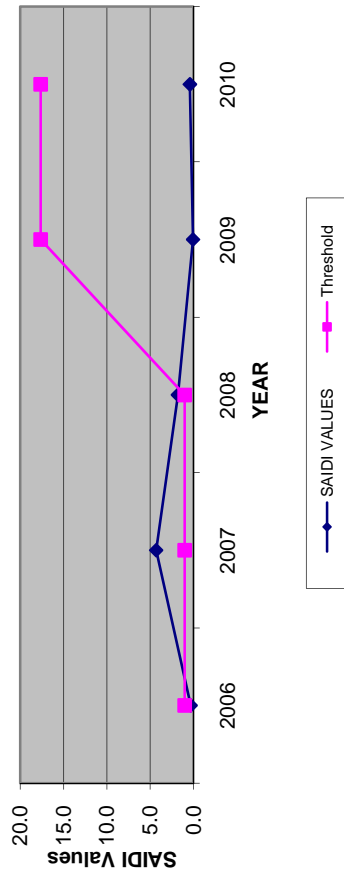
SAIDI Values For ONTO18



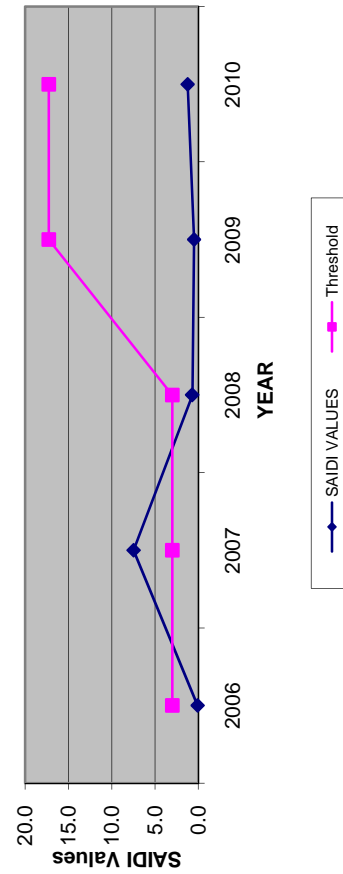
SAIDI Values For OBPR11



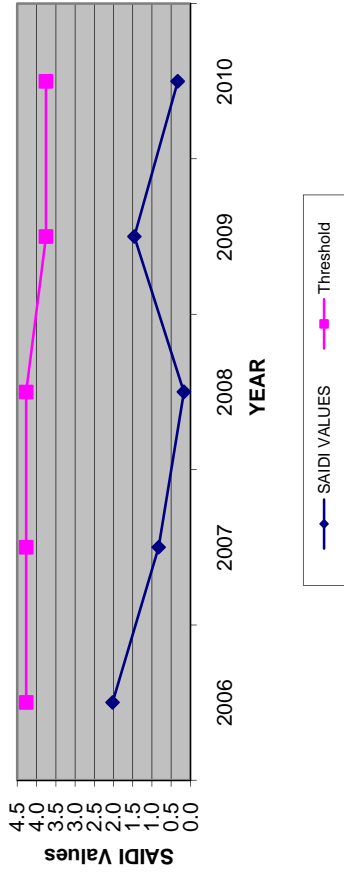
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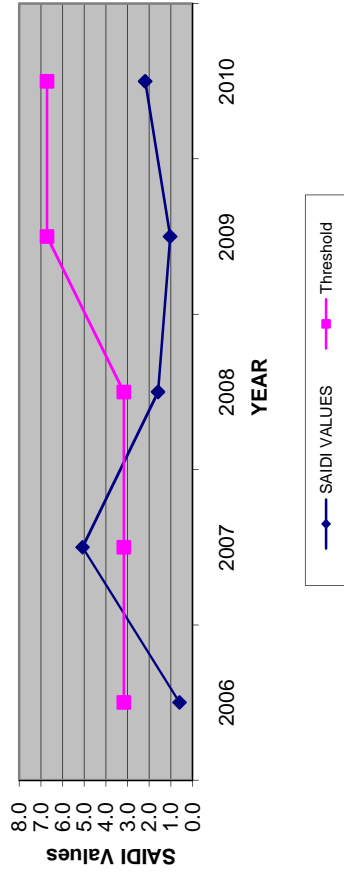
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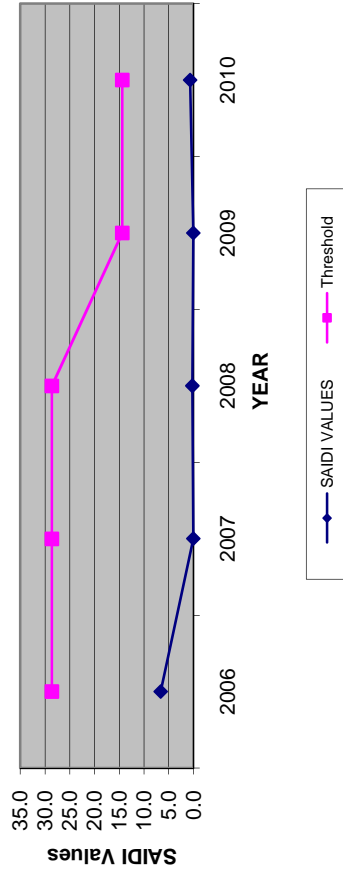
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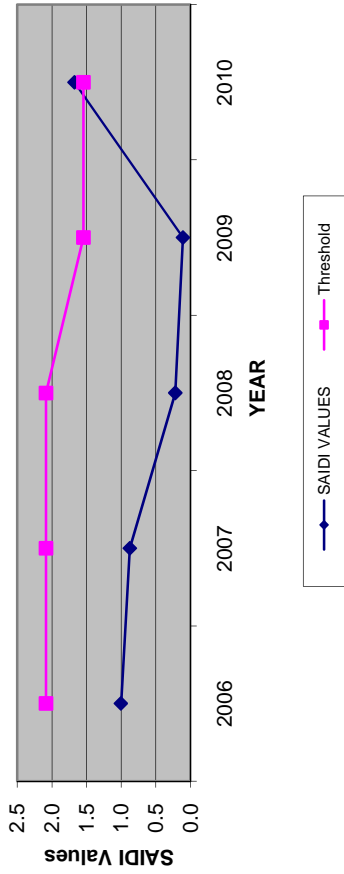
SAIDI Values For ONTO24



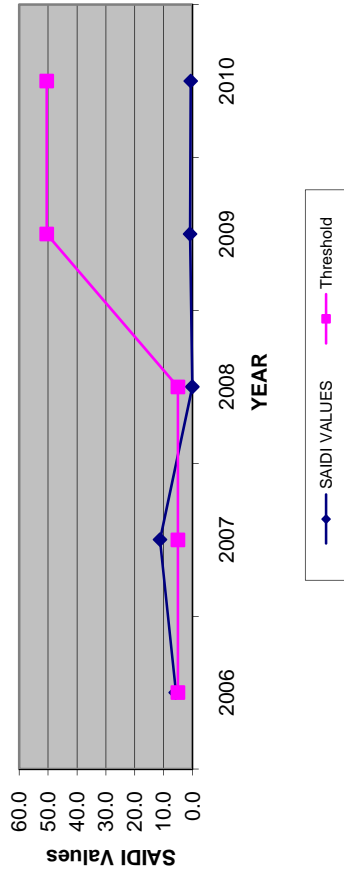
SAIDI Values For OYDM11



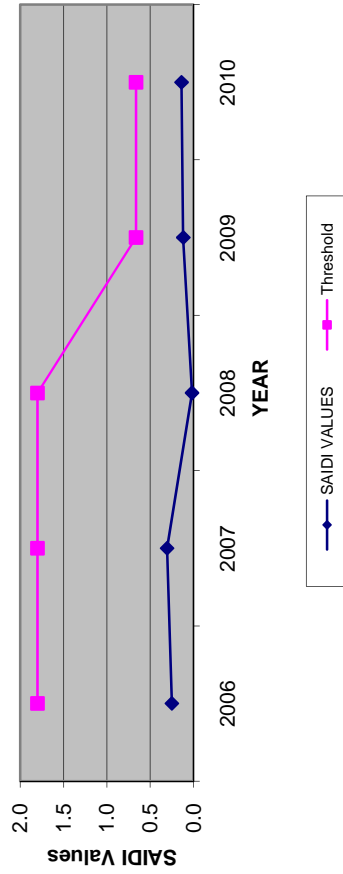
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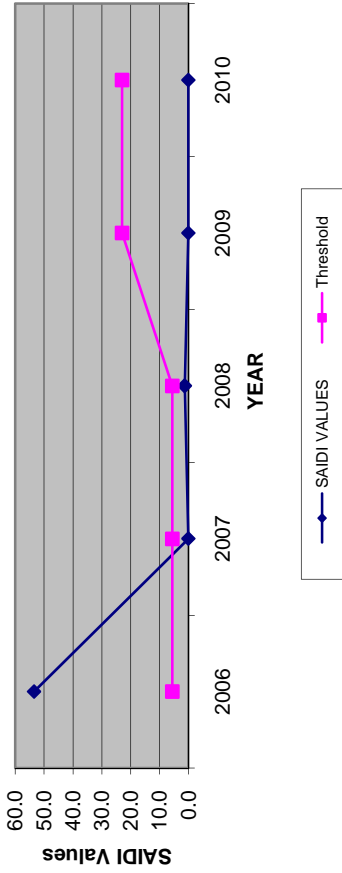
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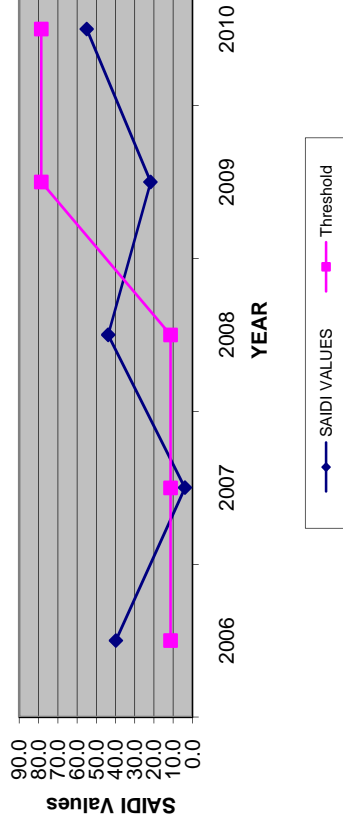
SAIDI Values For ONTO25



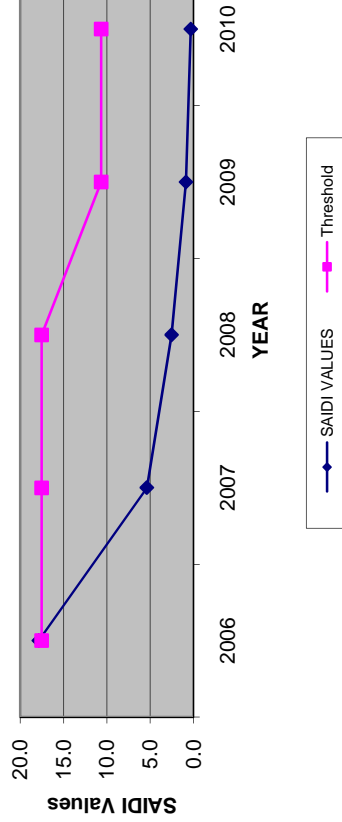
SAIDI Values For PNCK12



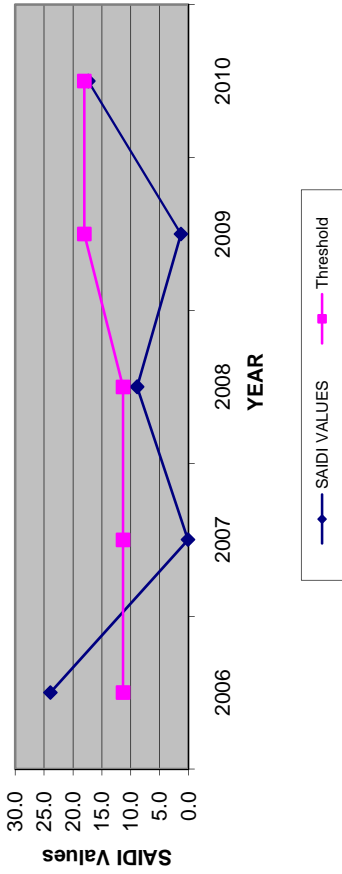
SAIDI Values For RKVL11



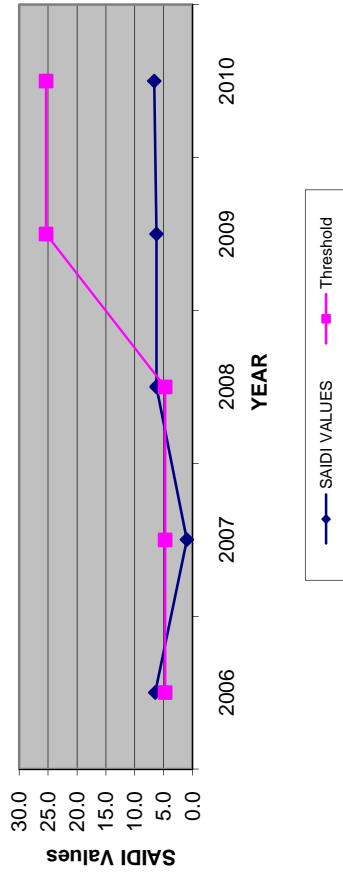
SAIDI Values For UNTY12



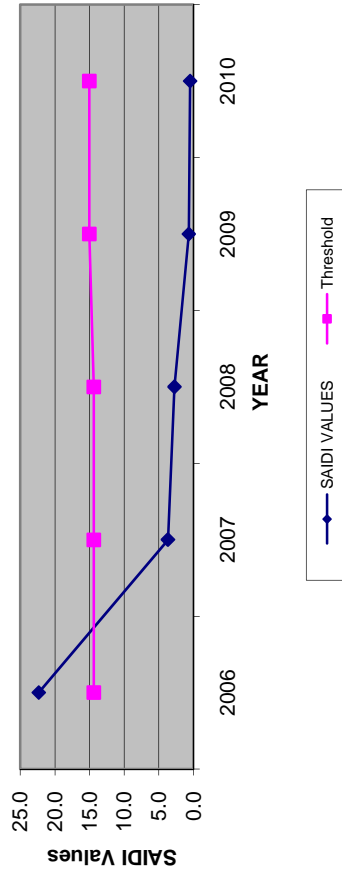
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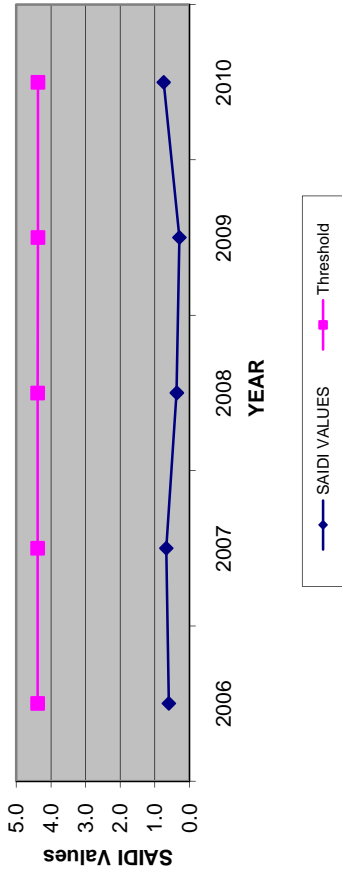
SAIDI Values For PRMA42



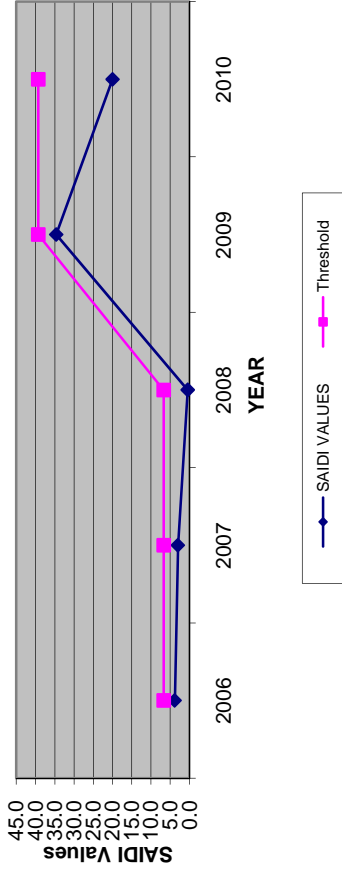
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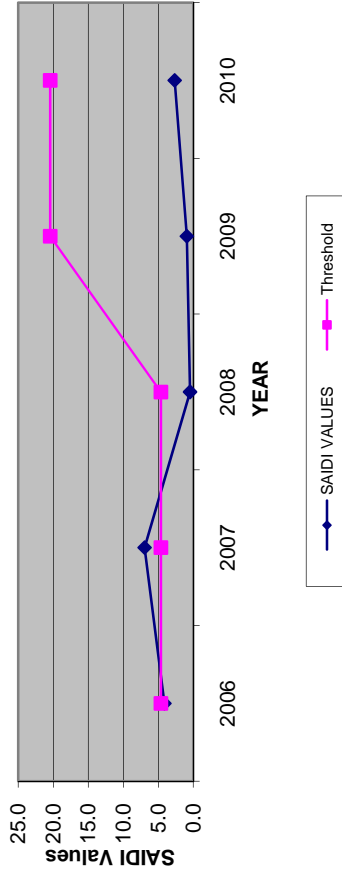
SAIDI Values For VALE11



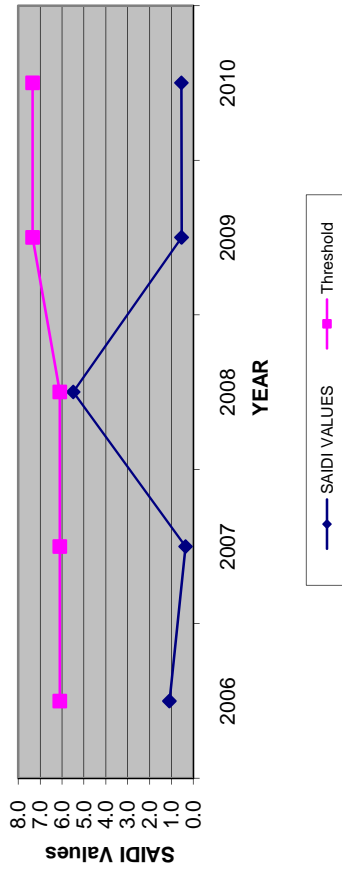
SAIDI Values For VALE13



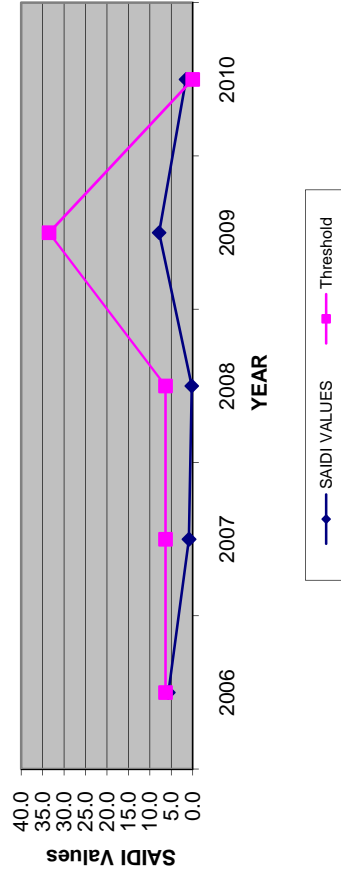
SAIDI Values For VALE14



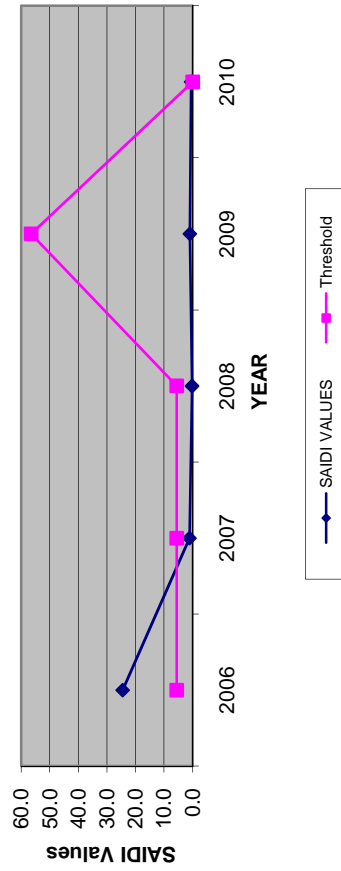
SAIDI Values For VALE15



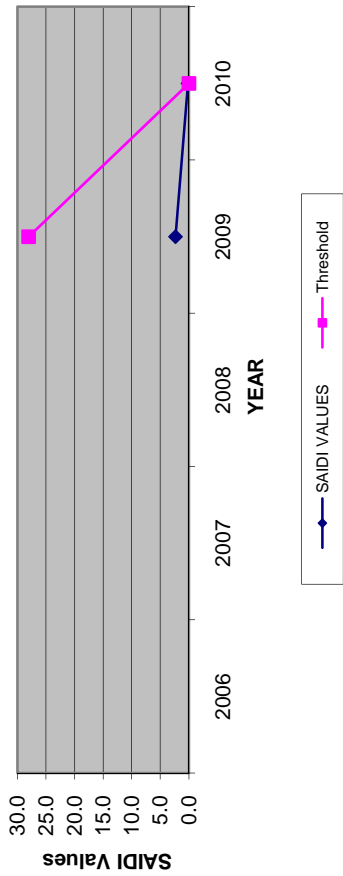
SAIDI Values For WESR13



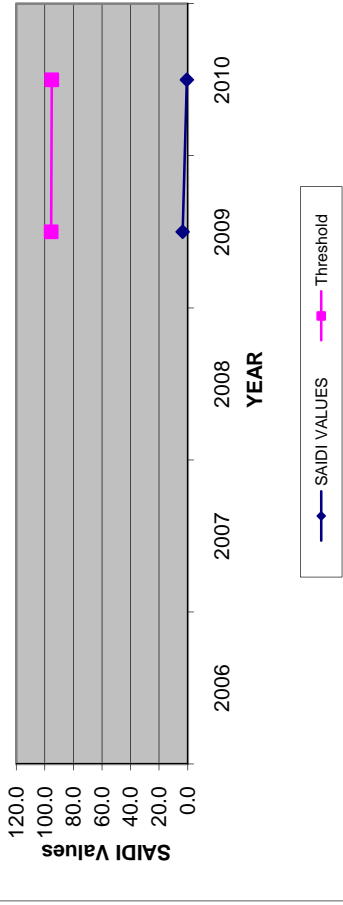
SAIDI Values For WESR14



SAIDI Values For ADRN11

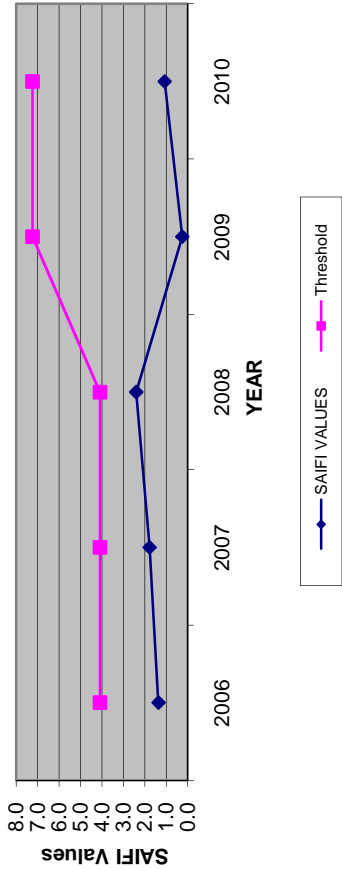


SAIDI Values For ADRN12

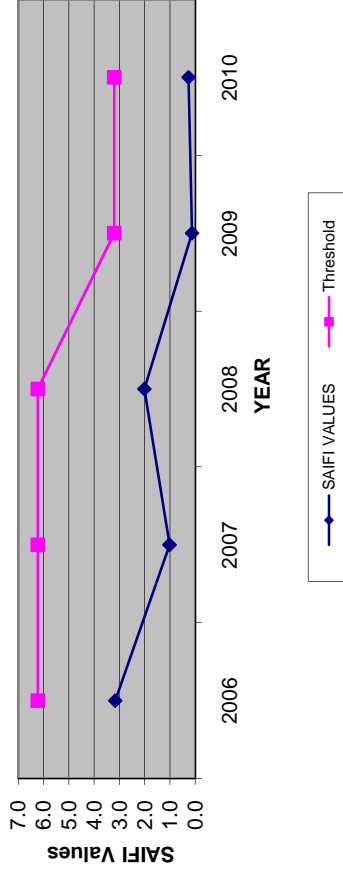




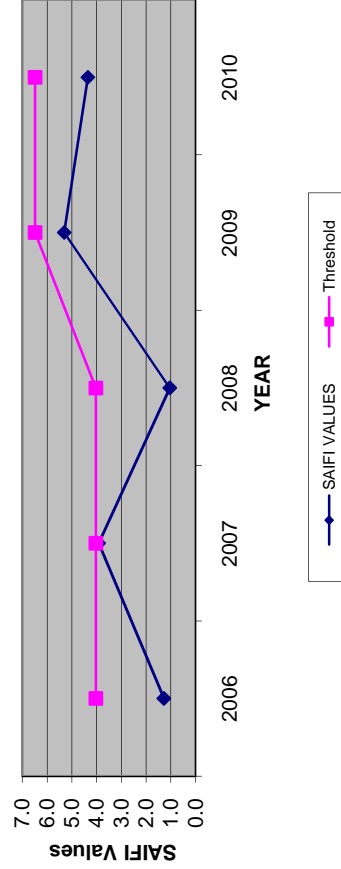
SAIFI Values For CARO12



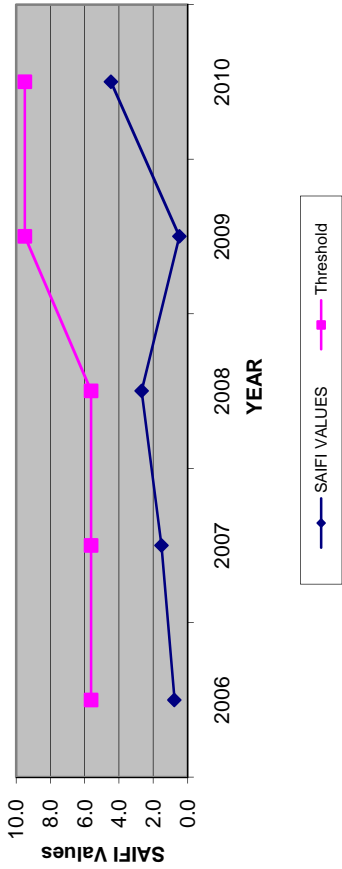
SAIFI Values For CWVY11



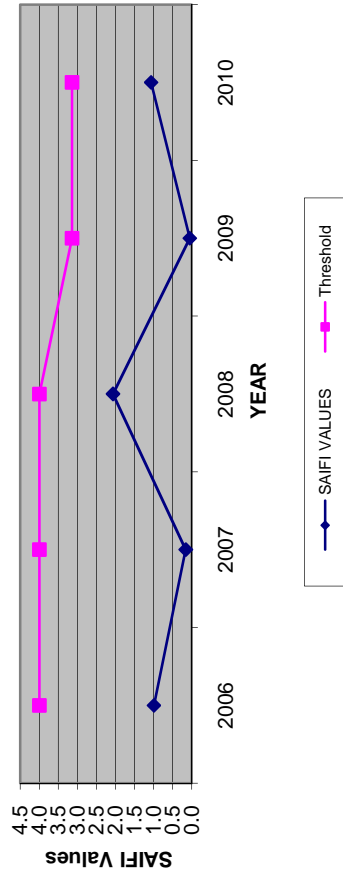
SAIFI Values For DRKE11



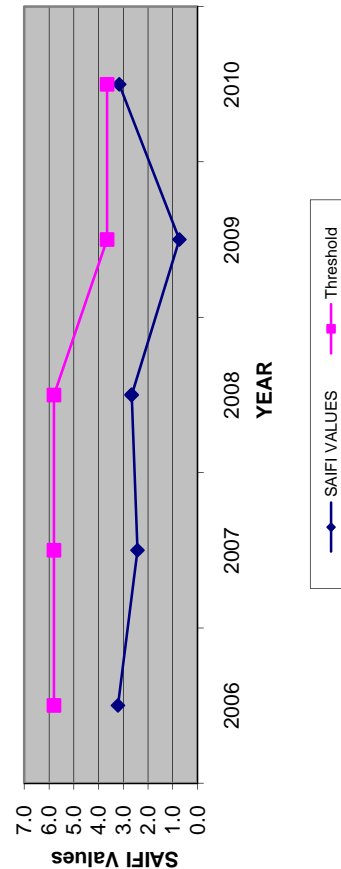
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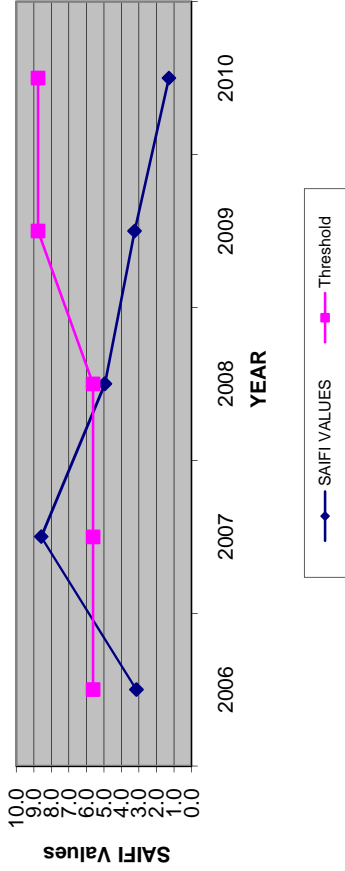
SAIFI Values For CARO13



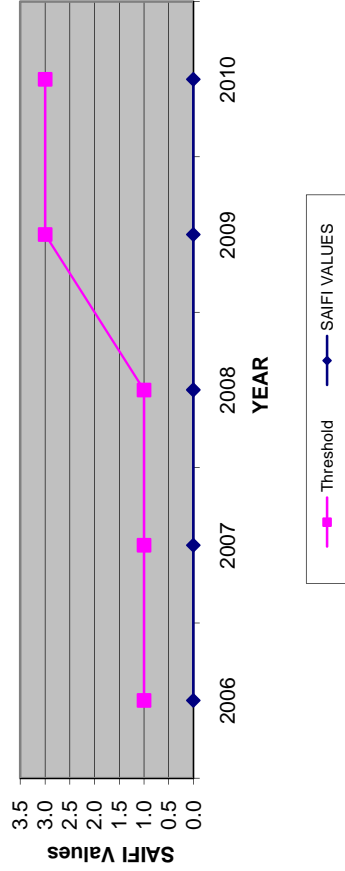
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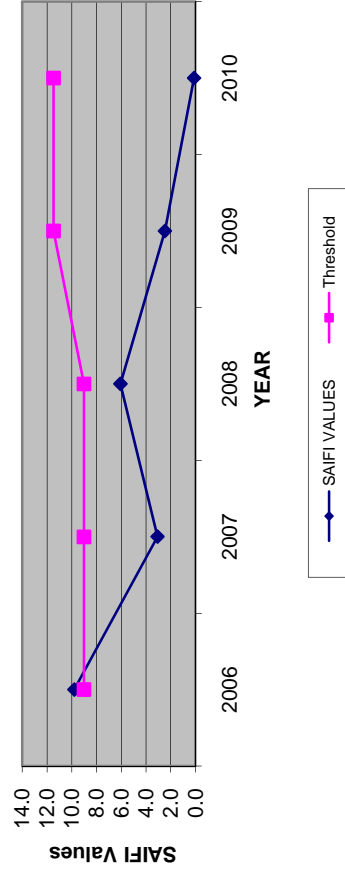
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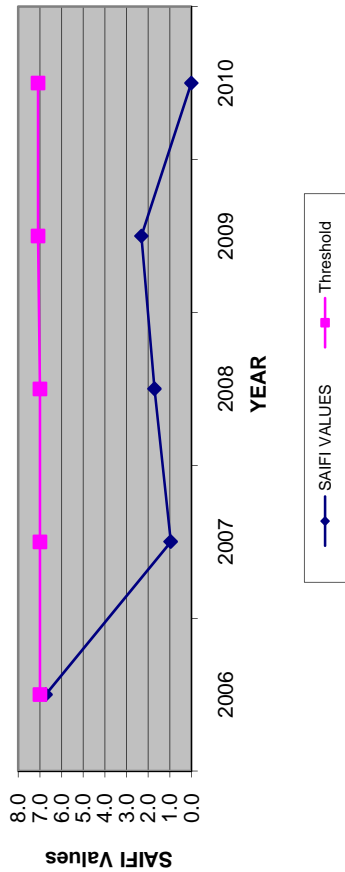
SAIFI Values For HCSU11



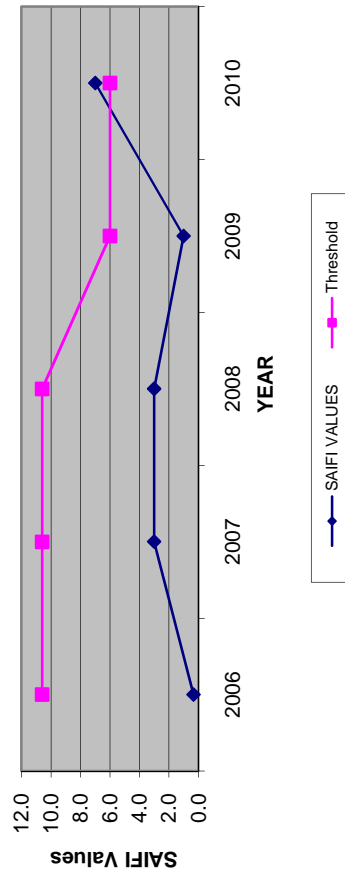
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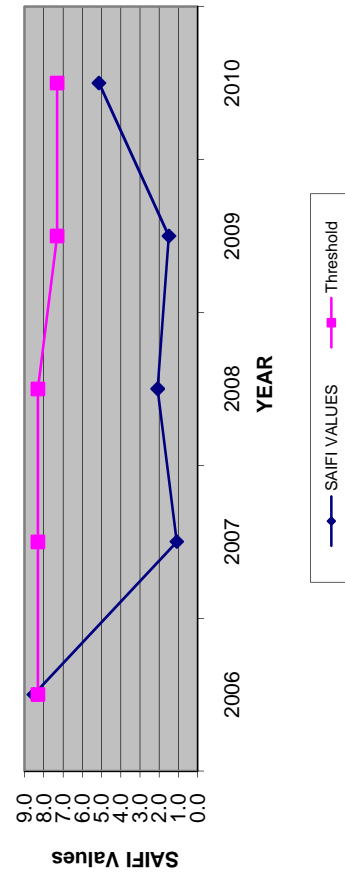
SAIFI Values For DUKE11



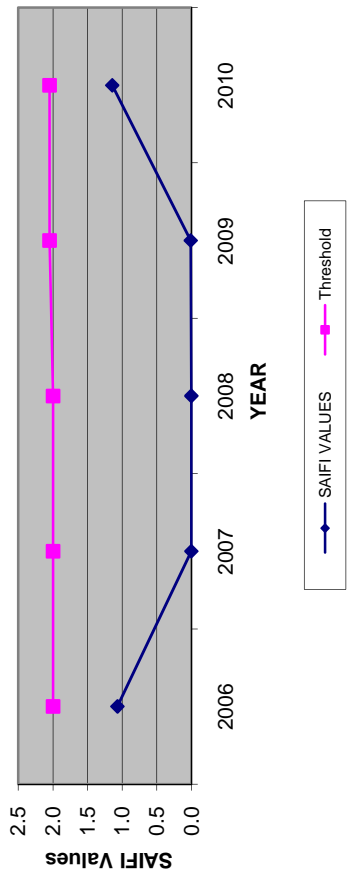
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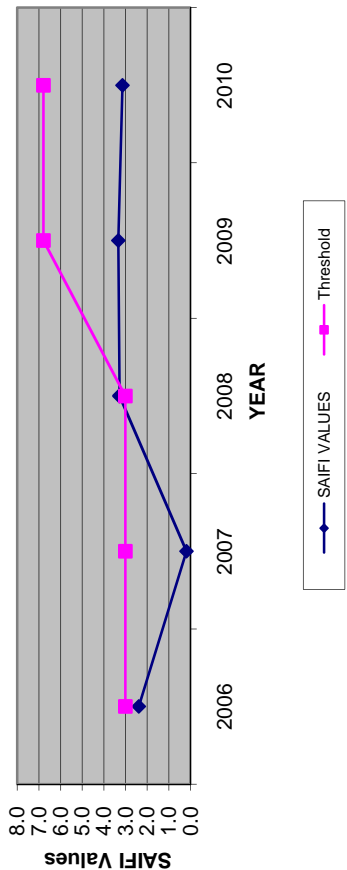
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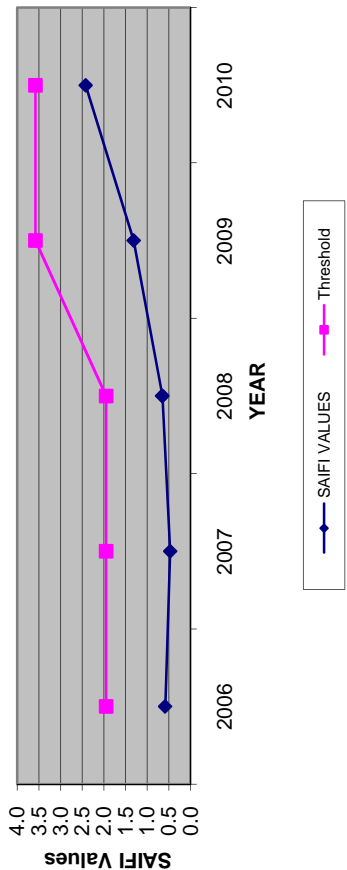
SAIFI Values For HGTM12



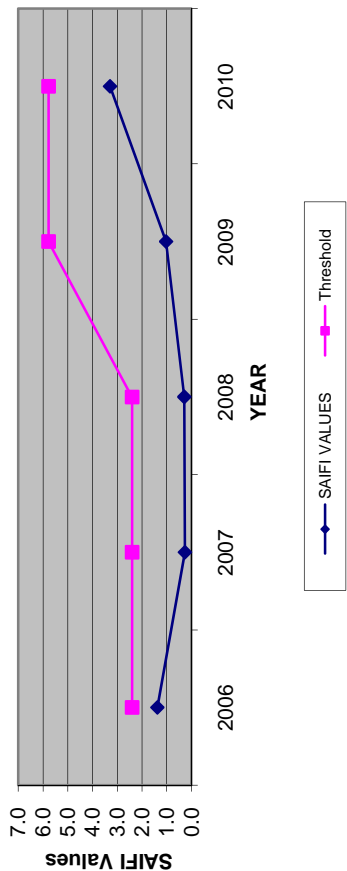
SAIFI Values For HOLY11



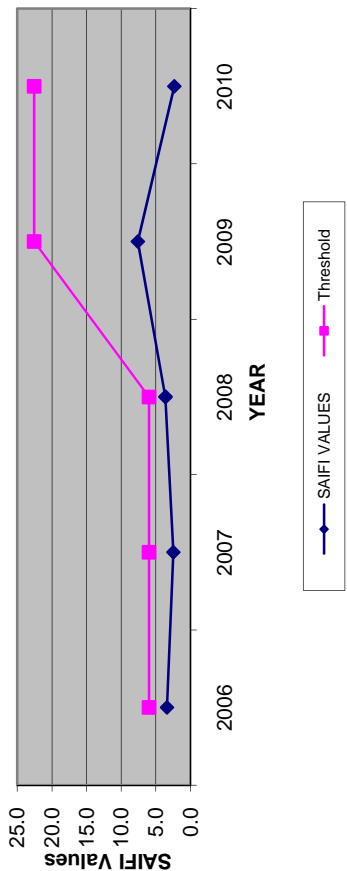
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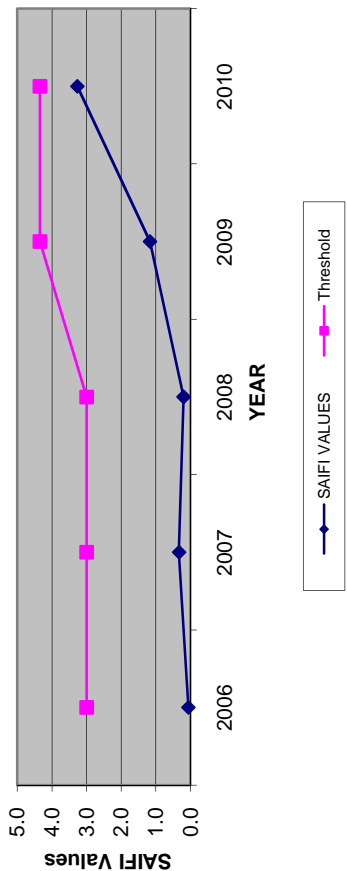
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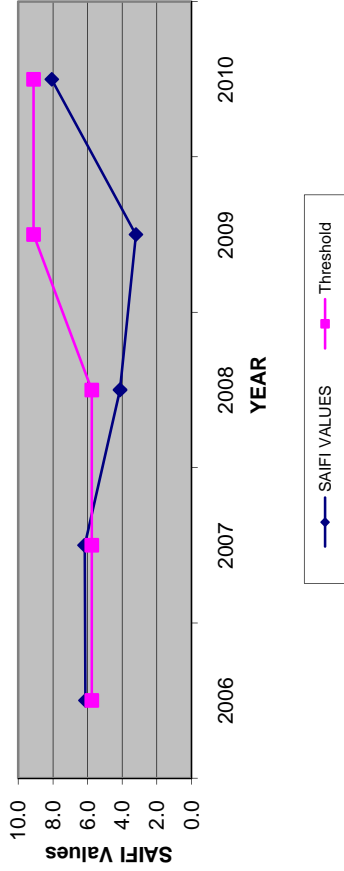
SAIFI Values For HMDL12



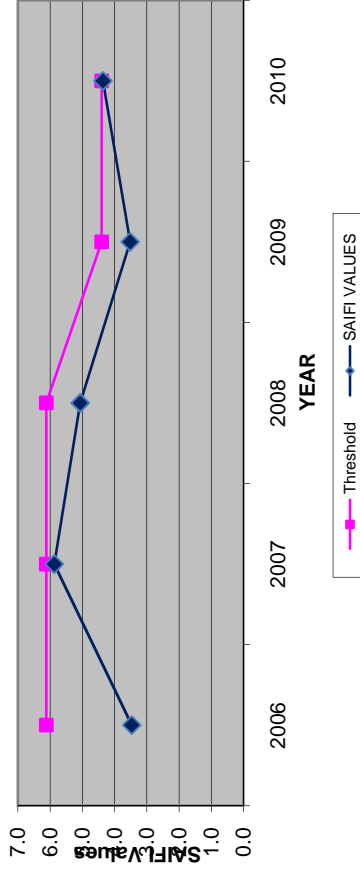
SAIFI Values For HOLY12



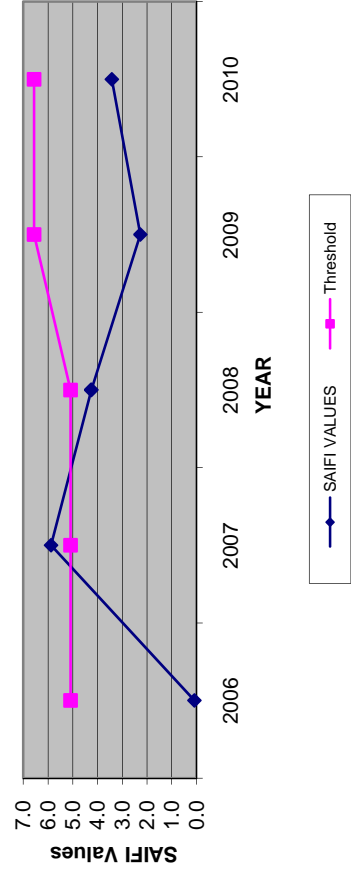
SAIFI Values For HRPR11



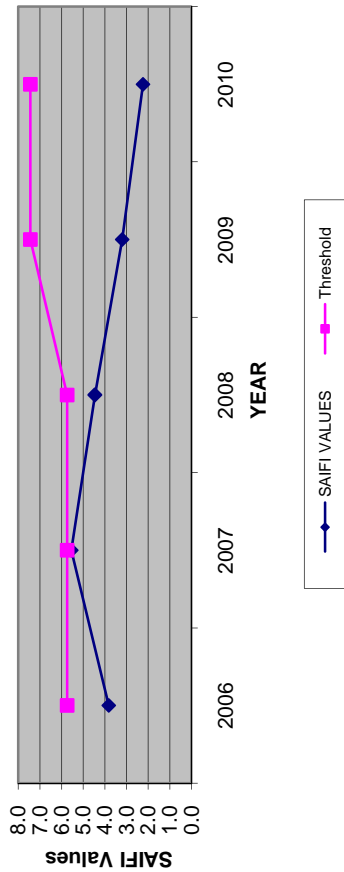
SAIFI Values For JMSN11



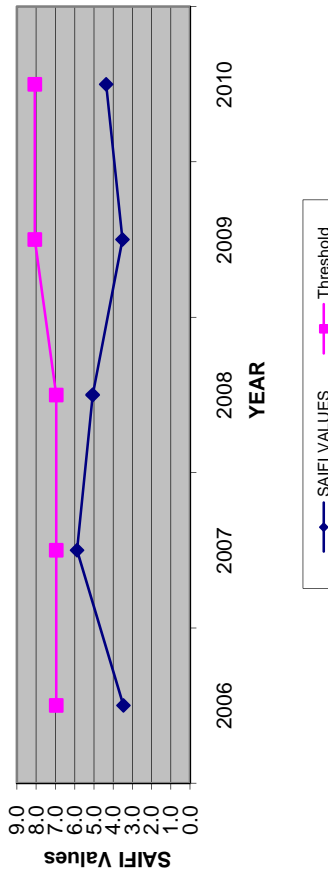
SAIFI Values For JNTA11



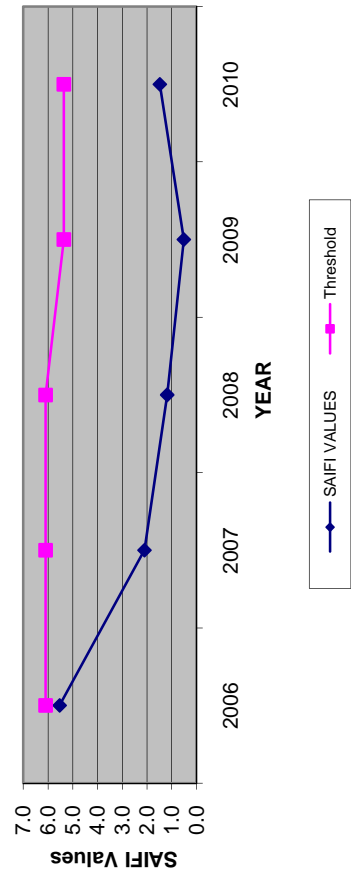
SAIFI Values For HOPE11



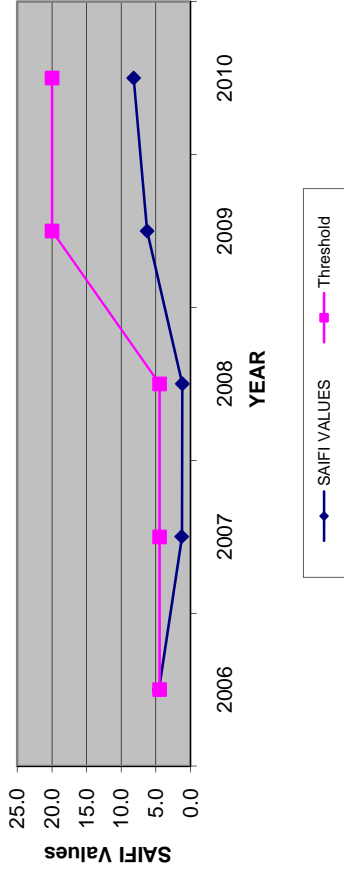
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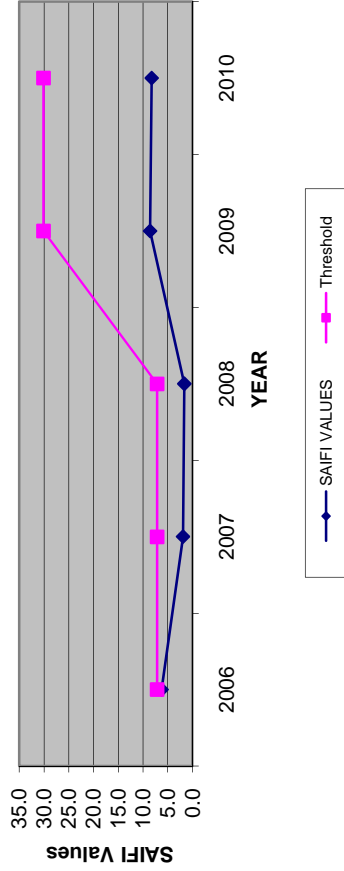
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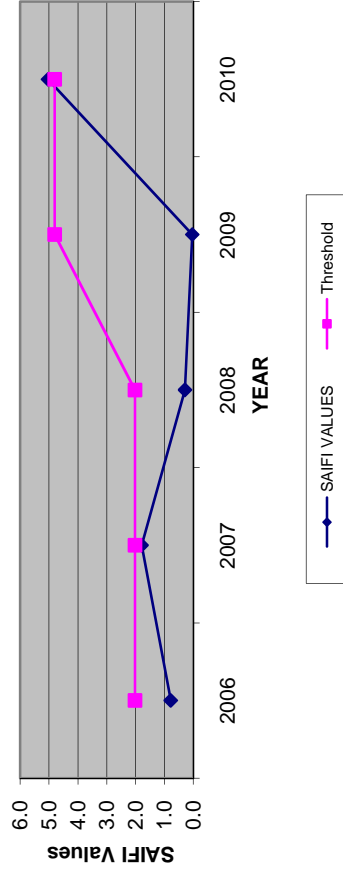
SAIFI Values For JNVY11



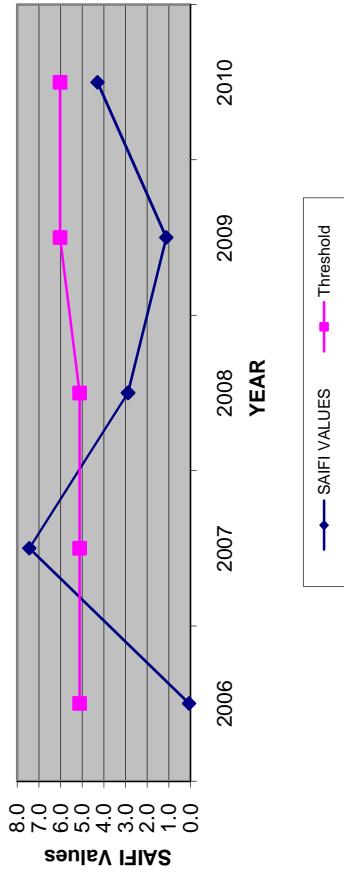
SAIFI Values For JNVY31



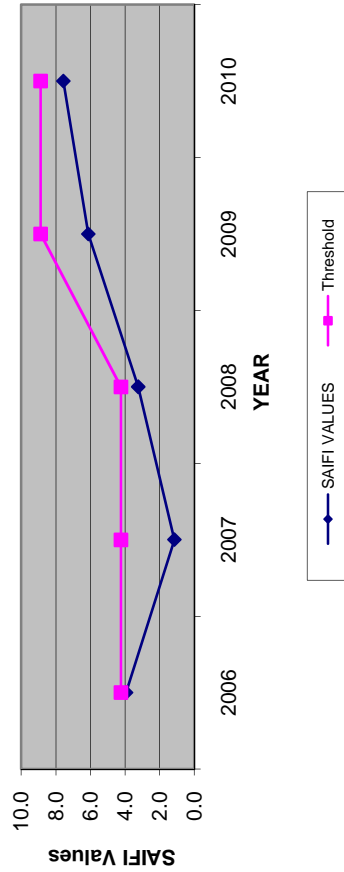
SAIFI Values For LIME12



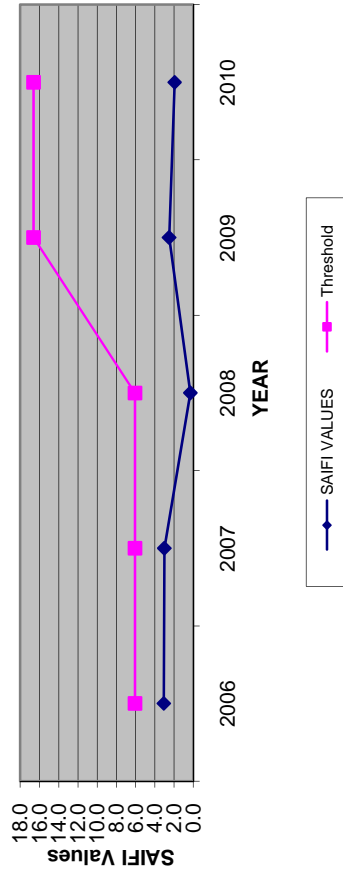
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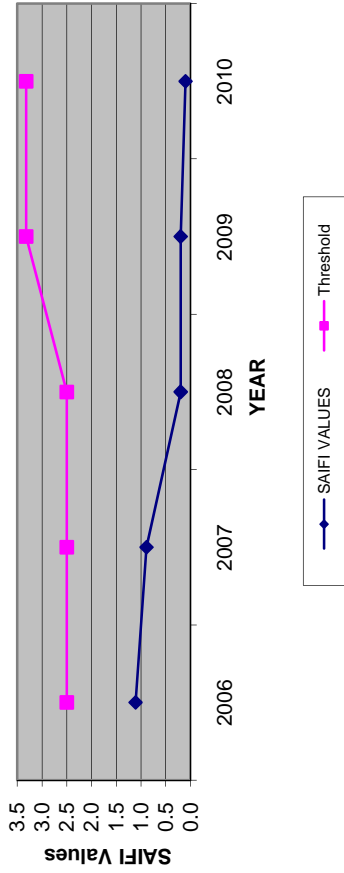
SAIFI Values For JNVY12



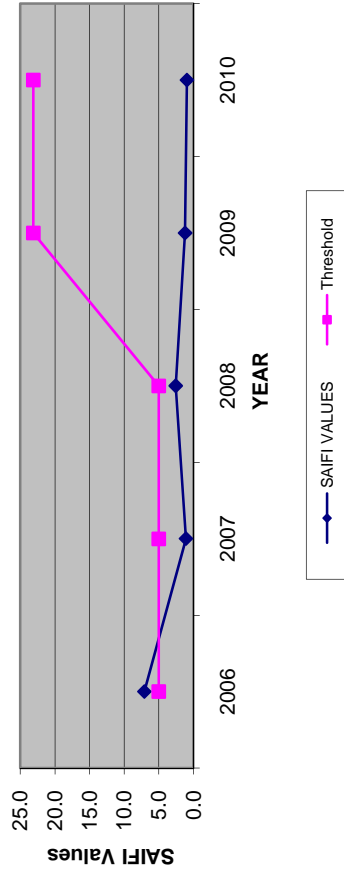
SAIFI Values For LIME11



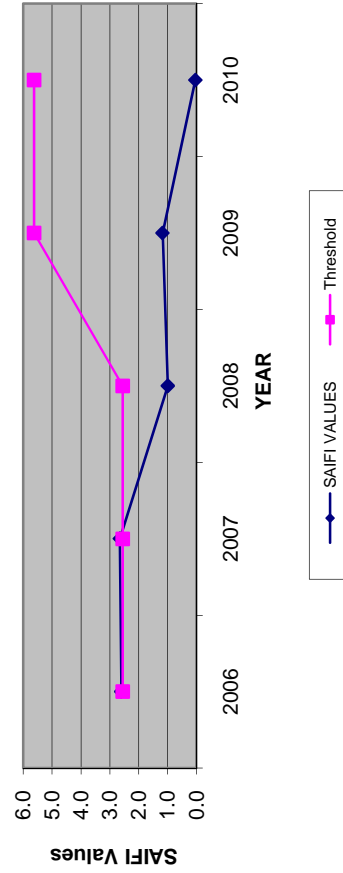
SAIFI Values For MRBT42



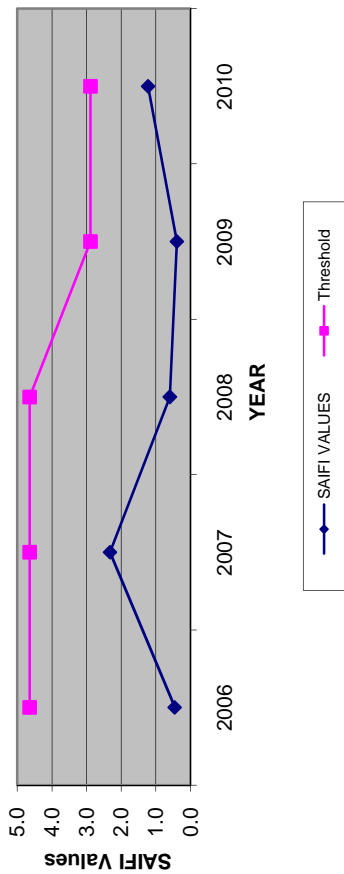
SAIFI Values For NYSA12



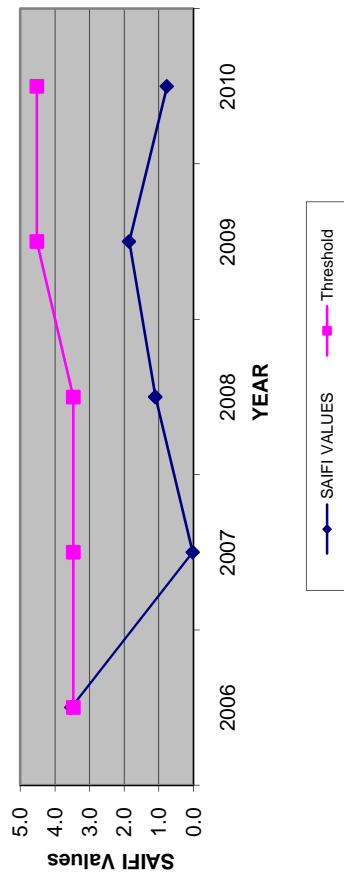
SAIFI Values For NYSA14



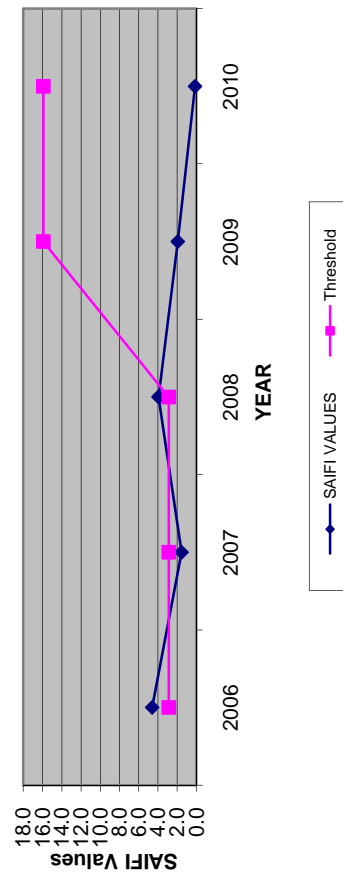
SAIFI Values For MRBT41



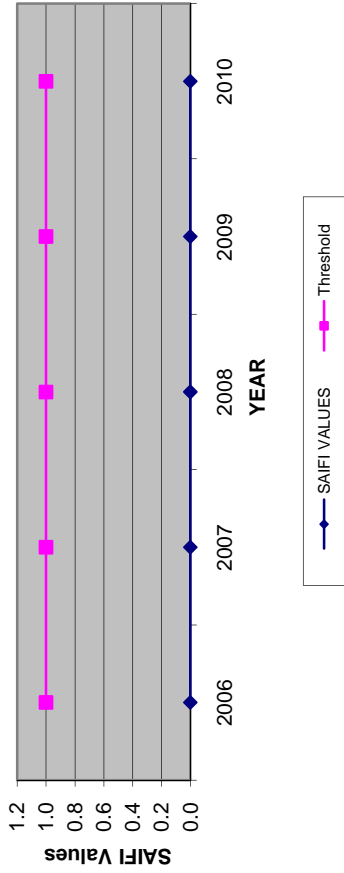
SAIFI Values For NYSA11



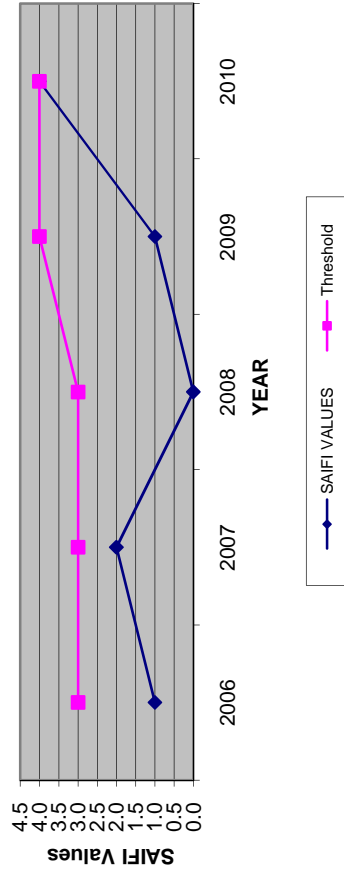
SAIFI Values For NYSA13



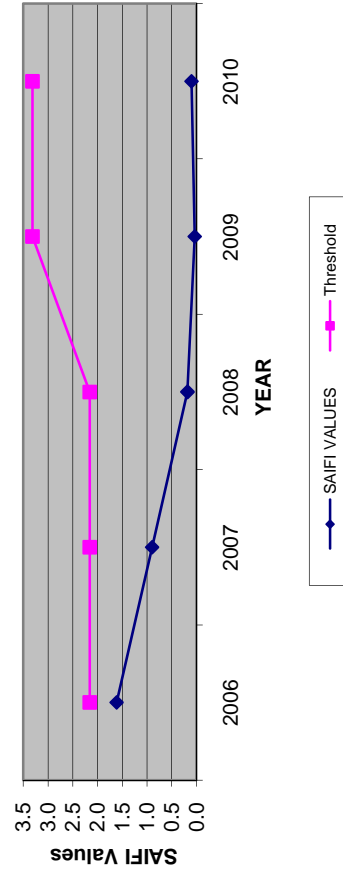
SAIFI Values For OBPR12



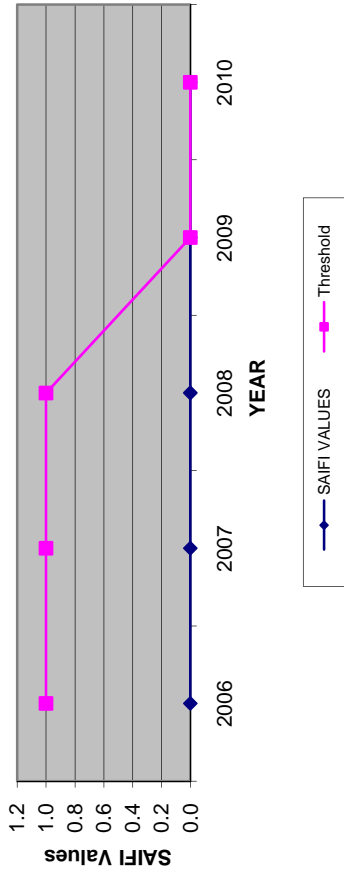
SAIFI Values For OIDA12



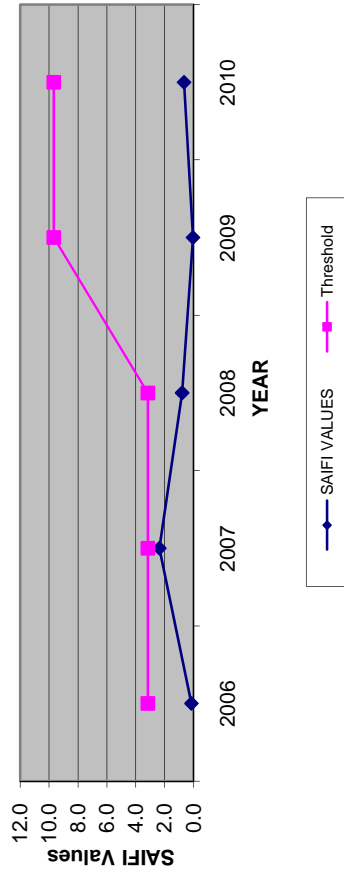
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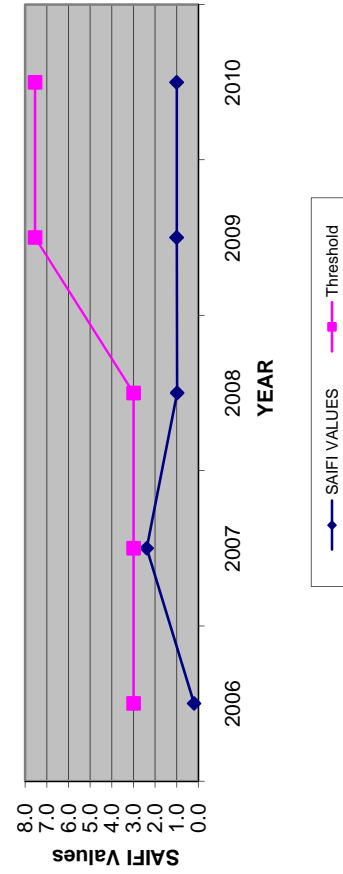
SAIFI Values For OBPR11



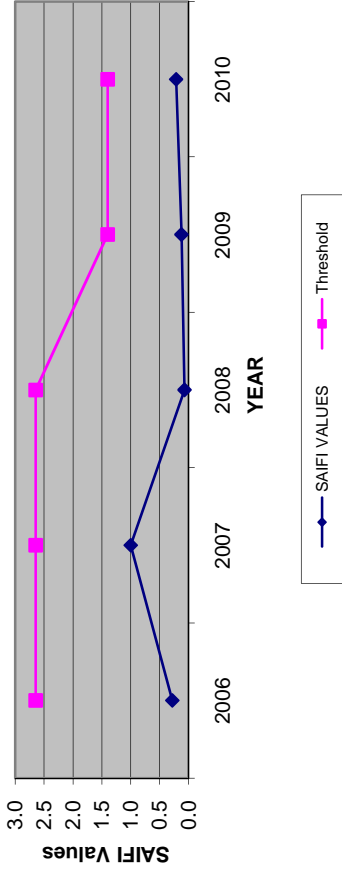
SAIFI Values For OIDA11



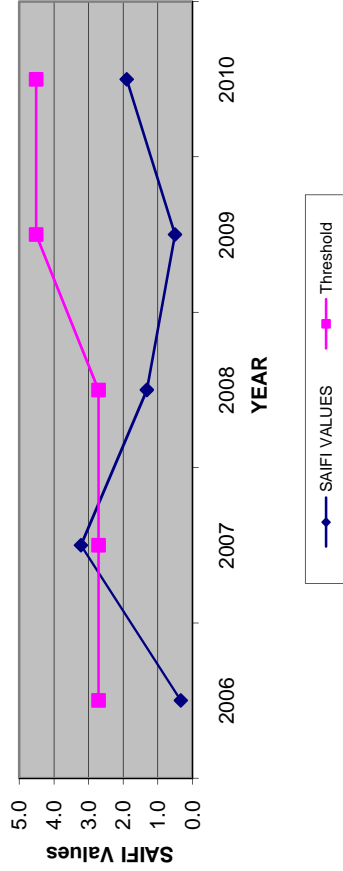
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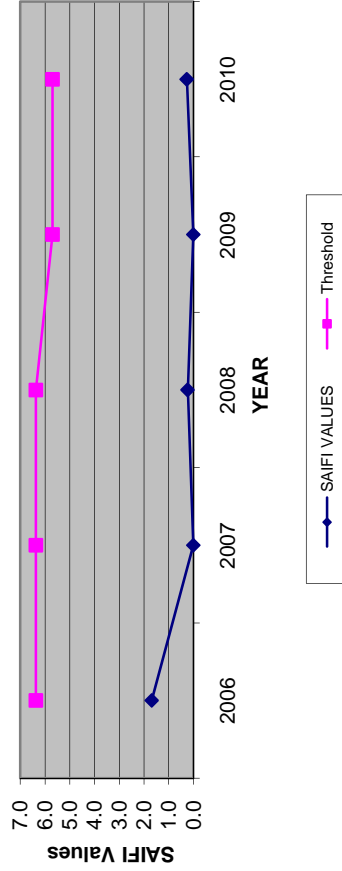
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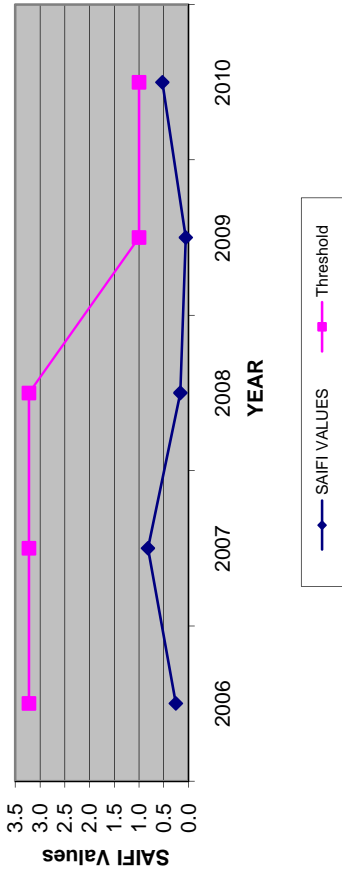
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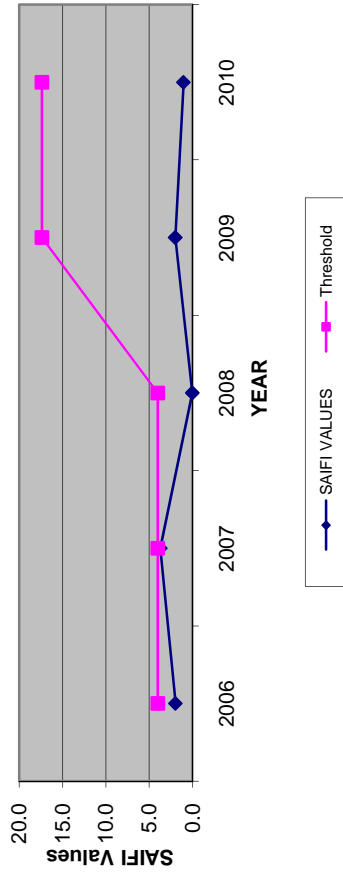
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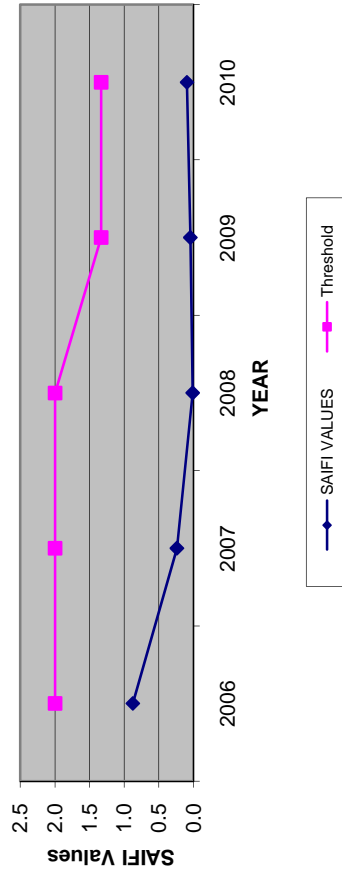
SAIFI Values For ONTO19



SAIFI Values For ONTO23

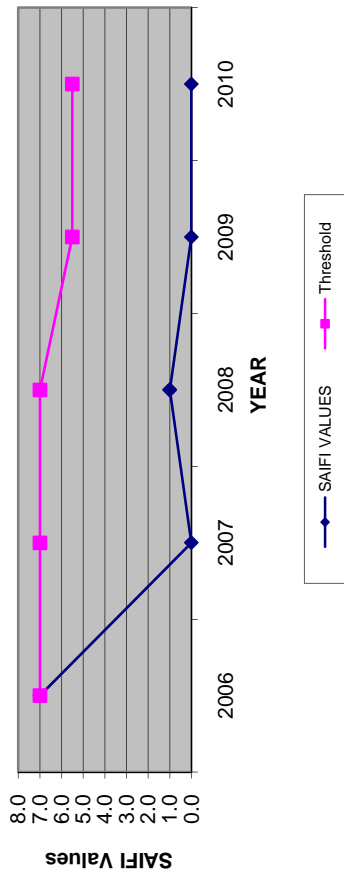


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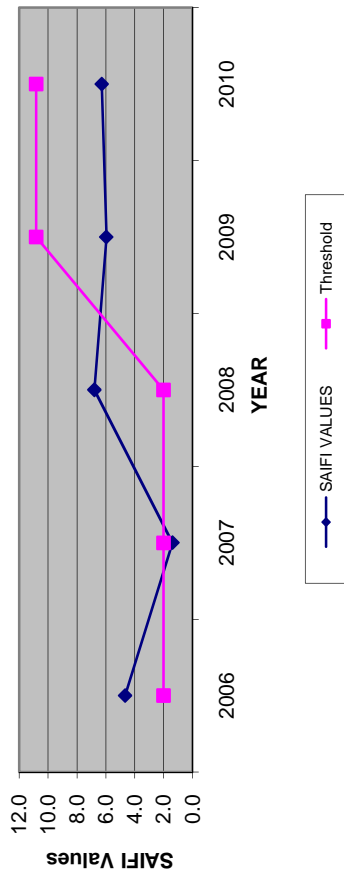




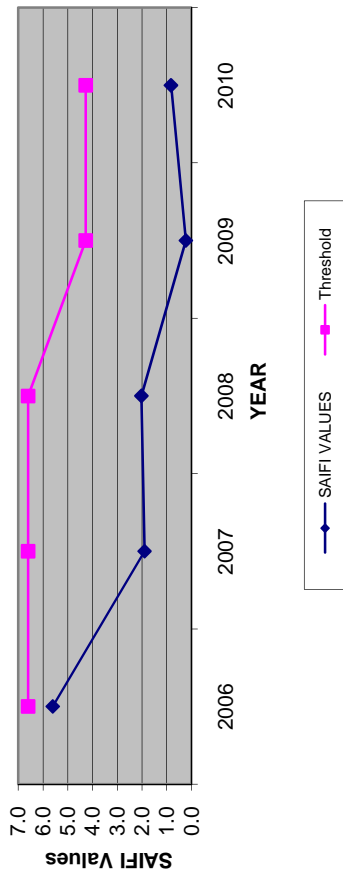
SAIFI Values For PNCK12



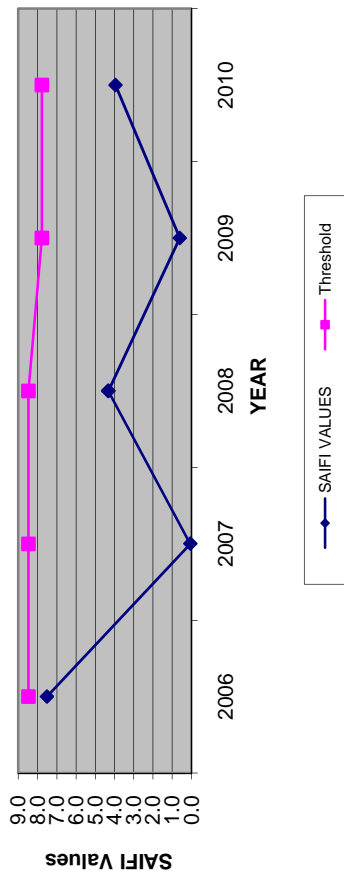
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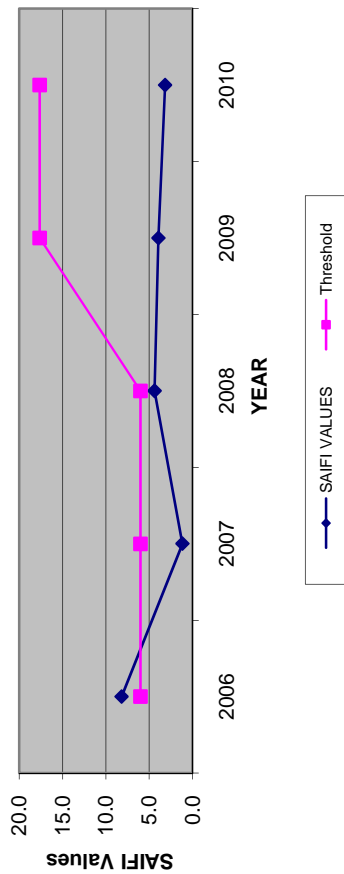
SAIFI Values For UNTY12



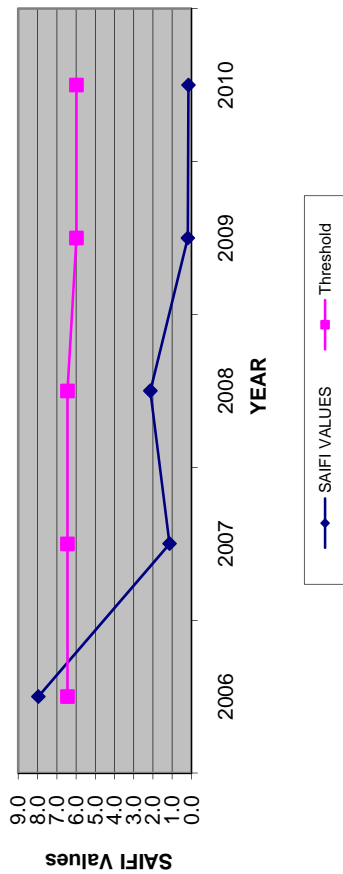
SAIFI Values For PNCK11



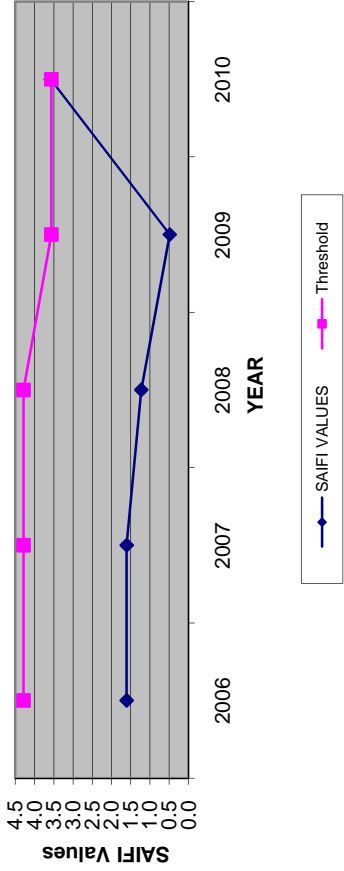
SAIFI Values For PRMA42



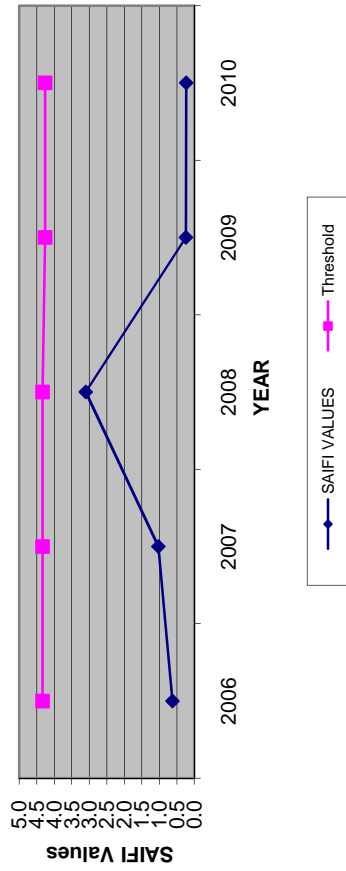
SAIFI Values For UNTY11



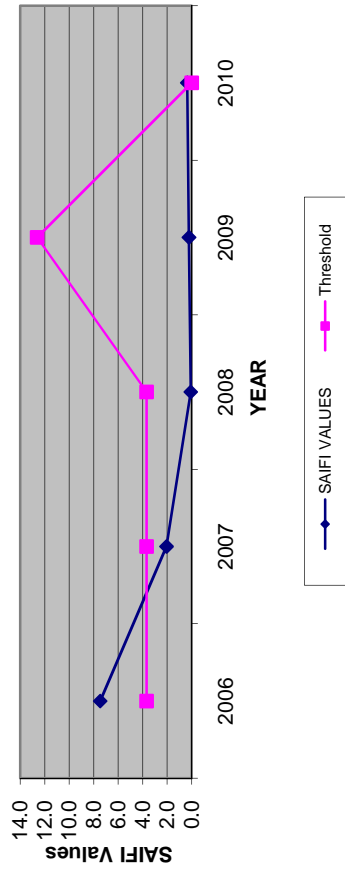
SAIFI Values For VALE13



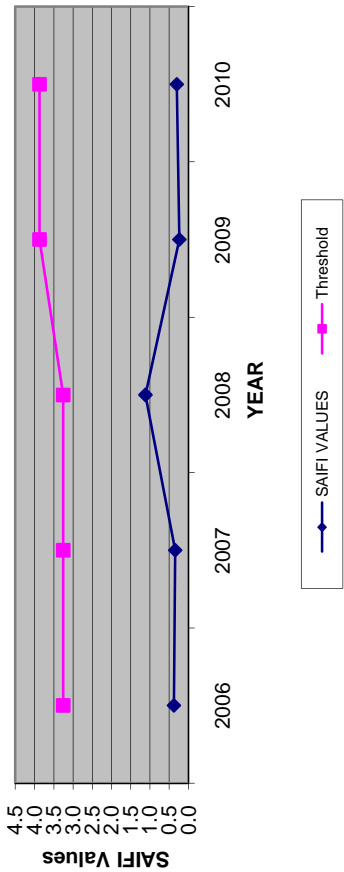
SAIFI Values For VALE15



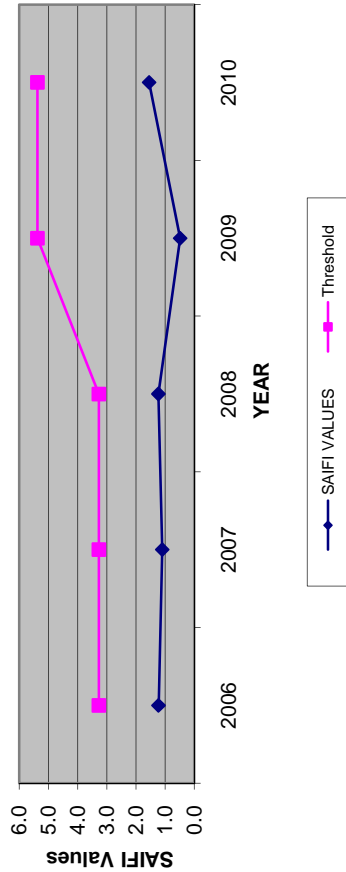
SAIFI Values For WESR14



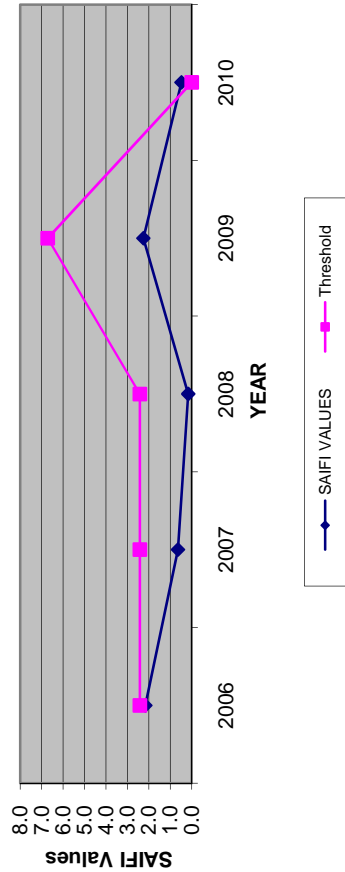
SAIFI Values For VALE11



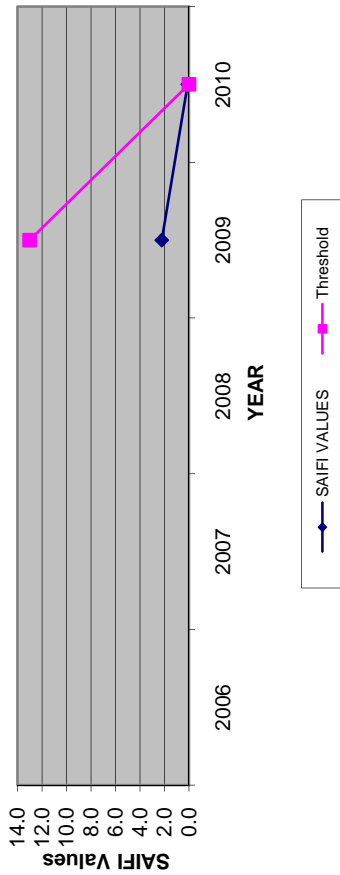
SAIFI Values For VALE14



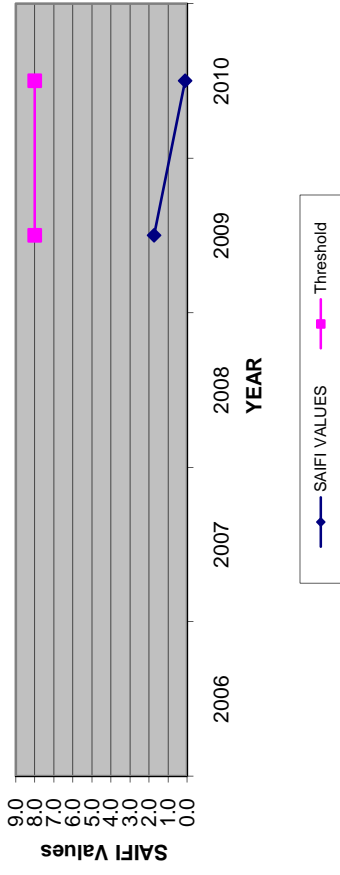
SAIFI Values For WESR13



SAIFI Values For ADRN11



SAIFI Values For ADRN12



5 Years of Sustained Interruption Causes

TABLE 5

CAUSE	NUMBER OF SUSTAINED INTERRUPTIONS					PERCENT OF TOTAL SUSTAINED INTERRUPTIONS				
	2006	2007	2008	2009	2010	2006	2007	2008	2009	2010
ADVERSE ENVIRONMENT	15	16	2	12	99	2.34	3.21	0.31	2.09	11.47%
ADVERSE WEATHER	134	59	48	40	**0	20.94	11.82	7.37	6.96	0.00%
CUSTOMERS EQUIPMENT	*60	*42	*15	*9	*7	0.00	0.00	0.00	0.00	0.00%
EQUIPMENT FAILURES	118	80	151	110	216	18.44	16.03	23.20	19.13	25.03%
FOREIGN INTERFERENCE	74	71	119	99	63	11.56	14.23	18.28	17.22	7.30%
HUMAN ELEMENT	7	21	36	7	20	1.09	4.21	5.53	1.22	2.32%
LIGHTNING	18	3	9	19	16	2.81	0.60	1.38	3.30	1.85%
LOSS OF SUPPLY	5	13	38	19	26	0.78	2.61	5.84	3.30	3.01%
MAJOR EVENTS	0	0	0	0	0	0.00	0.00	0.00	0.00	0.00%
SCHEDULED OUTAGES	69	91	112	64	155	10.78	18.24	17.20	11.13	17.96%
TREE CONTACTS	46	27	22	25	49	7.19	5.41	3.38	4.35	5.68%
UNKNOWN	154	118	114	180	219	24.06	23.65	17.51	31.30	25.38%
TOTAL	640	499	651	575	870	100.00	100.00	100.00	100.00	100.00%

\* = Not Included in Calculations

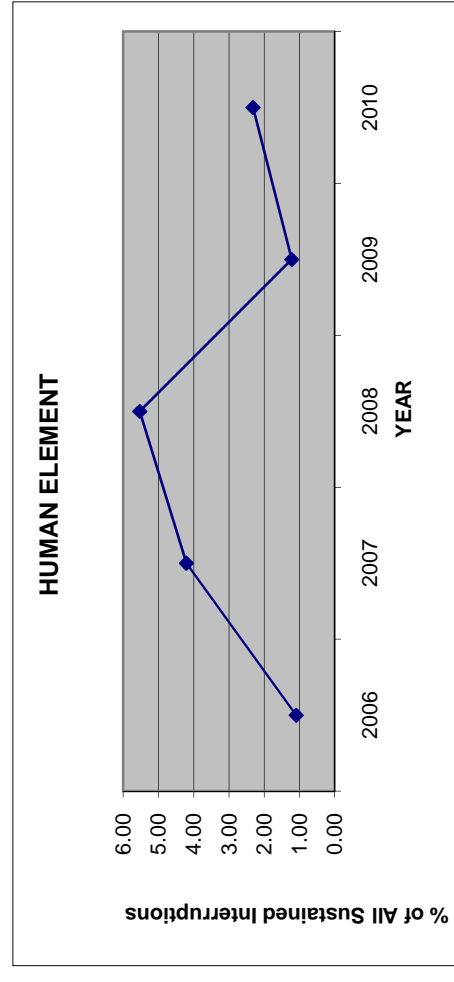
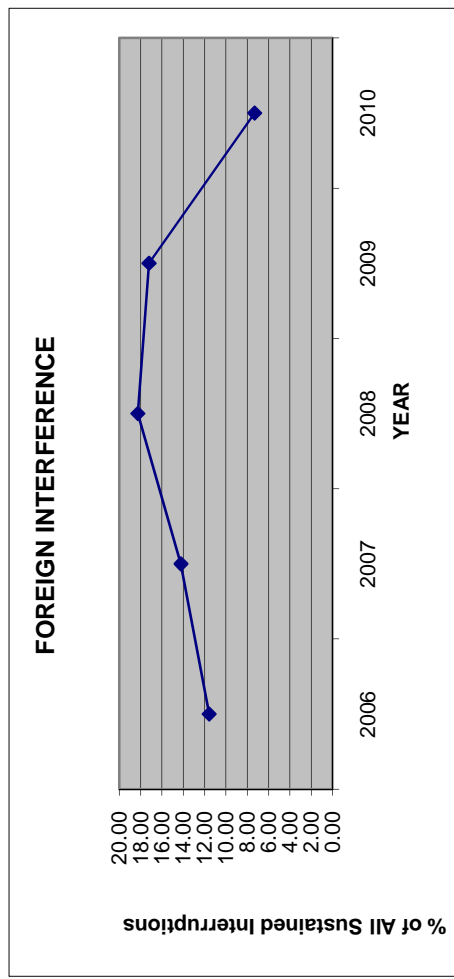
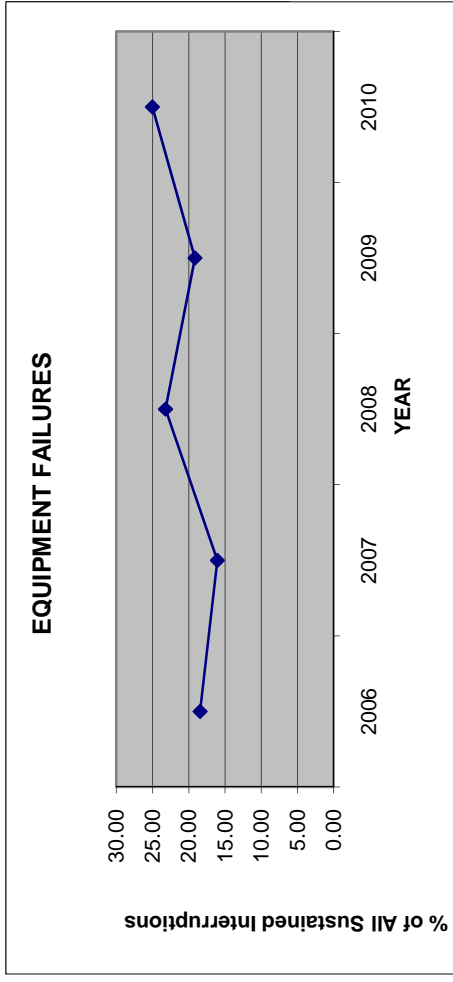
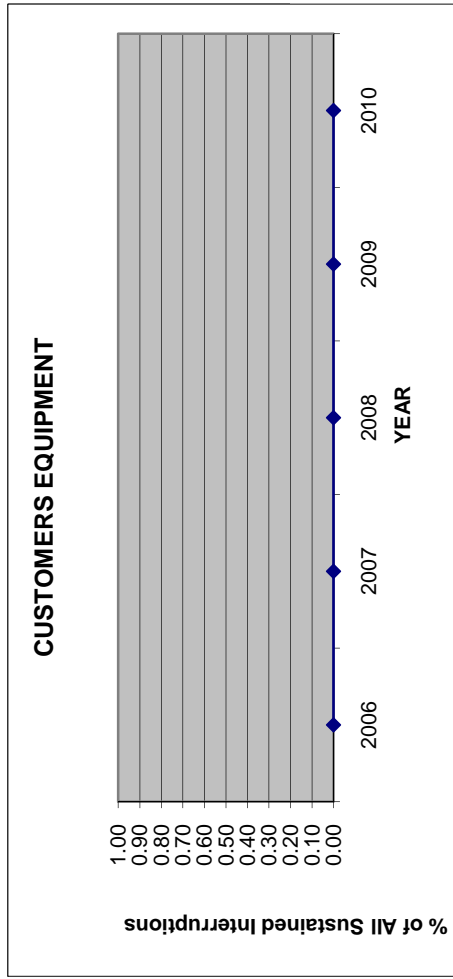
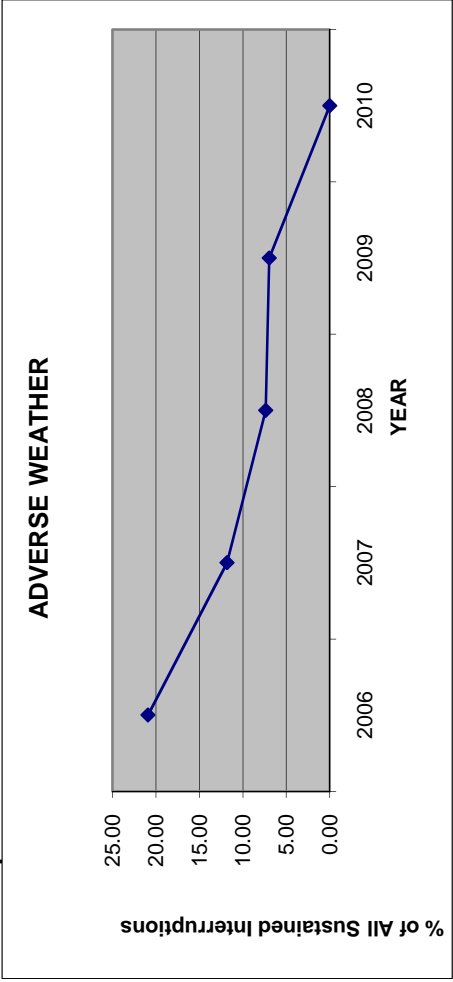
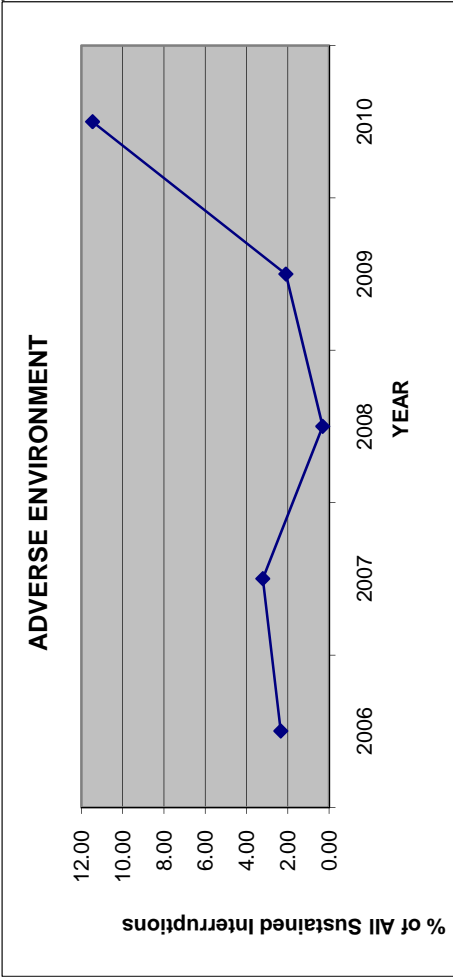
\*\*= On September 1 2010 we implemented new cause codes in an effort to better determine "Root Cause" of ourages. However, this change impacted our ability to filter for 2010 "Adverse Weather". We have made necessary adjustments to allow filtering for "adverse weather" in 2011 and beyond

2010 Sustained Interruption Cause Ranking

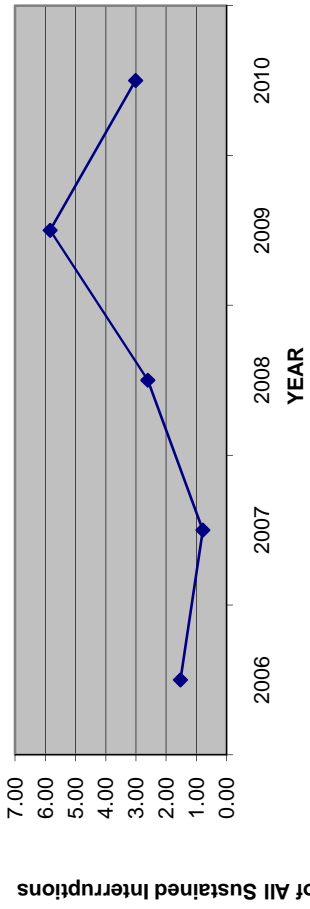
TABLE 6

CAUSE	OCCURRENCES	CUSTOMER HOURS OUT	OCCURRENCES RANKING	HOURS OUT RANKING
ADVERSE ENVIRONMENT	99	5456.86	4	5
ADVERSE WEATHER	0		0	0
CUSTOMERS EQUIPMENT	7	54.49	10	10
EQUIPMENT FAILURES	216	39324.85	2	1
FOREIGN INTERFERENCE	63	3866.69	5	6
HUMAN ELEMENT	20	1819.99	8	8
LIGHTNING	16	510.20	9	9
LOSS OF SUPPLY	26	2331.13	7	7
MAJOR EVENTS	0	0.00	11	11
SCHEDULED OUTAGES	155	13185.62	3	3
TREE CONTACTS	49	7322.43	6	4
UNKNOWN	219	17613.06	1	2
TOTAL	870	91485.31		

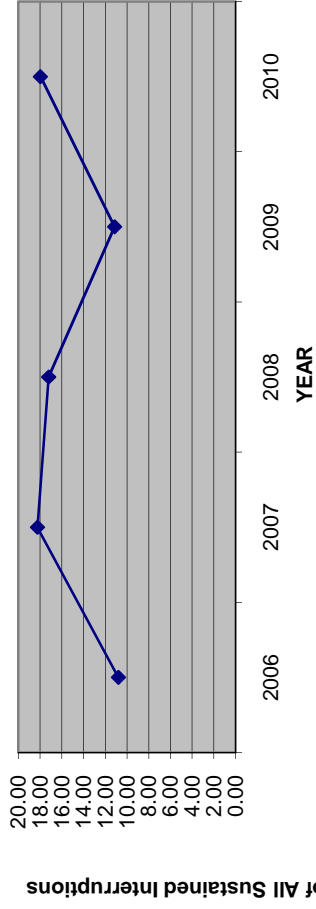
CHARTS for System Interruption Causes



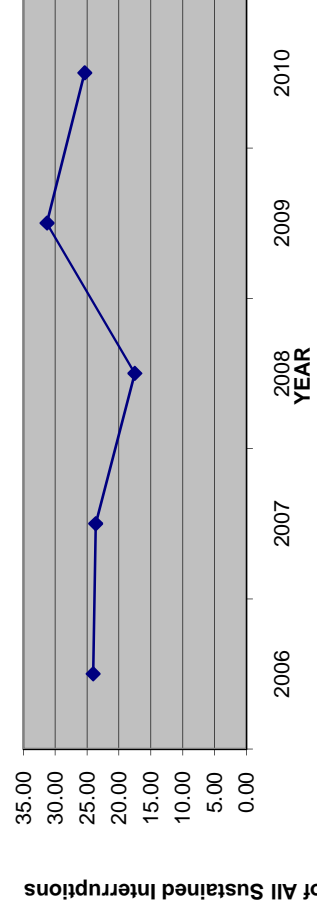
### LOSS OF SUPPLY



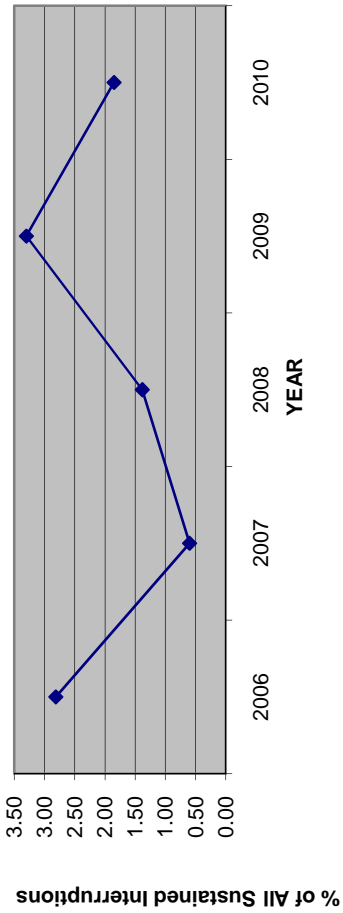
### SCHEDULED OUTAGES



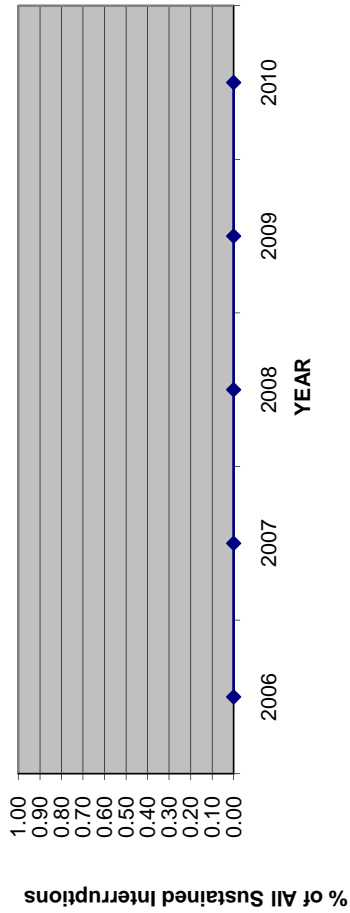
### UNKNOWN



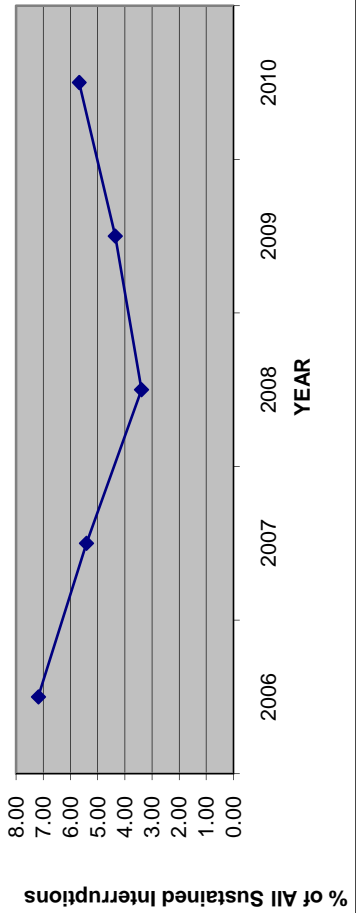
### LIGHTNING



### MAJOR EVENTS

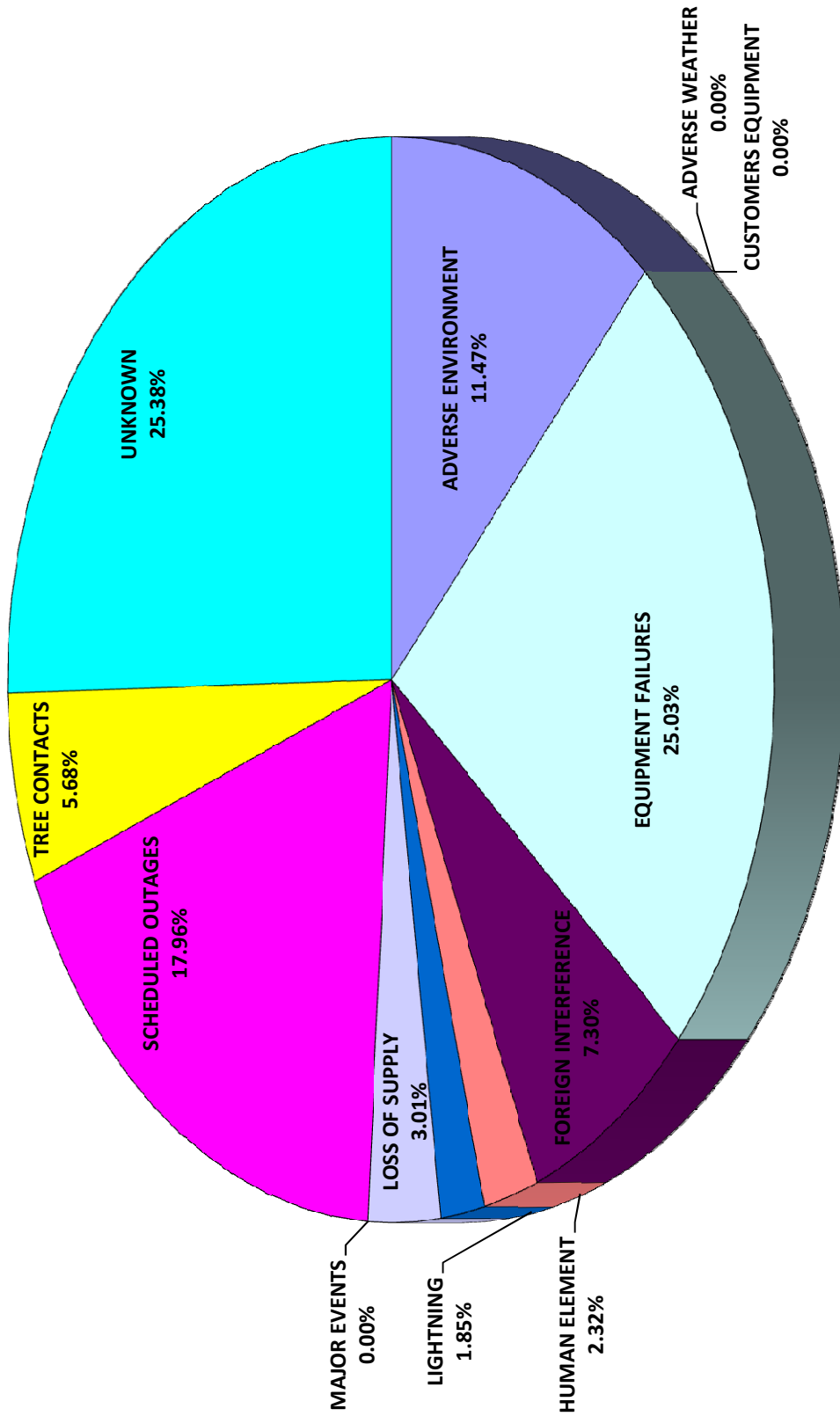


### TREE CONTACTS



yster

2010 Causes for Sustained Interruptions





Oregon Circuits Exceeding the Threshold Limit in 2010

TABLE 7

CIRCUIT	SAIDI VALUES		CIRCUIT	SAIFI VALUES		CIRCUIT	MAIFI <sub>E</sub> VALUES	
	2010	THRESHOLD		2010	THRESHOLD		2010	THRESHOLD
CARO13	1.75	1.45	ESTN11	7.00	6.00	HFVY11	15.60	14.95
CWVY12	50.35	14.19	LIME12	5.04	4.80	HMDL12	20.03	5.00
HFVY11	21.65	11.83	VALE13	3.58	3.57	HRPR12	23.07	22.95
JNVY12	44.29	28.11				JNTA12	20.00	18.97
LIME12	25.53	12.07				JNVY12	14.00	9.00
OIDA12	4.90	4.57				JNVY31	19.54	10.00
ONTO19	1.67	1.54				LIME11	4.77	4.00
						OBPR11	3.59	2.00
						ONTO24	14.00	7.81
						RKVL11	11.00	3.00
						UNTY11	14.00	13.00
						VALE13	10.37	5.82

Five Years of Line/Trench Miles Data

TABLE 8

<u>OH Line (Pole) Miles</u>		<u>UG Trench Miles</u>		<u>Distribution All Trench Miles</u>	
YEAR	MILES	YEAR	MILES	YEAR	MILES
2010	2,114.69	2010	92.13	2010	2,206.82
2009	2,120.26	2009	92.11	2009	2,215.54
2008	2,343.87	2008	84.36	2008	2,204.62
2007	2,298.29	2007	90.28	2007	2,208.01
2006	2,105.77	2006	85.71	2006	2,191.48

Transmission Line (Structure/Pole) Miles \*

<u>Customer Counts</u>		<u>OH/UG %</u>	
YEAR	MILES	COUNT	OH/UG %
2010	675.12	19,447	87/13
2009	667.75	19,493	87/13
2008	667.59	19,487	87/13
2007	662.21	19,543	88/12
2006	661.75	19,406	88/12

Notes:

\* Transmission line miles include some lines that do not directly serve customer load

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**WILLIAM E. AVERA**

**July 29, 2011**

**DIRECT TESTIMONY OF WILLIAM E. AVERA**

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<b>Exhibit 407: CAPM – Projected Bond Yield</b>	
<b>Exhibit 408: Electric Utility Risk Premium</b>	
<b>Exhibit 409: Comparable Earnings Approach</b>	
<b>Exhibit 410: Capital Structure</b>	

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. William E. Avera, 3907 Red River, Austin, Texas.

4 **Q. In what capacity are you employed?**

5 A. I am the President of FINCAP, Inc., a firm providing financial, economic, and policy  
6 consulting services to business and government.

7 **Q. Please describe your educational background and professional experience.**

8 A. I received a Bachelor of Arts degree with a major in economics from Emory  
9 University. After serving in the U.S. Navy, I entered the doctoral program in  
10 economics at the University of North Carolina at Chapel Hill. Upon receiving my  
11 Ph.D., I joined the faculty at the University of North Carolina and taught finance in the  
12 Graduate School of Business. I subsequently accepted a position at the University  
13 of Texas at Austin where I taught courses in financial management and investment  
14 analysis. I then went to work for International Paper Company in New York City as  
15 Manager of Financial Education, a position in which I had responsibility for all  
16 corporate education programs in finance, accounting, and economics.

17 In 1977, I joined the staff of the Public Utility Commission of Texas ("PUCT")  
18 as Director of the Economic Research Division. During my tenure at the PUCT, I  
19 managed a division responsible for financial analysis, cost allocation and rate design,  
20 economic and financial research, and data processing systems, and I testified in  
21 cases on a variety of financial and economic issues. Since leaving the PUCT, I have  
22 been engaged as a consultant. I have participated in a wide range of assignments  
23 involving utility-related matters on behalf of utilities, industrial customers,  
24 municipalities, and regulatory commissions. I have previously testified before the  
25 Federal Energy Regulatory Commission ("FERC"), as well as the Federal  
26 Communications Commission, the Surface Transportation Board (and its

1 predecessor, the Interstate Commerce Commission), the Canadian Radio-Television  
2 and Telecommunications Commission, and regulatory agencies, courts, and  
3 legislative committees in over 40 states, including the Public Utility Commission of  
4 Oregon (“OPUC” or “the Commission”).

5 In 1995, I was appointed by the PUCT to the Synchronous Interconnection  
6 Committee to advise the Texas legislature on the costs and benefits of connecting  
7 Texas to the national electric transmission grid. In addition, I served as an outside  
8 director of Georgia System Operations Corporation, the system operator for electric  
9 cooperatives in Georgia.

10 I have served as Lecturer in the Finance Department at the University of  
11 Texas at Austin and taught in the evening graduate program at St. Edward’s  
12 University for 20 years. In addition, I have lectured on economic and regulatory  
13 topics in programs sponsored by universities and industry groups. I have taught in  
14 hundreds of educational programs for financial analysts in programs sponsored by  
15 the Association for Investment Management and Research, the Financial Analysts  
16 Review, and local financial analysts societies. These programs have been  
17 presented in Asia, Europe, and North America, including the Financial Analysts  
18 Seminar at Northwestern University. I hold the Chartered Financial Analyst (CFA®)  
19 designation and have served as Vice President for Membership of the Financial  
20 Management Association. I have also served on the Board of Directors of the North  
21 Carolina Society of Financial Analysts. I was elected Vice Chairman of the National  
22 Association of Regulatory Commissioners (“NARUC”) Subcommittee on Economics  
23 and appointed to NARUC’s Technical Subcommittee on the National Energy Act. I  
24 have also served as an officer of various other professional organizations and  
25 societies. Exhibit 401 contains a resume presenting the details of my experience  
26 and qualifications.

1       **A.     Overview.**

2       **Q.     What is the purpose of your testimony in this case?**

3       A.     The purpose of my testimony is to present to the OPUC my independent evaluation  
4           of the fair rate of return on equity (“ROE”) for the jurisdictional utility operations of  
5           Idaho Power Company (“Idaho Power” or “the Company”). The overall rate of return  
6           applied to Idaho Power’s 2011 test year rate base is developed in the testimony of  
7           Mr. Steven R. Keen.

8       **Q.     Please summarize the information and materials you relied on to support the  
9           opinions and conclusions contained in your testimony.**

10      A.     To prepare my testimony, I used information from a variety of sources that would  
11           normally be relied upon by a person in my capacity. I am familiar with the  
12           organization, finances, and operations of Idaho Power from my participation in prior  
13           proceedings before the OPUC, the Idaho Public Utilities Commission (“IPUC”), and  
14           the FERC. In connection with the present filing, I considered and relied upon  
15           corporate disclosures and management discussions, publicly available financial  
16           reports and filings, and other published information relating to the Company and its  
17           parent, IDACORP, Inc. (“IDACORP”). I also reviewed information relating generally  
18           to current capital market conditions and specifically to current investor perceptions,  
19           requirements, and expectations for Idaho Power’s electric utility operations. These  
20           sources, coupled with my experience in the fields of finance and utility regulation,  
21           have given me a working knowledge of the issues relevant to investors’ required rate  
22           of return for Idaho Power, and they form the basis of my analyses and conclusions.

23      **Q.     What is the practical test of the reasonableness of the ROE used in setting a  
24           utility’s rates?**

25      A.     The ROE compensates investors for the use of their capital to finance the plant and  
26           equipment necessary to provide utility service. Investors commit capital only if they

1 expect to earn a return on their investment commensurate with returns available from  
2 alternative investments with comparable risks. To be consistent with sound  
3 regulatory economics and the standards set forth by the Supreme Court in the  
4 *Bluefield*<sup>1</sup> and *Hope*<sup>2</sup> cases, a utility's allowed ROE should be sufficient to: (1) fairly  
5 compensate the utility's investors; (2) enable the utility to offer a return adequate to  
6 attract new capital on reasonable terms; and (3) maintain the utility's financial  
7 integrity.

8 **Q. How did you evaluate a fair ROE for Idaho Power?**

9 A. I first reviewed the operations and finances of Idaho Power and the general  
10 conditions in the utility industry and the capital markets. With these as a  
11 background, I described the conceptual principles underlying investors' required rate  
12 of return and then conducted various well-accepted quantitative analyses to estimate  
13 the current cost of equity, including alternative applications of the discounted cash  
14 flow ("DCF"), the Capital Asset Pricing Model ("CAPM"), an equity risk premium  
15 approach based on allowed rates of return, as well as reference to comparable  
16 earned rates of return expected for utilities. Based on the cost of equity estimates  
17 indicated by my analyses, the Company's ROE was evaluated taking into account  
18 the specific risks and economic requirements for Idaho Power, as well as other  
19 factors (e.g., flotation costs) that are properly considered in setting a fair ROE for the  
20 Company.

21 **B. Summary of Conclusions.**

22 **Q. What are your findings regarding the fair rate of return on equity for Idaho**  
23 **Power?**

24  
25 <sup>1</sup> *Bluefield Water Works & Improvement Co. v. Pub. Serv. Comm'n*, 262 U.S. 679 (1923).

26 <sup>2</sup> *Fed. Power Comm'n v. Hope Natural Gas Co.*, 320 U.S. 591 (1944).



1 A. Based on the results of my analyses and the economic requirements necessary to  
2 support continuous access to capital, I recommend that Idaho Power be authorized a  
3 fair rate of return on equity in the range of a “bare bones” low end of 10.40 percent to  
4 a high end (including flotation costs) of 11.55 percent. The bases for my conclusion  
5 are summarized below:

6 • In order to reflect the risks and prospects associated with Idaho Power’s  
7 jurisdictional utility operations, my analyses focused on a proxy group of other  
8 utilities with comparable investment risks. Consistent with the fact that utilities must  
9 compete for capital with firms outside their own industry, I also referenced a proxy  
10 group of comparable risk companies in the non-utility sector of the economy;

11 • Because investors’ required return on equity is unobservable and no  
12 single method should be viewed in isolation, I applied the DCF, CAPM, and risk  
13 premium methods, as well as the comparable earnings approach, to estimate a fair  
14 ROE for Idaho Power;

15 • Based on the results of these analyses, and giving less weight to  
16 extremes at the high and low ends of the range, I concluded that the cost of equity  
17 for the proxy groups of utilities and non-utility companies is in the range of 10.4  
18 percent to 11.4 percent, or 10.55 percent to 11.55 percent after incorporating a  
19 minimal adjustment to account for the impact of common equity flotation costs;

20 • Considering the expected upward trend in capital costs and the need to  
21 support financial integrity and fund crucial capital investment even under adverse  
22 circumstances, it is my opinion that this 10.55 percent to 11.55 percent range bounds  
23 a reasonable rate of return on common equity for Idaho Power; and

24 • As reflected in the testimony of Mr. Keen, Idaho Power is requesting a  
25 fair ROE of 10.5 percent to balance customer impact during these challenging  
26 economic times with the Company’s need to maintain is financial integrity and

1 access to capital. This 10.5 percent ROE falls at the bottom end of my “bare bones”  
2 cost of equity range and, in my professional opinion, represents a reasonable, even if  
3 conservative, rate of return on common equity for Idaho Power.

4 **Q. What is your conclusion as to the reasonableness of the Company’s capital**  
5 **structure?**

6 A. Based on my evaluation, I concluded that a common equity ratio of approximately 51  
7 percent represents a reasonable basis from which to calculate Idaho Power’s overall  
8 rate of return. This conclusion was based on the following findings:

9 • Idaho Power’s proposed common equity ratio is entirely consistent with  
10 the range of capitalizations maintained by the firms in the proxy group of electric  
11 utilities at year-end 2010 and based on investors’ expectations; and

12 • My conclusion is reinforced by the investment community’s focus on the  
13 need for a greater equity cushion to accommodate higher operating risks, including  
14 the uncertainties posed by exposure to variable hydro conditions, and the pressures  
15 of capital investments. Financial flexibility plays a crucial role in ensuring the  
16 wherewithal to meet the needs of customers, and Idaho Power’s capital structure  
17 reflects the Company’s ongoing efforts to support its credit standing and maintain  
18 access to capital on reasonable terms.

19 **Q. What other evidence did you consider in evaluating your recommendation in**  
20 **this case?**

21 A. My recommendation was reinforced by the following findings:

22 • Sensitivity to financial market and regulatory uncertainties has increased  
23 dramatically and investors recognize that constructive regulation is a key ingredient  
24 in supporting utility credit standing and financial integrity;

25 • Because of Idaho Power’s reliance on hydroelectric generation, the  
26 Company is exposed to relatively greater risks of power cost volatility;

1           • Providing Idaho Power with the opportunity to earn a return that reflects  
2 these realities is an essential ingredient to support the Company’s financial position,  
3 which ultimately benefits customers by ensuring reliable service at lower long-run  
4 costs; and

5           • Continued support for Idaho Power’s financial integrity, including a  
6 reasonable ROE, is imperative to ensure that the Company has the capability to  
7 maintain an investment grade rating while confronting potential challenges  
8 associated with funding infrastructure development necessary to meet the needs of  
9 its customers.

## 10   **II. FUNDAMENTAL ANALYSES**

### 11   **Q.   What is the purpose of this section?**

12   A.   As a predicate to the quantitative analyses that I address later in this testimony, this  
13 section briefly reviews the operations and finances of Idaho Power. In addition, it  
14 examines the risks and prospects for the electric utility industry and conditions in the  
15 capital markets and the general economy. An understanding of the fundamental  
16 factors driving the risks and prospects of electric utilities is essential in developing an  
17 informed opinion of investors’ expectations and requirements that are the basis of a  
18 fair ROE.

#### 19       **A.   Idaho Power Company.**

### 20   **Q.   Briefly describe Idaho Power.**

21   A.   Idaho Power is a wholly-owned subsidiary of IDACORP and is principally engaged in  
22 providing integrated retail electric utility service in a 24,000 square mile area in  
23 southern Idaho and eastern Oregon. During 2010, Idaho Power’s energy deliveries  
24 totaled 15.5 million megawatt-hours. Sales to residential customers comprised 37  
25 percent of retail sales, with 28 percent to commercial, 23 percent to industrial end-  
26 users, and 12 percent attributable to irrigation pumping. Idaho Power also

1 participates in the wholesale power market and supplies firm wholesale power  
2 service under sales contracts. At year-end 2010, Idaho Power had total assets of  
3 \$4.6 billion, with total revenues amounting to approximately \$1.0 billion.

4 In addition to its thermal baseload and peaking units located in Wyoming,  
5 Nevada, Oregon, and Idaho, Idaho Power's existing generating units include 17  
6 hydroelectric generating plants located in southern Idaho and eastern Oregon. The  
7 electrical output of these hydro plants, which has a significant impact on total energy  
8 costs, is dependent on streamflows. Although Idaho Power estimates that  
9 hydroelectric generation is capable of supplying approximately 55 percent of total  
10 system requirements under normal conditions, the Company has experienced  
11 prolonged periods of persistent below-normal water conditions in the past.

12 Idaho Power's retail electric operations are subject to the jurisdiction of the  
13 OPUC and the IPUC, with the interstate jurisdiction regulated by FERC. Additionally,  
14 Idaho Power's hydroelectric facilities are subject to licensing under the Federal  
15 Power Act, which is administered by FERC, as well as the Oregon Hydroelectric Act.  
16 Relicensing is not automatic under federal law, and in order to successfully complete  
17 the process Idaho Power must demonstrate that it has operated its facilities in the  
18 public interest, which includes adequately addressing environmental concerns.

19 **Q. How are fluctuations in power costs caused by varying hydro and power**  
20 **market conditions accommodated in Idaho Power's rates?**

21 A. The OPUC has approved two mechanisms that allow Idaho Power to recover its  
22 variable power supply expenses: (1) the annual power cost update ("APCU") and (2)  
23 the Power Cost Adjustment Mechanism ("PCAM"). Rates resulting from the APCU  
24 filing reflect a combined adjustment based on forecasted, normalized, and actual  
25 power supply expenses. The PCAM is an annual true-up mechanism that tracks  
26

1 deviations between actual power costs and the power costs forecasted under the  
2 APCU.

3 Positive deviations between the Company's actual calendar year power costs  
4 and the APCU calculations (i.e., actual expenses are greater than amounts  
5 recovered) are reduced by the dollar equivalent of a 250 basis point reduction to the  
6 then-authorized ROE. Once reduced, 90 percent of the remaining excess power  
7 supply cost amount is deferred for subsequent recovery in rates. Negative  
8 deviations (i.e., actual expenses lower than amounts recovered) are reduced by the  
9 dollar equivalent of a 125 basis point reduction to the Company's then-authorized  
10 ROE. Once reduced, 90 percent of the remaining amount is deferred for possible  
11 refunds to customers.

12 Before any reductions or refunds are deferred under the PCAM, the  
13 Commission applies an earnings test. If earnings during the year that Idaho Power  
14 incurred the excess net variable power costs are within 100 basis points of the  
15 Company's authorized rate of return, no true-up amounts are added to the PCAM  
16 balancing account. If the Company's earnings are 100 basis points or more below its  
17 authorized ROE, the Company is allowed to add 90 percent of the eligible amounts  
18 to the PCAM balancing account, up to an earnings level that is 100 basis points less  
19 than the Company's authorized ROE. If earnings are more than 100 basis points  
20 above the Company's authorized ROE, the Company can include 90 percent of the  
21 eligible amounts as a credit to the balancing account, down to an earnings level that  
22 is 100 basis points above its authorized ROE.

23 **Q. What credit ratings have been assigned to Idaho Power?**

24 A. Idaho Power has been assigned a corporate credit rating of "BBB" by Standard &  
25 Poor's Corporation ("S&P") and an issuer rating of "Baa1" from Moody's Investor  
26 Services, Inc. ("Moody's").

1        **B.     Operating Risks.**

2        **Q.     How have investors' risk perceptions for the utility industry evolved?**

3        A.     Implementation of structural change, along with other factors impacting the economy  
4           and the industry, has caused investors to rethink their assessment of the relative  
5           risks associated with utilities. The past decade witnessed steady erosion in credit  
6           quality throughout the utility industry, both as a result of revised perceptions of the  
7           risks in the industry and the weakened finances of the utilities themselves. In  
8           December 2009, S&P observed with respect to the industry's future that:

9                                Looming costs associated with environmental compliance,  
10                                slack demand caused by economic weakness, the  
11                                potential for permanent demand destruction caused by  
12                                changes in consumer behavior and closing of  
                                      manufacturing facilities, and numerous regulatory filings  
                                      seeking recovery of costs are some of the significant  
                                      challenges the industry has to deal with.<sup>3</sup>

13        Similarly, Moody's noted:

14                                [A] sustained period of sluggish economic growth,  
15                                characterized by high unemployment, could stress the  
16                                sector's recovery prospects, financial performance, and  
17                                credit ratings. The quality of the sector's cash flows are  
                                      already showing signs of decline, partly because of higher  
                                      operating costs and investments.<sup>4</sup>

18                                More recently, Moody's concluded, "we also see the sector's overall business  
19                                and operating risks increasing."<sup>5</sup>

20        **Q.     How does Idaho Power's generating resource mix affect investors' risk  
21           perceptions?**

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22        <sup>3</sup> Standard & Poor's Corporation, "U.S. Regulated Electric Utilities Head into 2010 With Familiar  
23        Concerns," *RatingsDirect* (Dec. 28, 2009).

24        <sup>4</sup> Moody's Investors Service, "U.S. Electric Utilities: Uncertain Times Ahead; Strengthening  
25        Balance Sheets Now Would Protect Credit," *Special Comment* (Oct. 28, 2010).

26        <sup>5</sup> Moody's Investors Service, "Regulation Provides Stability as Risks Mount," *Industry Outlook*  
(Jan. 19, 2011).

1 A. Because approximately one-half of Idaho Power's total energy requirements are  
2 provided by hydroelectric facilities, the Company is exposed to a level of uncertainty  
3 not faced by most utilities. While hydropower confers advantages in terms of fuel  
4 cost savings and diversity, reduced hydroelectric generation due to below-average  
5 water conditions forces Idaho Power to rely more heavily on wholesale power  
6 markets or more costly thermal generating capacity to meet its resource needs. As  
7 S&P has observed:

8 A reduction in hydro generation typically increases an  
9 electric utility's costs by requiring it to buy replacement  
10 power or run more expensive generation to serve customer  
11 loads. Low hydro generation can also reduce utilities'  
12 opportunity to make off-system sales. At the same time,  
13 low hydro years increase regional wholesale power prices,  
14 creating potentially a double impact – companies have to  
15 buy more power than under normal conditions, paying  
16 higher prices.<sup>6</sup>

13 Uncertainties over water conditions are a persistent operational risk  
14 associated with Idaho Power. Investors recognize that volatile energy markets,  
15 unpredictable stream flows, and Idaho Power's reliance on wholesale purchases to  
16 meet a significant portion of its resource needs can expose the Company to the risk  
17 of reduced cash flows and unrecovered power supply costs. S&P noted that Idaho  
18 Power, along with Avista Corporation, "face the most substantial risks despite their  
19 PCAs and cost-update mechanisms,"<sup>7</sup> and recently concluded that Idaho Power's  
20 generation mix "exposes the company to substantial replacement power risk in the  
21 event of low water flows that lead to reduced generation."<sup>8</sup> Similarly, Moody's  
22

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23 <sup>6</sup> Standard & Poor's Corporation, "Pacific Northwest Hydrology and Its Impact on Investor-Owned  
24 Utilities' Credit Quality," *RatingsDirect* (Jan. 28, 2008).

25 <sup>7</sup> *Id.*

26 <sup>8</sup> Standard & Poor's Corporation, "Summary: Idaho Power Co.," *RatingsDirect* (Nov. 24, 2010).

1 observed that Idaho Power “has a high dependency . . . on hydro resources making  
2 it vulnerable to drought conditions.”<sup>9</sup> In addition to weather-related fluctuations in  
3 water flows, Idaho Power is also exposed to uncertainties regarding water rights and  
4 the administration of those rights.

5 **Q. Is the potential for energy market volatility an ongoing concern for investors?**

6 A. Yes. In recent years, utilities and their customers have had to contend with dramatic  
7 fluctuations in fuel costs due to ongoing price volatility in the spot markets, and  
8 investors recognize the potential for further turmoil in energy markets. In times of  
9 extreme volatility, utilities can quickly find themselves in a significant under-recovery  
10 position with respect to power costs, which can severely stress liquidity. The  
11 investment community also recognizes that financial performance can be negatively  
12 impacted when low wholesale prices impair revenues from surplus energy sales, as  
13 has been the case recently in the Pacific Northwest.<sup>10</sup>

14 While current expectations for significantly lower wholesale power prices  
15 reflect weaker fundamentals affecting current load and fuel prices, investors  
16 recognize the potential that such trends could quickly reverse. For example,  
17 heightened uncertainties in the Middle East have led to sharp increases in petroleum  
18 prices, and the potential ramifications of the Japanese nuclear crisis on the future  
19 cost and availability of nuclear generation in the U.S. have not been lost on  
20 investors. S&P observed that “short-term price volatility from numerous possibilities  
21 . . . is always possible,”<sup>11</sup> while Moody’s recognized that “the inherent volatility of

22 <sup>9</sup> Moody’s Investors Service, “Credit Opinion: Idaho Power Company,” *Global Credit Research*  
23 (Mar. 9, 2011).

24 <sup>10</sup> See, e.g., Standard & Poor’s Corporation, “Summary: Energy Northwest, Washington  
Bonneville Power Administration, Oregon; Wholesale Electric,” *RatingsDirect* (Apr. 27, 2011).

25 <sup>11</sup> Standard & Poor’s Corporation, “Top 10 Investor Questions: U.S. Regulated Electric Utilities,”  
26 *RatingsDirect* (Jan. 22, 2010).



1 commodity costs comprises one of the most significant risk factors to the industry,”<sup>12</sup>  
2 and concluded, “This view, that commodity prices remain low, could easily be proved  
3 incorrect, due to the evidence of historical volatility.”<sup>13</sup>

4 **Q. Do the APCU and PCAM completely shield Idaho Power from exposure to**  
5 **fluctuations in power supply costs?**

6 A. No. The investment community views the Company’s ability to periodically adjust  
7 retail rates to accommodate fluctuations in fuel costs as an important source of  
8 support for Idaho Power’s financial integrity. Nevertheless, they also recognize that  
9 there can still be a lag between the time Idaho Power actually incurs the expenditure  
10 and when it is recovered from ratepayers, during which the Company does not earn  
11 a return on its investment. This lag can impinge on the utility’s financial strength  
12 through reduced liquidity and higher borrowings. As a result, the Company is not  
13 insulated from the potential need to finance deferred fuel costs.<sup>14</sup> Moreover, under  
14 the earnings test applied by the OPUC, Idaho Power may be denied recovery  
15 altogether of a portion of its power costs, and under the sharing mechanism  
16 contained in the PCAM, deferrals are capped at 90 percent of eligible amounts. As a  
17 result, despite the significant investment of resources to manage fuel procurement,  
18 investors are aware that the best that Idaho Power can do is to recover something  
19 less than its actual costs during times of rising fuel costs. Finally, Idaho Power faces  
20 the possibility that there will be disallowances for imprudence in its fuel procurement.  
21 Similarly, as discussed in the testimony of Mr. Keen, Idaho Power devotes

22 <sup>12</sup> Moody’s Investors Service, “Credit Opinion: Avista Corp.,” *Global Research* (Mar. 17, 2011).

23 <sup>13</sup> Moody’s Investors Service, “U.S. Electric Utilities: Uncertain Times Ahead; Strengthening  
24 Balance Sheets Now Would Protect Credit,” *Special Comment* (Oct. 28, 2010).

25 <sup>14</sup> S&P has noted that the Company’s financial metrics have been negatively impacted in the past  
26 as a result of power cost deferrals. Standard & Poor’s Corporation, “Idaho Power Co.,”  
*RatingsDirect* (Feb. 1, 2008).

1 considerable resources to the administration of power purchase contracts (“PPAs”),  
2 which provide no opportunity to earn a return for shareholders.

3 **Q. What other financial pressures impact investors’ risk assessment of Idaho**  
4 **Power?**

5 A. Investors are aware of the financial and regulatory pressures faced by utilities  
6 associated with rising costs and the need to undertake significant capital  
7 investments. S&P noted that cost increases and capital projects, along with  
8 uncertain load growth, were a significant challenge to the utility industry.<sup>15</sup> As  
9 Moody’s observed:

[W]e also see the sector’s overall business risk and  
operating risks increasing, owing primarily to rising costs  
associated with upgrading and expanding the nation’s  
trillion dollar electric infrastructure.<sup>16</sup>

13 Similarly, S&P noted that cost increases and capital projects, along with  
14 uncertain load growth, were a significant challenge to the utility industry.<sup>17</sup> Providing  
15 the infrastructure necessary to meet the energy needs of customers imposes  
16 additional financial responsibilities on Idaho Power.

17 **Q. Does Idaho Power anticipate the need to access the capital markets going**  
18 **forward?**

19 A. Most definitely. Idaho Power will require capital investment to meet customer  
20 growth, provide for necessary maintenance and replacements of its utility  
21 infrastructure, as well as fund new investment in electric generation, transmission,

22 <sup>15</sup> Standard & Poor’s Corporation, “Industry Economic and Ratings Outlook,” *RatingsDirect* (Feb.  
23 2, 2010).

24 <sup>16</sup> Moody’s Investors Service, “Regulation Provides Stability as Risks Mount,” *Industry Outlook*  
(Jan. 19, 2011).

25 <sup>17</sup> Standard & Poor’s Corporation, “Industry Economic and Ratings Outlook,” *RatingsDirect* (Feb.  
26 2, 2010).

1 and distribution facilities. Idaho Power is in a period of significant infrastructure  
2 development and has several major projects in development, including construction  
3 of the 300 megawatt Langley Gulch power plant, which is expected to achieve  
4 commercial operation in the summer of 2012.

5 As Moody's noted, "IPC's capital expenditures are expected to range from  
6 \$775 - \$805 million over the next three years."<sup>18</sup> Investors are aware of the  
7 challenges posed by rising costs and burdensome capital expenditure requirements,  
8 especially in light of ongoing capital market and economic uncertainties. Support for  
9 Idaho Power's financial integrity and flexibility will be instrumental in attracting the  
10 capital necessary to fund these projects in an effective manner.

11 **Q. What other considerations affect investors' evaluation of Idaho Power?**

12 A. Utilities are confronting increased environmental pressures that create significant  
13 uncertainties and could impose substantial costs. Moody's noted that "the prospect  
14 for new environmental emission legislation – particularly concerning carbon dioxide –  
15 represents the biggest emerging issue for electric utilities."<sup>19</sup> While the momentum  
16 for carbon emissions legislation has slowed, expectations for eventual regulations  
17 continue to pose uncertainty. Fitch recently concluded, "Prospects of costly  
18 environmental regulations will create uncertainty for investors in the electricity  
19 business in 2011."<sup>20</sup> Moody's observed that "increasingly stringent environmental  
20 mandates" are a key risk confronting Idaho Power.<sup>21</sup>

21 <sup>18</sup> Moody's Investors Service, "Credit Opinion: Idaho Power Company," *Global Credit Research*  
22 (Mar. 9, 2011).

23 <sup>19</sup> Moody's Investors Service, "U.S. Investor-Owned Electric Utilities," *Industry Outlook* (Jan.  
2009).

24 <sup>20</sup> Fitch Ratings Ltd., "2011 Outlook: U.S. Utilities, Power, and Gas," *Global Power North America*  
*Special Report* (Dec. 20, 2010).

25 <sup>21</sup> Moody's Investors Service, "Credit Opinion: Idaho Power Company," *Global Credit Research*  
26 (Mar. 9, 2011).

1 **Q. Do investors consider Idaho Power's relative size in their assessment of the**  
2 **Company's risks and prospects?**

3 A. Yes. A firm's relative size has important implications for investors in their evaluation  
4 of alternative investments, and it is well established that smaller firms are more risky  
5 than larger firms. With a market capitalization of approximately \$1.8 billion, Idaho  
6 Power is one of the smallest publicly traded electric utilities followed by The Value  
7 Line Investment Survey ("Value Line"), which have an average capitalization of  
8 approximately \$7.3 billion.<sup>22</sup>

9 The magnitude of the size disparity between Idaho Power and other firms in  
10 the utility industry has important practical implications with respect to the risks faced  
11 by investors. All else being equal, it is well accepted that smaller firms are more  
12 risky than their larger counterparts, due in part to their relative lack of diversification  
13 and lower financial resiliency.<sup>23</sup> These greater risks imply a higher required rate of  
14 return, and there is ample empirical evidence that investors in smaller firms realize  
15 higher rates of return than in larger firms.<sup>24</sup> Common sense and accepted financial  
16 doctrine hold that investors require higher returns from smaller companies, and  
17 unless that compensation is provided in the rate of return allowed for a utility, the  
18 legal tests embodied in the *Hope* and *Bluefield* cases cannot be met.

19 **C. Impact of Capital Market Conditions.**

20 **Q. What are the implications of recent capital market conditions?**

21 <sup>22</sup> [www.valueline.com](http://www.valueline.com) (Retrieved Mar. 25, 2011).

22 <sup>23</sup> It is well established in the financial literature that smaller firms are more risky than larger firms.  
23 See, e.g., Eugene F. Fama and Kenneth R. French, "The Cross-Section of Expected Stock Returns,"  
24 *The Journal of Finance* (June 1992); George E. Pinches, J. Clay Singleton, and Ali Jahankhani,  
24 "Fixed Coverage as a Determinant of Electric Utility Bond Ratings," *Financial Management* (Summer  
1978).

25 <sup>24</sup> See, e.g., Rolf W. Banz, "The Relationship Between Return and Market Value of Common  
26 Stocks," *Journal of Financial Economics* (September 1981) at 16.

1 A. The deep financial and real estate crisis that the country experienced in late 2008,  
2 and continuing into 2009, led to unprecedented price fluctuations in the capital  
3 markets as investors dramatically revised their risk perceptions and required returns.  
4 As a result of investors' trepidation to commit capital, stock prices declined sharply  
5 while the yields on corporate bonds experienced a dramatic increase.

6 With respect to utilities specifically, as of June 2011, the Dow Jones Utility  
7 Average stock index remained approximately 17 percent below the previous high  
8 reached in May 2008. The prolonged sell-off in common stocks and sharp  
9 fluctuations in utility bond yields reflect the fact that the utility industry is not immune  
10 to the impact of financial market turmoil and the ongoing economic downturn. As the  
11 Edison Electric Institute noted in a letter to congressional representatives in  
12 September 2008 as the financial crisis intensified, capital market uncertainties have  
13 serious implications for utilities and their customers:

14 In the wake of the continuing upheaval on Wall Street,  
15 capital markets are all but immobilized, and short-term  
16 borrowing costs to utilities have already increased  
17 substantially. If the financial crisis is not resolved quickly,  
18 financial pressures on utilities will intensify sharply,  
19 resulting in higher costs to our customers and, ultimately,  
20 could compromise service reliability.<sup>25</sup>

21 While conditions have improved significantly since the depths of the crisis,  
22 investors have nonetheless had to confront ongoing fluctuations in share prices and  
23 stress in the credit markets. As the Wall Street Journal noted in February 2010:

24 Stocks pulled out of a 167-point hole with a late rally  
25 Friday, capping a wild week reminiscent of the most  
26 volatile days of the credit crisis.

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<sup>25</sup> Letter to House of Representatives, Thomas R. Kuhn, President, Edison Electric Institute (Sep. 24, 2008).

1 It was a return to the unusual relationships, or correlations,  
2 seen at major flash points over the past two years when  
3 investors fled risky assets and jumped into safe havens.  
4 This market behavior, which has reasserted itself  
5 repeatedly since the financial crisis began, suggests that  
6 investment decisions are still being driven more by  
7 government support and liquidity concerns than market  
8 fundamentals.<sup>26</sup>

9 In response to renewed capital market uncertainties initiated by unrest in the  
10 Middle East, the natural disaster in Japan, ongoing concerns over the European  
11 sovereign debt crisis, and questions over the sustainability of economic growth,  
12 investors have repeatedly fled to the safety of U.S. Treasury bonds, and stock prices  
13 have experienced renewed volatility.<sup>27</sup> The dramatic rise in the price of gold and  
14 other commodities also attests to investors' heightened concerns over prospective  
15 challenges and risks, including the overhanging threat of inflation and renewed  
16 economic turmoil. With respect to utilities, Fitch observed that, "the outlook for the  
17 sector would be adversely affected by significantly higher inflation and interest  
18 rates."<sup>28</sup> Moody's recently concluded:

19 Over the past few months, we have been reminded that  
20 global financial markets, which are still receiving  
21 extraordinary intervention benefits by sovereign  
22 governments, are exposed to turmoil. Access to the  
23 capital markets could therefore become intermittent, even  
24 for safer, more defensive sectors like the power industry.<sup>29</sup>

25 <sup>26</sup> Gongloff, Mark, "Stock Rebound Is a Crisis Flashback – Late Surge Recalls Market's Volatility  
26 at Peak of Credit Difficulties; Unusual Correlations," *Wall Street Journal* at B1 (Feb. 6, 2010).

27 <sup>27</sup> The Wall Street Journal recently reported that the Dow Jones Industrial Average experienced  
its largest drop since August 2010, which marked the fourth triple-digit move in less than two weeks.  
Tom Lauricella and Jonathan Cheng, "Dow Below 12000 on Mideast Worries – Troubles in Europe  
and China Add to Jitters," *Wall Street Journal* C1 (March. 11, 2011).

28 <sup>28</sup> Fitch Ratings Ltd., "2011 Outlook: U.S. Utilities, Power, and Gas," *Global Power North America  
Special Report* (Dec. 20, 2010).

29 <sup>29</sup> Moody's Investors Service, "Regulation Provides Stability as Risks Mount," *Industry Outlook*  
(Jan. 19, 2011).



1 current cost of capital estimates are likely to understate investors' requirements at  
2 the time the outcome of this proceeding becomes effective and beyond.

3 **Q. What do these events imply with respect to the ROE for Idaho Power?**

4 A. No one knows the future of our complex global economy. We know that the financial  
5 crisis had been building for a long time, and few predicted that the economy would  
6 fall as rapidly as it did, or that corporate bond yields would fluctuate as dramatically  
7 as they have. While conditions in the economy and capital markets appear to have  
8 stabilized significantly since 2009, investors continue to react swiftly and negatively  
9 to any future signs of trouble in the financial system or economy. The fact remains  
10 that the electric utility industry requires significant new capital investment. Given the  
11 importance of reliable utility service, it would be unwise to ignore investors' increased  
12 sensitivity to risk and future capital market trends in evaluating a fair ROE in this  
13 case. Similarly, the Company's capital structure must also preserve the financial  
14 flexibility necessary to maintain access to capital even during times of unfavorable  
15 market conditions.

16 **III. CAPITAL MARKET ESTIMATES**

17 **Q. What is the purpose of this section?**

18 A. This section presents capital market estimates of the cost of equity. First, I examine  
19 the concept of the cost of equity, along with the risk-return tradeoff principle  
20 fundamental to capital markets. Next, I describe DCF, CAPM, and risk premium  
21 analyses conducted to estimate the cost of equity for benchmark groups of  
22 comparable risk firms and evaluate comparable earned rates of return expected for  
23 utilities. Finally, I examine other factors (e.g., flotation costs) that are properly  
24 considered in evaluating a fair ROE.

25 **A. Overview.**

26 **Q. What role does the return on common equity play in a utility's rates?**



1 A. The return on common equity is the cost of attracting and retaining investment in the  
2 utility's physical plant and assets. This investment is necessary to finance the asset  
3 base needed to provide utility service. Competition for investor funds is intense and  
4 investors are free to invest their funds wherever they choose. Investors will commit  
5 money to a particular investment only if they expect it to produce a return  
6 commensurate with those from other investments with comparable risks.

7 **Q. What fundamental economic principle underlies any evaluation of investors'**  
8 **required return on equity?**

9 A. The fundamental economic principle underlying the cost of equity concept is the  
10 notion that investors are risk-averse. In capital markets where relatively risk-free  
11 assets are available (e.g., U.S. Treasury securities), investors can be induced to hold  
12 riskier assets only if they are offered a premium, or additional return, above the rate  
13 of return on a risk-free asset. Because all assets compete with each other for  
14 investor funds, riskier assets must yield a higher expected rate of return than safer  
15 assets to induce investors to invest and hold them.

16 Given this risk-return tradeoff, the required rate of return (k) from an asset (i)  
17 can be generally expressed as:

18 
$$k_i = R_f + RP_i$$

19 where:  $R_f$  = Risk-free rate of return; and

20  $RP_i$  = Risk premium required to hold risky asset i.

21 Thus, the required rate of return for a particular asset at any point in time is a  
22 function of: (1) the yield on risk-free assets and (2) its relative risk, with investors  
23 demanding correspondingly larger risk premiums for assets bearing greater risk.

24 **Q. Is there evidence that the risk-return tradeoff principle actually operates in the**  
25 **capital markets?**

26

1 A. Yes. The risk-return tradeoff can be readily documented in segments of the capital  
2 markets where required rates of return can be directly inferred from market data and  
3 where generally accepted measures of risk exist. Bond yields, for example, reflect  
4 investors' expected rates of return, and bond ratings measure the risk of individual  
5 bond issues. Comparing the observed yields on government securities, which are  
6 considered free of default risk, to the yields on bonds of various rating categories  
7 demonstrates that the risk-return tradeoff does, in fact, exist.

8 **Q. Does the risk-return tradeoff observed with fixed income securities extend to**  
9 **common stocks and other assets?**

10 A. It is generally accepted that the risk-return tradeoff evidenced with long-term debt  
11 extends to all assets. Documenting the risk-return tradeoff for assets other than  
12 fixed income securities, however, is complicated by two factors. First, there is no  
13 standard measure of risk applicable to all assets. Second, for most assets—including  
14 common stock—required rates of return cannot be directly observed. Yet there is  
15 every reason to believe that investors exhibit risk aversion in deciding whether or not  
16 to hold common stocks and other assets, just as when choosing among fixed-income  
17 securities.

18 **Q. Is this risk-return tradeoff limited to differences between firms?**

19 A. No. The risk-return tradeoff principle applies not only to investments in different  
20 firms, but also to different securities issued by the same firm. The securities issued  
21 by a utility vary considerably in risk because they have different characteristics and  
22 priorities. Long-term debt secured by a mortgage on property is senior among all  
23 capital in its claim on a utility's net revenues and is therefore the least risky.  
24 Following bonds are other debt instruments also holding contractual claims on the  
25 utility's net revenues, such as subordinated debentures. The last investors in line  
26 are common shareholders. They receive only the net revenues, if any, remaining

1 after all other claimants have been paid. As a result, the rate of return that investors  
2 require from a utility's common stock, the most junior and riskiest of its securities,  
3 must be considerably higher than the yield offered by the utility's senior, long-term  
4 debt.

5 **Q. What does the above discussion imply with respect to estimating the cost of**  
6 **equity for a utility?**

7 A. Although the cost of equity cannot be observed directly, it is a function of the returns  
8 available from other investment alternatives and the risks to which the equity capital  
9 is exposed. Because it is unobservable, the cost of equity for a particular utility must  
10 be estimated by analyzing information about capital market conditions generally,  
11 assessing the relative risks of the company specifically, and employing various  
12 quantitative methods that focus on investors' required rates of return. These various  
13 quantitative methods typically attempt to infer investors' required rates of return from  
14 stock prices, interest rates, or other capital market data.

15 **Q. Did you rely on a single method to estimate the cost of equity for Idaho**  
16 **Power?**

17 A. No. In my opinion, no single method or model should be relied on by itself to  
18 determine a utility's cost of common equity because no single approach can be  
19 regarded as definitive. Similarly, the OPUC has also considered the results of  
20 alternative methods in establishing allowed ROEs for utilities under its jurisdiction.  
21 Therefore, I applied both the DCF and CAPM methods to estimate the cost of  
22 common equity, and considered the results of the risk premium and comparable  
23 earnings approaches. In my opinion, comparing estimates produced by one method  
24 with those produced by other approaches ensures that the estimates of the cost of  
25 common equity pass fundamental tests of reasonableness and economic logic.

26

1 **B. Comparable Risk Proxy Groups.**

2 **Q. How did you implement these quantitative methods to estimate the cost of**  
3 **common equity for Idaho Power?**

4 A. Application of the DCF model and other quantitative methods to estimate the cost of  
5 equity requires observable capital market data, such as stock prices. Moreover,  
6 even for a firm with publicly traded stock, the cost of equity can only be estimated.  
7 As a result, applying quantitative models using observable market data produces  
8 only an estimate that inherently includes some degree of observation error. Thus,  
9 the accepted approach to increase confidence in the results is to apply the DCF  
10 model and other quantitative methods to a proxy group of publicly traded companies  
11 that investors regard as risk comparable.

12 **Q. What specific proxy group did you rely on for your analysis?**

13 A. In order to reflect the risks and prospects associated with Idaho Power's jurisdictional  
14 utility operations, my DCF analyses focused on a reference group of other utilities  
15 composed of those companies included by Value Line in its Electric Utilities Industry  
16 groups with: (1) S&P corporate credit ratings of "BBB-" to "BBB+"; (2) a Value Line  
17 Safety Rank of "2" or "3"; and (3) a Value Line Financial Strength Rating of "B+" to  
18 "B++."<sup>30</sup> I refer to this group as the "Utility Proxy Group."

19 **Q. What other proxy group did you consider in evaluating a fair ROE for Idaho**  
20 **Power?**

21 A. Under the regulatory standards established by *Hope* and *Bluefield*, the salient  
22 criterion in establishing a meaningful benchmark to evaluate a fair ROE is relative  
23 risk, not the particular business activity or degree of regulation. With regulation  
24

---

25 <sup>30</sup> In addition, I excluded three utilities (FirstEnergy Corp., Northeast Utilities, and Progress  
26 Energy, Inc.) that otherwise would have been in the proxy group, but are not appropriate for  
inclusion because they are currently involved in a major merger or acquisition.

1 taking the place of competitive market forces, required returns for utilities should be  
2 in line with those of non-utility firms of comparable risk operating under the  
3 constraints of free competition. Consistent with this accepted regulatory standard, I  
4 also applied the DCF model to a select group of low-risk risk companies in the non-  
5 utility sectors of the economy. I refer to this group as the "Non-Utility Proxy Group."

6 **Q. What criteria did you apply to develop the Non-Utility Proxy Group?**

7 A. My comparable risk proxy group of non-utility firms was composed of those U.S.  
8 companies followed by Value Line that: (1) pay common dividends; (2) have a  
9 Safety Rank of "1"; (3) have a Financial Strength Rating of "B++" or greater; (4) have  
10 a beta of 0.85 or less; and (5) have investment grade credit ratings from S&P.

11 **Q. Do these criteria provide objective evidence to evaluate investors' risk  
12 perceptions?**

13 A. Yes. Credit ratings are assigned by independent rating agencies for the purpose of  
14 providing investors with a broad assessment of the creditworthiness of a firm.  
15 Ratings generally extend from triple-A (the highest) to D (in default). Other symbols  
16 (e.g., "A+") are used to show relative standing within a category. Because the rating  
17 agencies' evaluation includes virtually all of the factors normally considered  
18 important in assessing a firm's relative credit standing, corporate credit ratings  
19 provide a broad, objective measure of overall investment risk that is readily available  
20 to investors. Although the credit rating agencies are not immune to criticism, their  
21 rankings and analyses are widely cited in the investment community and referenced  
22 by investors.<sup>31</sup> Investment restrictions tied to credit ratings continue to influence  
23

24  
25 <sup>31</sup> While the ratings agencies were faulted during the financial crisis for failing to adequately  
26 assess the risk associated with structured finance products, investors continue to regard corporate  
credit ratings as a reliable guide to investment risks.

1 capital flows, and credit ratings are also frequently used as a primary risk indicator in  
2 establishing proxy groups to estimate the cost of common equity.

3 While credit ratings provide the most widely referenced benchmark for  
4 investment risks, other quality rankings published by investment advisory services  
5 also provide relative assessments of risks that are considered by investors in forming  
6 their expectations for common stocks. Value Line's primary risk indicator is its  
7 Safety Rank, which ranges from "1" (Safest) to "5" (Riskiest). This overall risk  
8 measure is intended to capture the total risk of a stock, and incorporates elements of  
9 stock price stability and financial strength. Given that Value Line is perhaps the most  
10 widely available source of investment advisory information, its Safety Rank provides  
11 useful guidance regarding the risk perceptions of investors.

12 The Financial Strength Rating is designed as a guide to overall financial  
13 strength and creditworthiness, with the key inputs including financial leverage,  
14 business volatility measures, and company size. Value Line's Financial Strength  
15 Ratings range from "A++" (strongest) down to "C" (weakest) in nine steps. Finally,  
16 Value Line's beta measures the volatility of a security's price relative to the market as  
17 a whole. A stock that tends to respond less to market movements has a beta less  
18 than 1.00, while stocks that tend to move more than the market have betas greater  
19 than 1.00.

20 **Q. How do the overall risks of your proxy groups compare with Idaho Power?**

21 A. Table WEA-2 below compares the Utility Proxy Group with the Non-Utility Proxy  
22 Group and Idaho Power across four key indicators of investment risk. Because the  
23 Company does not have publicly traded common stock, the Value Line risk  
24 measures shown reflect those published for the Company's parent, IDACORP.

25  
26

**TABLE WEA-2  
COMPARISON OF RISK INDICATORS**

	<b>S&amp;P</b>	<b>Value Line</b>		
	<b><u>Credit Rating</u></b>	<b><u>Safety Rank</u></b>	<b><u>Financial Strength</u></b>	<b><u>Beta</u></b>
Utility Group	BBB	3	B+	0.76
Non-Utility Group	A	1	A+	0.71
Idaho Power	BBB	3	B+	0.70

**Q. Do these comparisons indicate that investors would view the firms in your proxy groups as risk-comparable to Idaho Power?**

A. Yes. Considered together, a comparison of these objective measures, which consider a broad spectrum of risks, including financial and business position and exposure to firm-specific factors, indicates that investors would likely conclude that the overall investment risks for Idaho Power are generally comparable to those of the firms in the Utility Proxy Group.

With respect to the Non-Utility Proxy Group, its average credit ratings, Safety Rank, and Financial Strength Rating suggest less risk than for Idaho Power, with its 0.71 average beta indicating essentially identical risk. While the impact of differences in regulation is reflected in objective risk measures, my analyses conservatively focus on a lower-risk group of non-utility firms.

**C. Discounted Cash Flow Analyses.**

**Q. What is the economic basis underlying the DCF model?**

A. The DCF model attempts to replicate the market valuation process that sets the price investors are willing to pay for a share of a company's stock. The model rests on the assumption that investors evaluate the risks and expected rates of return from all securities in the capital markets. Given these expectations, the price of each stock is adjusted by the market until investors are adequately compensated for the risks they bear. Therefore, we can look to the market to determine what investors believe a

1 share of common stock is worth. By estimating the cash flows investors expect to  
 2 receive from the stock in the way of future dividends and capital gains, we can  
 3 calculate their required rate of return. In other words, the cash flows that investors  
 4 expect from a stock are estimated, and given its current market price, we can “back-  
 5 into” the discount rate, or cost of equity, that investors implicitly used in bidding the  
 6 stock to that price. Notationally, the general form of the DCF model is as follows:

$$P_0 = \frac{D_1}{(1 + k_e)^1} + \frac{D_2}{(1 + k_e)^2} + \dots + \frac{D_t}{(1 + k_e)^t} + \frac{P_t}{(1 + k_e)^t}$$

7  
 8 where:  $P_0$  = Current price per share;  
 9  $P_t$  = Expected future price per share in period t;  
 10  $D_t$  = Expected dividend per share in period t;  
 $k_e$  = Cost of equity.

11 **Q. What form of the DCF model is customarily used to estimate the cost of equity**  
 12 **in rate cases?**

13 A. Rather than developing annual estimates of cash flows into perpetuity, the DCF  
 14 model can be simplified to a “constant growth” form as shown below:<sup>32</sup>

$$P_0 = \frac{D_1}{k_e - g}$$

15 where:  $P_0$  = Current price per share;  
 16  $D_1$  = Expected dividend per share in coming year;  
 17  $k_e$  = Cost of equity;  
 $g$  = Investors’ long-term growth expectations.

18 The cost of equity ( $K_e$ ) can be isolated by rearranging terms:

$$k_e = \frac{D_1}{P_0} + g$$

19  
 20 This constant growth form of the DCF model recognizes that the rate of return  
 21 to stockholders consists of two parts: (1) dividend yield ( $D_1/P_0$ ) and (2) growth “g.”

22  
 23 <sup>32</sup> The constant growth DCF model is dependent on a number of strict assumptions, which in  
 24 practice are never strictly met. These include a constant growth rate for both dividends and  
 25 earnings, a stable dividend payout ratio, the discount rate exceeds the growth rate, a constant  
 26 growth rate for book value and price, a constant earned rate of return on book value, no sales of  
 stock at a price above or below book value, a constant price-earnings ratio, a constant discount rate  
 (i.e., no changes in risk or interest rate levels and a flat yield curve), and all of the above extend to  
 infinity.



1 In other words, investors expect to receive a portion of their total return in the form of  
2 current dividends and the remainder through price appreciation.

3 **Q. What form of the DCF model did you use?**

4 A. I applied the constant growth DCF model to estimate the cost of equity for Idaho  
5 Power, which is the form of the model most commonly relied on to establish the cost  
6 of equity for traditional regulated utilities and the method most often referenced by  
7 regulators.

8 **Q. How is the constant growth form of the DCF model typically used to estimate  
9 the cost of equity?**

10 A. The first step in implementing the constant growth DCF model is to determine the  
11 expected dividend yield ( $D_1/P_0$ ) for the firm in question. This is usually calculated  
12 based on an estimate of dividends to be paid in the coming year divided by the  
13 current price of the stock. The second, and more controversial, step is to estimate  
14 investors' long-term growth expectations "g" for the firm. The final step is to sum the  
15 firm's dividend yield and estimated growth rate to arrive at an estimate of its cost of  
16 equity.

17 **Q. How was the dividend yield for the Utility Proxy Group determined?**

18 A. Estimates of dividends to be paid by each of these utilities over the next twelve  
19 months, obtained from Value Line, served as  $D_1$ . This annual dividend was then  
20 divided by the corresponding stock price for each utility to arrive at the expected  
21 dividend yield. The expected dividends, stock prices, and resulting dividend yields  
22 for the firms in the Utility Proxy Group are presented on Exhibit 402. As shown  
23 there, dividend yields for the firms in the Utility Proxy Group ranged from 2.0 percent  
24 to 5.9 percent.

25 **Q. What is the next step in applying the constant growth DCF model?**

26

1 A. The next step is to evaluate long-term growth expectations, or “g,” for the firm in  
2 question. In constant growth DCF theory, earnings, dividends, book value, and  
3 market price are all assumed to grow in lockstep, and the growth horizon of the DCF  
4 model is infinite. But implementation of the DCF model is more than just a  
5 theoretical exercise; it is an attempt to replicate the mechanism investors used to  
6 arrive at observable stock prices. A wide variety of techniques can be used to derive  
7 growth rates, but the only “g” that matters in applying the DCF model is the value that  
8 investors expect.

9 **Q. Are historical growth rates likely to be representative of investors’**  
10 **expectations for utilities?**

11 A. No. Past trends in earnings, dividends, and book value are representative of  
12 investors’ expectations for the future only to the extent that the historical conditions  
13 giving rise to these growth rates are expected to continue. That is clearly not the  
14 case for electric utilities, where structural and industry changes have led to declining  
15 growth in dividends, earnings pressure, and, in many cases, significant write-offs.  
16 While these conditions serve to depress historical growth measures, they are not  
17 representative of long-term growth for the electric utility industry or the expectations  
18 that investors have incorporated into current market prices. As a result, historical  
19 growth measures for utilities do not currently meet the requirements of the DCF  
20 model.

21 **Q. What are investors most likely to consider in developing their long-term**  
22 **growth expectations?**

23 A. While the DCF model is technically concerned with growth in dividend cash flows,  
24 implementation of this DCF model is solely concerned with replicating the forward-  
25 looking evaluation of real-world investors. In the case of electric utilities, dividend  
26 growth rates are not likely to provide a meaningful guide to investors’ current growth

1 expectations. This is because utilities have significantly altered their dividend  
2 policies in response to more accentuated business risks in the industry.<sup>33</sup> As a result  
3 of this trend towards a more conservative payout ratio, dividend growth in the utility  
4 industry has remained largely stagnant as utilities conserve financial resources to  
5 provide a hedge against heightened uncertainties.

6 As payout ratios for firms in the electric utility industry have trended  
7 downward, investors' focus has increasingly shifted from dividends to earnings as a  
8 measure of long-term growth. Future trends in earnings, which provide the source  
9 for future dividends and ultimately support share prices, play a pivotal role in  
10 determining investors' long-term growth expectations. The importance of earnings in  
11 evaluating investors' expectations and requirements is well accepted in the  
12 investment community. As noted in *Finding Reality in Reported Earnings* published  
13 by the Association for Investment Management and Research:

14 [E]arnings, presumably, are the basis for the investment  
15 benefits that we all seek. 'Healthy earnings equal healthy  
16 investment benefits' seems a logical equation, but  
17 earnings are also a scorecard by which we compare  
companies, a filter through which we assess management,  
and a crystal ball in which we try to foretell future  
performance.<sup>34</sup>

18 Value Line's near-term projections and its Timeliness Rank,<sup>35</sup> which is the  
19 principal investment rating assigned to each individual stock, are also based  
20 primarily on various quantitative analyses of earnings. As Value Line explained:

21  
22 <sup>33</sup> For example, the payout ratio for electric utilities fell from approximately 80 percent historically  
23 to on the order of 60 percent. The Value Line Investment Survey (Sep. 15, 1995 at 161, Feb. 4,  
2011 at 2237).

24 <sup>34</sup> Association for Investment Management and Research, "Finding Reality in Reported Earnings:  
An Overview," p. 1 (Dec. 4, 1996).

25 <sup>35</sup> The Timeliness Rank presents Value Line's assessment of relative price performance during  
26 the next six to 12 months based on a five point scale.

1                   The future earnings rank accounts for 65% in the  
2                   determination of relative price change in the future; the  
3                   other two variables (current earnings rank and current  
4                   price rank) explain 35%.<sup>36</sup>

5                   The fact that investment advisory services focus on growth in earnings  
6                   indicates that the investment community regards this as a superior indicator of future  
7                   long-term growth. Indeed, "A Study of Financial Analysts: Practice and Theory,"  
8                   published in the *Financial Analysts Journal*, reported the results of a survey  
9                   conducted to determine what analytical techniques investment analysts actually  
10                  use.<sup>37</sup> Respondents were asked to rank the relative importance of earnings,  
11                  dividends, cash flow, and book value in analyzing securities. Of the 297 analysts  
12                  that responded, only three ranked dividends first while 276 ranked it last. The article  
13                  concluded that "Earnings and cash flow are considered far more important than book  
14                  value and dividends."<sup>38</sup>

15                  More recently, the *Financial Analysts Journal* reported the results of a study  
16                  of the relationship between valuations based on alternative multiples and actual  
17                  market prices, which concluded, "In all cases studied, earnings dominated operating  
18                  cash flows and dividends."<sup>39</sup>

19 **Q. Do the growth rate projections of security analysts consider historical trends?**

20 **A.** Yes. Professional security analysts study historical trends extensively in developing  
21 their projections of future earnings. Hence, to the extent there is any useful

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22 <sup>36</sup> The Value Line Investment Survey, *Subscriber's Guide*, p. 53.

23 <sup>37</sup> Block, Stanley B., "A Study of Financial Analysts: Practice and Theory," *Financial Analysts*  
24 *Journal* (July/August 1999).

25 <sup>38</sup> *Id.* at 88.

26 <sup>39</sup> Liu, Jing, Nissim, Doron, & Thomas, Jacob, "Is Cash Flow King in Valuations?," *Financial*  
*Analysts Journal*, Vol. 63, No. 2 (March/April 2007) at 56.

1 information in historical patterns, that information is incorporated into analysts'  
2 growth forecasts.

3 **Q. What are security analysts currently projecting in the way of growth for the**  
4 **firms in the Utility Proxy Group?**

5 A. The earnings growth projections for each of the firms in the Utility Proxy Group  
6 reported by Value Line, Thomson Reuters ("IBES"), and Zacks Investment Research  
7 ("Zacks") are displayed on Exhibit 402.<sup>40</sup>

8 **Q. Some argue that analysts' assessments of growth rates are biased. Do you**  
9 **believe these projections are inappropriate for estimating investors' required**  
10 **return using the DCF model?**

11 A. No. In applying the DCF model to estimate the cost of common equity, the only  
12 relevant growth rate is the forward-looking expectations of investors that are  
13 captured in current stock prices. Investors, just like securities analysts and others in  
14 the investment community, do not know how the future will actually turn out. They  
15 can only make investment decisions based on their best estimate of what the future  
16 holds in the way of long-term growth for a particular stock, and securities prices are  
17 constantly adjusting to reflect their assessment of available information.

18 Any claims that analysts' estimates are not relied upon by investors are  
19 illogical given the reality of a competitive market for investment advice. If financial  
20 analysts' forecasts do not add value to investors' decision making, then it is irrational  
21 for investors to pay for these estimates. Similarly, those financial analysts who fail to  
22 provide reliable forecasts will lose out in competitive markets relative to those  
23 analysts whose forecasts investors find more credible. The reality that analyst  
24 estimates are routinely referenced in the financial media and in investment advisory

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25 <sup>40</sup> Formerly I/B/E/S International, Inc., IBES growth rates are now compiled and published by  
26 Thomson Reuters.

1 publications (e.g., Value Line) implies that investors use them as a basis for their  
2 expectations.

3 The continued success of investment services such as Thompson Reuters  
4 and Value Line, and the fact that projected growth rates from such sources are  
5 widely referenced, provides strong evidence that investors give considerable weight  
6 to analysts' earnings projections in forming their expectations for future growth.  
7 While the projections of securities analysts may be proven optimistic or pessimistic in  
8 hindsight, this is irrelevant in assessing the expected growth that investors have  
9 incorporated into current stock prices, and any bias in analysts' forecasts—whether  
10 pessimistic or optimistic—is similarly irrelevant if investors share the analysts' views.  
11 Earnings growth projections of security analysts provide the most frequently  
12 referenced guide to investors' views and are widely accepted in applying the DCF  
13 model. As explained in *New Regulatory Finance*:

14 Because of the dominance of institutional investors and their  
15 influence on individual investors, analysts' forecasts of long-run  
16 growth rates provide a sound basis for estimating required returns.  
17 Financial analysts exert a strong influence on the expectations of  
18 many investors who do not possess the resources to make their  
own forecasts, that is, they are a cause of  $g$  [growth]. The  
accuracy of these forecasts in the sense of whether they turn out  
to be correct is not an issue here, as long as they reflect widely  
held expectations.<sup>41</sup>

19 **Q. How else are investors' expectations of future long-term growth prospects**  
20 **often estimated for use in the constant growth DCF model?**

21 A. In constant growth theory, growth in book equity will be equal to the product of the  
22 earnings retention ratio (one minus the dividend payout ratio) and the earned rate of  
23 return on book equity. Furthermore, if the earned rate of return and the payout ratio  
24 are constant over time, growth in earnings and dividends will be equal to growth in

25 \_\_\_\_\_  
26 <sup>41</sup> Morin, Roger A., "New Regulatory Finance," *Public Utilities Reports, Inc.*, at 298 (2006).

1 book value. Despite the fact that these conditions are seldom, if ever, met in the real  
2 world, this “sustainable growth” approach may provide a rough guide for evaluating a  
3 firm’s growth prospects and is frequently proposed in regulatory proceedings.

4 Accordingly, while I believe that analysts’ forecasts provide a superior and  
5 more direct guide to investors’ growth expectations, I have included the “sustainable  
6 growth” approach for completeness. The sustainable growth rate is calculated by the  
7 formula,  $g = br + sv$ , where “b” is the expected retention ratio, “r” is the expected  
8 earned return on equity, “s” is the percent of common equity expected to be issued  
9 annually as new common stock, and “v” is the equity accretion rate.

10 **Q. What is the purpose of the “sv” term?**

11 A. Under DCF theory, the “sv” factor is a component of the growth rate designed to  
12 capture the impact of issuing new common stock at a price above, or below, book  
13 value. When a company’s stock price is greater than its book value per share, the  
14 per-share contribution in excess of book value associated with new stock issues will  
15 accrue to the current shareholders. This increase to the book value of existing  
16 shareholders leads to higher expected earnings and dividends, with the “sv” factor  
17 incorporating this additional growth component.

18 **Q. What growth rate does the earnings retention method suggest for the Utility  
19 Proxy Group?**

20 A. The sustainable, “br+sv” growth rates for each firm in the Utility Proxy Group are  
21 summarized on Exhibit 402, with the underlying details being presented on Exhibit  
22 403. For each firm, the expected retention ratio “b” was calculated based on Value  
23 Line’s projected dividends and earnings per share. Likewise, each firm’s expected  
24 earned rate of return “r” was computed by dividing projected earnings per share by  
25 projected net book value. Because Value Line reports end-of-year book values, an  
26 adjustment was incorporated to compute an average rate of return over the year,

1 consistent with the theory underlying this approach to estimating investors' growth  
2 expectations. Meanwhile, the percent of common equity expected to be issued  
3 annually as new common stock "s" was equal to the product of the projected market-  
4 to-book ratio and growth in common shares outstanding, while the equity accretion  
5 rate "v" was computed as 1 minus the inverse of the projected market-to-book ratio.

6 **Q. What cost of equity estimates were implied for the Utility Proxy Group using**  
7 **the DCF model?**

8 A. After combining the dividend yields and respective growth projections for each utility,  
9 the resulting cost of equity estimates are shown on Exhibit 402.

10 **Q. In evaluating the results of the constant growth DCF model, is it appropriate to**  
11 **eliminate cost of equity estimates that are extreme low or high outliers?**

12 A. Yes. In applying quantitative methods to estimate the cost of equity, it is essential  
13 that the resulting values pass fundamental tests of reasonableness and economic  
14 logic. Accordingly, DCF estimates that are implausibly low or high should be  
15 eliminated when evaluating the results of this method.

16 **Q. How did you evaluate DCF estimates at the low end of the range?**

17 A. It is a basic economic principle that investors can be induced to hold more risky  
18 assets only if they expect to earn a return to compensate them for their risk bearing.  
19 As a result, the rate of return that investors require from a utility's common stock, the  
20 most junior and riskiest of its securities, must be considerably higher than the yield  
21 offered by senior, long-term debt. Consistent with this principle, the DCF results  
22 must be adjusted to eliminate estimates that are determined to be extreme low  
23 outliers when compared against the yields available to investors from less risky utility  
24 bonds.

25 **Q. What does this test of logic imply with respect to the DCF results for the Utility**  
26 **Proxy Group?**



1 A. As noted earlier, the average S&P corporate credit rating for the Utility proxy Group  
2 is “BBB,” the same as for Idaho Power. Companies rated “BBB-,” “BBB,” and  
3 “BBB+” are all considered part of the triple-B rating category, with Moody’s monthly  
4 yields on triple-B bonds averaging approximately 6.0 percent in April 2011.<sup>42</sup> It is  
5 inconceivable that investors are not requiring a substantially higher rate of return for  
6 holding common stock. Consistent with this principle, the DCF results for the Utility  
7 Proxy Group must be adjusted to eliminate estimates that are determined to be  
8 extreme low outliers when compared against the yields available to investors from  
9 less risky utility bonds.

10 **Q. Have similar tests been applied by regulators?**

11 A. Yes. FERC has noted that adjustments are justified where applications of the DCF  
12 approach produce illogical results. FERC evaluates DCF results against observable  
13 yields on long-term public utility debt and has recognized that it is appropriate to  
14 eliminate estimates that do not sufficiently exceed this threshold. In a 2002 opinion  
15 establishing its current precedent for determining ROEs for electric utilities, for  
16 example, FERC noted:

17 An adjustment to this data is appropriate in the case of  
18 PG&E’s low-end return of 8.42 percent, which is  
19 comparable to the average Moody’s ‘A’ grade public utility  
20 bond yield of 8.06 percent, for October 1999. Because  
21 investors cannot be expected to purchase stock if debt,  
which has less risk than stock, yields essentially the same  
return, this low-end return cannot be considered reliable in  
this case.<sup>43</sup>

22 Similarly, in its August 2006 decision in *Kern River Gas Transmission*  
23 *Company*, FERC noted that:

24  
25 <sup>42</sup> Moody’s Investors Service, [www.credittrends.com](http://www.credittrends.com).

26 <sup>43</sup> *Southern California Edison Company*, 92 FERC ¶ 61,070 at p. 22 (2000).

1 [T]he 7.31 and 7.32 percent costs of equity for El Paso and  
2 Williams found by the ALJ are only 110 and 122 basis  
points above that average yield for public utility debt.<sup>44</sup>

3 The Commission upheld the opinion of Staff and the Administrative Law Judge that  
4 cost of equity estimates for these two proxy group companies “were too low to be  
5 credible.”<sup>45</sup>

6 The practice of eliminating low-end outliers has been affirmed in numerous  
7 FERC proceedings,<sup>46</sup> and in its April 15, 2010, decision in *SoCal Edison*, FERC  
8 affirmed that “it is reasonable to exclude any company whose low-end ROE fails to  
9 exceed the average bond yield by about 100 basis points or more.”<sup>47</sup>

10 **Q. What else should be considered in evaluating DCF estimates at the low end of**  
11 **the range?**

12 A. As indicated earlier, while corporate bond yields have declined substantially as the  
13 worst of the financial crisis has abated, it is generally expected that long-term interest  
14 rates will rise as the recession ends and the economy returns to a more normal  
15 pattern of growth. As shown in Table WEA-3 below, forecasts of IHS Global Insight  
16 and the EIA imply an average triple-B bond yield of 7.15 percent over the period  
17 2012-2015.

22 <sup>44</sup> *Kern River Gas Transmission Company*, Opinion No. 486, 117 FERC ¶ 61,077 at P 140 & n.  
23 227 (2006).

24 <sup>45</sup> *Id.*

25 <sup>46</sup> See, e.g., *Virginia Electric Power Co.*, 123 FERC ¶ 61,098 at P 64 (2008).

26 <sup>47</sup> *Southern California Edison Co.*, 131 FERC ¶ 61,020 at P 55 (2010) (“*SoCal Edison*”).

**TABLE WEA-3  
IMPLIED BBB BOND YIELD**

	<u>2012-15</u>
Projected AA Utility Yield	
IHS Global Insight (a)	6.33%
EIA (b)	<u>6.58%</u>
Average	6.45%
Current BBB - AA Yield Spread (c)	<u>0.70%</u>
<b>Implied Triple-B Utility Yield</b>	<b>7.15%</b>

(a) IHS Global Insight, *U.S. Economic Outlook* at 19 (Feb. 2011).

(b) Energy Information Administration, *Annual Energy Outlook 2011 Early Release* (Dec. 16, 2010).

(c) Based on monthly average bond yields for the six-month period Nov. 2010 - Apr. 2011.

The increase in debt yields anticipated by IHS Global Insight and EIA is also supported by the widely-referenced Blue Chip, which projects that yields on corporate bonds will climb more than 100 basis points through the period 2012-2016.<sup>48</sup>

**Q. What does this test of logic imply with respect to the DCF results for the Utility Proxy Group?**

A. As shown on Exhibit 402, eight low-end DCF estimates ranged from 2.4 percent to 7.0 percent. Three of these values were below current utility bond yields, with cost of equity estimates of 7.0 percent or below being less than the yield on triple-B utility bonds expected during the period 2012-2015. In light of the risk-return tradeoff principle and the test applied in *SoCal Edison*, it is inconceivable that investors are not requiring a substantially higher rate of return for holding common stock, which is the riskiest of a utility's securities. As a result, consistent with the test of economic logic applied by FERC and the upward trend expected for utility bond yields, these

<sup>48</sup> *Blue Chip Financial Forecasts*, Vol. 29, No. 12 (Dec. 1, 2010) & Vol. 30, No. 3 (Mar. 1, 2011).

1 values provide little guidance as to the returns investors require from utility common  
2 stocks and should be excluded.

3 **Q. Do you also recommend excluding estimates at the high end of the range of**  
4 **DCF results?**

5 A. Yes. The upper end of the cost of common equity range produced by the DCF  
6 analysis presented in Exhibit 402 was set by five cost of equity estimates ranging  
7 from 17.0 percent to 23.3 percent. When compared with the balance of the  
8 remaining estimates, these values are clearly implausible and should be excluded in  
9 evaluating the results of the DCF model for the Utility Proxy Group. This is also  
10 consistent with the precedent adopted by FERC, which has established that  
11 estimates found to be “extreme outliers” should be disregarded in interpreting the  
12 results of the DCF model.<sup>49</sup>

13 **Q. What cost of equity is implied by your DCF results for the Utility Proxy Group?**

14 A. As shown on Exhibit 402 and summarized in Table WEA-4 below, after eliminating  
15 illogical low- and high-end values, application of the constant growth DCF model  
16 resulted in the following cost of equity estimates.

17 **TABLE WEA-4**  
18 **DCF RESULTS – UTILITY PROXY GROUP**

<u>Growth Rate</u>	<u>Average Cost of Equity</u>
Value Line	11.4%
IBES	10.5%
Zacks	10.4%
br+sv	9.1%

22 **Q. What were the results of your DCF analysis for the Non-Utility Proxy Group?**

23 A. I applied the DCF model to the Non-Utility Proxy Group in exactly the same manner  
24 described earlier for the Utility Proxy Group. The results of my DCF analysis for the  
25

26 <sup>49</sup> See, e.g., *ISO New England, Inc.*, 109 FERC ¶ 61,147 at P 205 (2004).

1 Non-Utility Proxy Group are presented in Exhibit 404, with the sustainable, “br+sv”  
2 growth rates being developed on Exhibit 405. As shown on Exhibit 404 and  
3 summarized in Table WEA-5 below, after eliminating illogical low- and high-end  
4 values, application of the constant growth DCF model resulted in cost of common  
5 equity estimates on the order of at least 12 percent.

6 **TABLE WEA-5**  
7 **DCF RESULTS – NON-UTILITY PROXY GROUP**

8 <u>Growth Rate</u>	9 <u>Average Cost of Equity</u>
10 Value Line	11.9%
11 IBES	12.4%
12 Zacks	12.5%
13 br+sv	12.1%

14 As discussed earlier, reference to the Non-Utility Proxy Group is consistent  
15 with established regulatory principles and required returns for utilities should be in  
16 line with those of non-utility firms of comparable risk operating under the constraints  
17 of free competition.

18 **D. Capital Asset Pricing Model.**

19 **Q. Please describe the CAPM.**

20 A. The CAPM is generally considered to be the most widely referenced method for  
21 estimating the cost of equity both among academicians and professional  
22 practitioners, with the pioneering researchers of this method receiving the Nobel  
23 Prize in 1990. The CAPM is a theory of market equilibrium that measures risk using  
24 the beta coefficient. Assuming investors are fully diversified, the relevant risk of an  
25 individual asset (e.g., common stock) is its volatility relative to the market as a whole,  
26 with beta reflecting the tendency of a stock’s price to follow changes in the market.  
The CAPM is mathematically expressed as:

1 
$$R_j = R_f + \beta_j(R_m - R_f)$$

2 where:  $R_j$  = required rate of return for stock j;  
3  $R_f$  = risk-free rate;  
4  $R_m$  = expected return on the market portfolio; and  
5  $B_j$  = beta, or systematic risk, for stock j.

6 Like the DCF model, the CAPM is an *ex-ante*, or forward-looking model  
7 based on expectations of the future. As a result, in order to produce a meaningful  
8 estimate of investors' required rate of return, the CAPM must be applied using  
9 estimates that reflect the expectations of actual investors in the market, not with  
10 backward-looking historical data.

11 **Q. How did you apply the CAPM to estimate the cost of equity?**

12 A. Application of the CAPM to the Utility Proxy Group based on a forward-looking  
13 estimate for investors' required rate of return from common stocks is presented on  
14 page 1 of Exhibit 406. In order to capture the expectations of today's investors in  
15 current capital markets, the expected market rate of return was estimated by  
16 conducting a DCF analysis on the dividend paying firms in the S&P 500 Composite  
17 Index.

18 The dividend yield for each firm was calculated based on the annual indicated  
19 dividend payment obtained from Value Line, increased by one-years' growth using  
20 the rate discussed subsequently  $(1 + g)$  to convert them to year-ahead dividend  
21 yields presumed by the constant growth DCF model. The growth rate was equal to  
22 the consensus earnings growth projections for each firm published by IBES, with  
23 each firm's dividend yield and growth rate being weighted by its proportionate share  
24 of total market value. Based on the weighted average of the projections for the 354  
25 individual firms, current estimates imply an average growth rate over the next five  
26 years of 10.5 percent. Combining this average growth rate with a year-ahead  
dividend yield of 2.3 percent results in a current cost of common equity estimate for

1 the market as a whole ( $R_m$ ) of approximately 12.8 percent. Subtracting a 4.5 percent  
2 risk-free rate based on the average yield on 30-year Treasury bonds produced a  
3 market equity risk premium of 8.3 percent.

4 **Q. What was the source of the beta values you used to apply the CAPM?**

5 A. I relied on the beta values reported by Value Line, which in my experience is the  
6 most widely referenced source for beta in regulatory proceedings. As noted in *New*  
7 *Regulatory Finance*:

8 Value Line is the largest and most widely circulated  
9 independent investment advisory service, and influences  
10 the expectations of a large number of institutional and  
11 individual investors . . . . Value Line betas are computed  
on a theoretically sound basis using a broadly based  
market index, and they are adjusted for the regression  
tendency of betas to converge to 1.00.<sup>50</sup>

12 **Q. What else should be considered in applying the CAPM?**

13 A. As explained by *Morningstar*:

14 One of the most remarkable discoveries of modern finance  
15 is that of a relationship between firm size and return. The  
16 relationship cuts across the entire size spectrum but is  
most evident among smaller companies, which have  
higher returns on average than larger ones.<sup>51</sup>

17 Because empirical research indicates that the CAPM does not fully account  
18 for observed differences in rates of return attributable to firm size, a modification is  
19 required to account for this size effect.

20 According to the CAPM, the expected return on a security should consist of  
21 the riskless rate, plus a premium to compensate for the systematic risk of the  
22 particular security. The degree of systematic risk is represented by the beta  
23 coefficient. The need for the size adjustment arises because differences in investors'

24  
25 <sup>50</sup> Morin, Roger A., "New Regulatory Finance," *Public Utilities Reports* at 71 (2006).

26 <sup>51</sup> *Morningstar*, "Ibbotson SBBI 2011 Valuation Yearbook," at p. 83 (footnote omitted).

1 required rates of return that are related to firm size are not fully captured by beta. To  
2 account for this, *Morningstar* has developed size premiums that need to be added to  
3 the theoretical CAPM cost of equity estimates to account for the level of a firm's  
4 market capitalization in determining the CAPM cost of equity.<sup>52</sup> Accordingly, my  
5 CAPM analyses incorporated an adjustment to recognize the impact of size  
6 distinctions, as measured by the average market capitalization for the respective  
7 proxy groups.

8 **Q. What cost of equity estimate was indicated for the Utility Proxy Group based**  
9 **on this forward-looking application of the CAPM?**

10 A. The average market capitalization of the Utility Proxy Group is \$5.3 billion. Based on  
11 data from *Morningstar*, this means that the theoretical CAPM cost of equity estimate  
12 must be increased by 101 basis points to account for the industry group's relative  
13 size. As shown on Exhibit 406, adjusting the theoretical CAPM result to incorporate  
14 this size adjustment results in an average indicated cost of common equity of 11.8  
15 percent.

16 **Q. What cost of common equity was indicated for the Non-Utility Proxy Group**  
17 **based on this forward-looking application of the CAPM?**

18 A. As shown on page 2 of Exhibit 406, applying the forward-looking CAPM approach to  
19 the firms in the Non-Utility Proxy Group results in an average implied cost of  
20 common equity of 10.0 percent.

21 **Q. Is it appropriate to consider anticipated capital market changes in applying the**  
22 **CAPM?**

23 A. Yes. As discussed earlier, there is widespread consensus that interest rates will  
24 increase materially as the economy continues to strengthen. As a result, current  
25

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26 <sup>52</sup> *Id.* at Table C-1.



1 bond yields are likely to understate capital market requirements at the time the  
2 outcome of this proceeding becomes effective. Accordingly, in addition to the use of  
3 current bond yields, I also applied the CAPM based on the forecasted long-term  
4 Treasury bond yields developed based on projections published by Value Line, IHS  
5 Global Insight, and Blue Chip.

6 **Q. What cost of equity was produced by the CAPM after incorporating forecasted**  
7 **bond yields?**

8 A. As shown on page 1 of Exhibit 407, incorporating a forecasted yield for 2012-2015  
9 implied a cost of equity of approximately 12.0 percent for the Utility Proxy Group, or  
10 10.2 percent for the group of non-utility firms (page 2 of Exhibit 407).

11 **Q. Should the CAPM approach be applied using historical rates of return?**

12 A. No. The CAPM cost of common equity estimate is calibrated from investors'  
13 required risk premium between Treasury bonds and common stocks. In response to  
14 heightened uncertainties, investors have repeatedly sought a safe haven in U.S.  
15 government bonds and this "flight to safety" has pushed Treasury yields significantly  
16 lower while yield spreads for corporate debt have widened. This distortion not only  
17 impacts the absolute level of the CAPM cost of equity estimate, but it affects  
18 estimated risk premiums. Economic logic would suggest that investors' required risk  
19 premium for common stocks over Treasury bonds has also increased.

20 Meanwhile, backward-looking approaches incorrectly assume that investors'  
21 assessment of the required risk premium between Treasury bonds and common  
22 stocks is constant, and equal to some historical average. At no time in recent history  
23 has the fallacy of this assumption been demonstrated more concretely than it is  
24 today. This incongruity between investors' current expectations and historical risk

25  
26

1 premiums is particularly relevant during periods of heightened uncertainty and rapidly  
2 changing capital market conditions, such as those experienced recently.<sup>53</sup>

3 **E. Risk Premium Approach.**

4 **Q. Briefly describe the risk premium method.**

5 A. The risk premium method of estimating investors' required rate of return extends to  
6 common stocks the risk-return tradeoff observed with bonds. The cost of equity is  
7 estimated by first determining the additional return investors require to forgo the  
8 relative safety of bonds and to bear the greater risks associated with common stock,  
9 and by then adding this equity risk premium to the current yield on bonds. Like the  
10 DCF model, the risk premium method is capital market oriented. However, unlike  
11 DCF models, which indirectly impute the cost of equity, risk premium methods  
12 directly estimate investors' required rate of return by adding an equity risk premium  
13 to observable bond yields.

14 **Q. How did you implement the risk premium method?**

15 A. I based my estimates of equity risk premiums for electric utilities on surveys of  
16 previously authorized rates of return on common equity. Authorized returns  
17 presumably reflect regulatory commissions' best estimates of the cost of equity,  
18 however determined, at the time they issued their final order. Such returns should  
19 represent a balanced and impartial outcome that considers the need to maintain a  
20 utility's financial integrity and ability to attract capital. Moreover, allowed returns are  
21 an important consideration for investors and have the potential to influence other  
22 observable investment parameters, including credit ratings and borrowing costs.

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24 <sup>53</sup> FERC has previously rejected CAPM methodologies based on historical data because  
25 whatever historical relationships existed between debt and equity securities may no longer hold.  
26 See *Orange & Rockland Utils., Inc.*, 40 F.E.R.C. P63,053, at pp. 65,208 -09 (1987), aff'd, Opinion  
No. 314, 44 F.E.R.C. P61,253 at 65,208.

1 Thus, this data provides a logical and frequently referenced basis for estimating  
2 equity risk premiums for regulated utilities.

3 **Q. How did you implement the risk premium approach using surveys of allowed**  
4 **rates of return?**

5 A. Surveys of previously authorized rates of return on common equity are frequently  
6 referenced as the basis for estimating equity risk premiums. The rates of return on  
7 common equity authorized utilities by regulatory commissions across the U.S. are  
8 compiled by Regulatory Research Associates and published in its *Regulatory Focus*  
9 report. In Exhibit 408, the average yield on public utility bonds is subtracted from the  
10 average allowed rate of return on common equity for electric utilities to calculate  
11 equity risk premiums for each year between 1974 and 2010. Over this 37-year  
12 period, these equity risk premiums for electric utilities averaged 3.36 percent, and the  
13 yield on public utility bonds averaged 9.01 percent.

14 **Q. Are there any capital market relationships that must be considered when**  
15 **implementing the risk premium method?**

16 A. Yes. There is considerable evidence that the magnitude of equity risk premiums is  
17 not constant and that equity risk premiums tend to move inversely with interest rates.  
18 In other words, when interest rate levels are relatively high, equity risk premiums  
19 narrow; conversely, when interest rates are relatively low, equity risk premiums  
20 widen. The implication of this inverse relationship is that the cost of equity does not  
21 move as much as, or in lockstep with, interest rates. Accordingly, for a 1 percent  
22 increase or decrease in interest rates, the cost of equity may only rise or fall, say, 50  
23 basis points. Therefore, when implementing the risk premium method, adjustments  
24 may be required to incorporate this inverse relationship if current interest rate levels  
25 have changed since the equity risk premiums were estimated.

26

1           Finally, it is important to recognize that the historical focus of the risk  
2 premium studies almost certainly ensures that they fail to fully capture the  
3 significantly greater risks that investors now associate with providing electric utility  
4 service. As a result, they are likely to understate the cost of equity for a firm  
5 operating in today's electric power industry.

6 **Q. What cost of equity is implied by surveys of allowed rates of return on equity?**

7 A. Based on the regression output between the interest rates and equity risk premiums  
8 displayed on page 3 of Exhibit 408, the equity risk premium for electric utilities  
9 increased approximately 41 basis points for each percentage point drop in the yield  
10 on average public utility bonds. As illustrated on page 1 of Exhibit 408, with the yield  
11 on average public utility bonds in April 2011 being 5.62 percent, this implied a current  
12 equity risk premium of 4.75 percent for electric utilities. Adding this equity risk  
13 premium to the average yield on triple-B utility bonds of 5.98 percent produces a  
14 current cost of equity of approximately 10.7 percent.

15 **Q. What cost of equity was produced by the risk premium approach after  
16 incorporating forecasted bond yields?**

17 A. As shown on page 2 of Exhibit 408, incorporating a forecasted yield for 2012-2015  
18 and adjusting for changes in interest rates since the study period implied an equity  
19 risk premium of 4.21 percent for electric utilities. Adding this equity risk premium to  
20 the average implied yield on triple-B public utility bonds for 2012-2015 of 7.15  
21 percent resulted in an implied cost of equity of approximately 11.4 percent.

22 **F. Comparable Earnings Approach.**

23 **Q. What other benchmarks did you develop to evaluate the ROE for Idaho Power?**

24 A. As I noted earlier, I also evaluated the ROE by reference to expected rates of return  
25 for electric utilities. Reference to rates of return available from alternative  
26 investments of comparable risk can provide an important benchmark in assessing

1 the return necessary to assure confidence in the financial integrity of a firm and its  
2 ability to attract capital. This approach is consistent with the economic  
3 underpinnings for a fair rate of return, as reflected in the comparable earnings test  
4 established by the Supreme Court in *Hope* and *Bluefield*. Moreover, it avoids the  
5 complexities and limitations of capital market methods and instead focuses on the  
6 returns earned on book equity, which are readily available to investors.

7 **Q. What economic premise underlies the comparable earnings approach?**

8 A. The simple but powerful concept underlying the expected earnings approach is that  
9 investors compare each investment alternative with the next best opportunity. If the  
10 utility is unable to offer a return similar to that available from other opportunities of  
11 comparable risk, investors will become unwilling to supply the capital on reasonable  
12 terms. For existing investors, denying the utility an opportunity to earn what is  
13 available from other similar risk alternatives prevents it from earning its opportunity  
14 cost of capital. In this situation the government is effectively taking the value of  
15 investors' capital without adequate compensation.

16 **Q. How is the comparison of opportunity costs typically implemented?**

17 A. The traditional comparable earnings test identifies a group of companies that are  
18 believed to be comparable in risk to the utility. The actual earnings of those  
19 companies on the book value of their investment are then compared to the allowed  
20 return of the utility. While the traditional comparable earnings test is implemented  
21 using historical data taken from the accounting records, it is also common to use  
22 projections of returns on book investment, such as those published by recognized  
23 investment advisory publications (e.g., Value Line). Because these expected returns  
24 on book value equity are analogous to the allowed return on a utility's rate base, this  
25 measure of opportunity costs results in a direct, "apples to apples" comparison. My  
26

1 application of the expected earnings approach was focused exclusively on forward-  
2 looking projections, not historical data.

3 Moreover, regulators do not set the returns that investors earn in the capital  
4 markets—they can only establish the allowed return on the value of a utility’s  
5 investment, as reflected on its accounting records. As a result, the comparable  
6 earnings approach provides a direct guide to ensure that the allowed ROE is similar  
7 to what other utilities of comparable risk will earn on invested capital. This  
8 opportunity cost test does not require theoretical models to indirectly infer investors’  
9 perceptions from stock prices or other market data. As long as the proxy companies  
10 are similar in risk, their expected earned returns on invested capital provide a direct  
11 benchmark for investors’ opportunity costs that is independent of fluctuating stock  
12 prices, market-to-book ratios, debates over DCF growth rates, or the limitations  
13 inherent in any theoretical model of investor behavior.

14 **Q. What rates of return on equity are indicated for electric utilities based on the**  
15 **comparable earnings approach?**

16 A. Value Line reports that its analysts anticipate an average rate of return on common  
17 equity for the electric utility industry of 10.5 percent over its forecast horizon.<sup>54</sup>  
18 Meanwhile, for the firms in the Utility Proxy Group specifically, the returns on  
19 common equity projected by Value Line over its forecast horizon are shown on  
20 Exhibit 409. Consistent with the rationale underlying the development of the br+sv  
21 growth rates, these year-end values were converted to average returns using the  
22 same adjustment factor discussed earlier and developed on Exhibit 403. As shown  
23 on Exhibit 409, Value Line’s projections for the Utility Proxy Group suggest an  
24 average ROE of 10.4 percent after eliminating outliers.

25

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26 <sup>54</sup> The Value Line Investment Survey at 901 (Mar. 25, 2011).

1       **G.     Flotation Costs.**

2       **Q.     What other considerations are relevant in determining the ROE for Idaho**  
3       **Power?**

4       A.     The common equity used to finance the investment in utility assets is provided from  
5       either the sale of stock in the capital markets or from retained earnings not paid out  
6       as dividends.  When equity is raised through the sale of common stock, there are  
7       costs associated with “floating” the new equity securities.  These flotation costs  
8       include services such as legal, accounting, and printing, as well as the fees and  
9       discounts paid to compensate brokers for selling the stock to the public.  Also, some  
10      argue that the “market pressure” from the additional supply of common stock and  
11      other market factors may further reduce the amount of funds that a utility nets when it  
12      issues common equity.

13      **Q.     Is there an established mechanism for a utility to recognize equity issuance**  
14      **costs?**

15      A.     No.  While debt flotation costs are recorded on the books of the utility, amortized  
16      over the life of the issue, and thus increase the effective cost of debt capital, there is  
17      no similar accounting treatment to ensure that equity flotation costs are recorded and  
18      ultimately recognized.  Similarly, no rate of return is authorized on flotation costs  
19      necessarily incurred to obtain a portion of the equity capital used to finance plant.  In  
20      other words, equity flotation costs are not included in a utility’s rate base because  
21      neither that portion of the gross proceeds from the sale of common stock used to pay  
22      flotation costs is available to invest in plant and equipment, nor are flotation costs  
23      capitalized as an intangible asset.  Unless some provision is made to recognize  
24      these issuance costs, a utility’s revenue requirements will not fully reflect all of the  
25      costs incurred for the use of investors’ funds.  Because there is no accounting  
26      convention to accumulate the flotation costs associated with equity issues, they must

1 be accounted for indirectly, with an upward adjustment to the cost of common equity  
2 being the most logical mechanism.

3 **Q. What is the magnitude of the adjustment to the “bare bones” cost of common**  
4 **equity to account for issuance costs?**

5 A. While there are a number of ways in which a flotation cost adjustment can be  
6 calculated, one of the most common methods used to account for flotation costs in  
7 regulatory proceedings is to apply an average flotation-cost percentage to a utility’s  
8 dividend yield. Based on a review of the finance literature, *New Regulatory Finance*  
9 concluded:

10 The flotation cost allowance requires an estimated  
11 adjustment to the return on equity of approximately 5% to  
12 10%, depending on the size and risk of the issue.<sup>55</sup>

13 Alternatively, a study of data from Morgan Stanley regarding issuance costs  
14 associated with utility common stock issuances suggests an average flotation cost  
15 percentage of 3.6 percent.<sup>56</sup>

16 Issuance costs are a legitimate consideration in setting the ROE for a utility,  
17 and applying these expense percentages to a representative dividend yield for a  
18 utility of 4.5 percent implies a flotation cost adjustment on the order of 15 to 45 basis  
19 points.

20 **IV. RETURN ON EQUITY FOR IDAHO POWER COMPANY**

21 **Q. What is the purpose of this section?**

22

23

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24 <sup>55</sup> Roger A. Morin, “New Regulatory Finance,” *Public Utilities Reports, Inc.* at 323 (2006).

25 <sup>56</sup> Application of Yankee Gas Services Company for a Rate Increase, DPUC Docket No. 04-06-  
26 01, Direct Testimony of George J. Eckenroth (Jul. 2, 2004) at Exhibit GJE-11.1. Updating the results  
presented by Mr. Eckenroth through April 2005 also resulted in an average flotation cost percentage  
of 3.6 percent.



1 A. In addition to presenting the conclusions of my evaluation of a fair rate of return on  
2 equity for Idaho Power, this section also discusses the relationship between ROE  
3 and preservation of a utility's financial integrity and the ability to attract capital. In  
4 addition, I evaluate the reasonableness of Idaho Power's requested capital structure.

5 **A. Implications for Financial Integrity.**

6 **Q. Why is it important to allow Idaho Power an adequate authorized ROE?**

7 A. Given the importance of the utility industry to the economy and society, it is essential  
8 to maintain reliable and economical service to all consumers. While Idaho Power  
9 remains committed to deliver reliable service, a utility's ability to fulfill its mandate  
10 can be compromised if it lacks the necessary financial wherewithal or is unable to  
11 earn a return sufficient to attract capital.

12 As documented earlier, the major rating agencies have warned of exposure  
13 to uncertainties associated with capital expenditure requirements, uncertain  
14 economic and financial market conditions, future environmental compliance costs,  
15 and the potential for continued energy price volatility. As discussed earlier, Idaho  
16 Power faces a number of potential challenges that might require the relatively swift  
17 commitment of significant capital resources in order to maintain the high level of  
18 service to which customers have become accustomed.

19 Investors understand how swiftly unforeseen circumstances can lead to  
20 deterioration in a utility's financial condition, and stakeholders have discovered  
21 firsthand how difficult and complex it can be to remedy the situation after the fact.  
22 While providing the infrastructure necessary to enhance the power system and meet  
23 the energy needs of customers is certainly desirable, it imposes additional financial  
24 responsibilities on Idaho Power. For a utility with an obligation to provide reliable  
25 service, investors' increased reticence to supply additional capital during times of  
26 crisis highlights the necessity of preserving the flexibility necessary to overcome

1 periods of adverse capital market conditions. These considerations heighten the  
2 importance of allowing Idaho Power an adequate return on its investment.

3 **Q. What role does regulation play in ensuring Idaho Power's access to capital?**

4 A. The major rating agencies have warned investors of the exposure to uncertainties  
5 associated with political and regulatory developments. Investors recognize that  
6 constructive regulation is a key ingredient in supporting utility credit ratings and  
7 financial integrity, particularly during times of adverse conditions. Fitch noted that a  
8 weak economic backdrop "could result in political push-back to rate increase  
9 requests."<sup>57</sup> Fitch concluded, "[G]iven the lingering rate of unemployment and voter  
10 concerns about the economy, there could well be pockets of adverse rate decisions,  
11 and those companies with little financial cushion could suffer adverse effects."<sup>58</sup>  
12 S&P has also emphasized the need for regulatory support, concluding "the quality of  
13 regulation is at the forefront of our analysis of utility creditworthiness."<sup>59</sup> Similarly,  
14 Moody's concluded:

15 For the longer term, however, we are becoming  
16 increasingly concerned about possible changes to our  
17 fundamental assumptions about regulatory risk, particularly  
18 the prospect of a more adversarial political (and therefore  
19 regulatory) environment. A prolonged recessionary climate  
20 with high unemployment, or an intense period of inflation,  
21 could make cost recovery more uncertain.<sup>60</sup>

19 Moody's concluded that political risks associated with "growing consumer  
20 intolerance for steadily increasing rates" was a key longer-term challenge for utilities

21 <sup>57</sup> Fitch Ratings Ltd., "U.S. Utilities, Power and Gas 2009 Outlook," *Global Power North America*  
22 *Special Report* (Dec. 22, 2008).

23 <sup>58</sup> Fitch Ratings Ltd., "U.S. Utilities, Power and Gas 2010 Outlook," *Global Power North America*  
24 *Special Report* (Dec. 4, 2009).

25 <sup>59</sup> Standard & Poor's Corporation, "Assessing U.S. Utility Regulatory Environments,"  
26 *RatingsDirect* (Nov. 7, 2008).

27 <sup>60</sup> Moody's Investors Service, "U.S. Regulated Electric Utilities, Six-Month Update," *Industry*  
28 *Outlook* (July 2009).

1 that would be intensified by prolonged unemployment.<sup>61</sup> With respect to Idaho  
2 Power specifically, the major bond rating agencies have noted the importance of  
3 constructive regulatory decisions in mitigating financial pressures, while observing  
4 that waning support would likely lead to a deterioration in the Company's credit  
5 standing.<sup>62</sup>

6 **Q. Do customers benefit by enhancing the utility's financial flexibility?**

7 A. Yes. While providing an ROE that is sufficient to maintain Idaho Power's ability to  
8 attract capital, even in times of financial and market stress, is consistent with the  
9 economic requirements embodied in the Supreme Court's *Hope* and *Bluefield*  
10 decisions, it is also in customers' best interests. Customers and the service area  
11 economy enjoy the benefits that come from ensuring that the utility has the financial  
12 wherewithal to take whatever actions are required to ensure reliable service.

13 **B. Capital Structure.**

14 **Q. Is an evaluation of the capital structure maintained by a utility relevant in  
15 assessing its return on equity?**

16 A. Yes. Other things equal, a higher debt ratio, or lower common equity ratio, translates  
17 into increased financial risk for all investors. A greater amount of debt means more  
18 investors have a senior claim on available cash flow, thereby reducing the certainty  
19 that each will receive his contractual payments. This increases the risks to which  
20 lenders are exposed, and they require correspondingly higher rates of interest. From  
21 common shareholders' standpoints, a higher debt ratio means that there are  
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24 <sup>61</sup> Moody's Investors Service, "U.S. Electric Utilities Face Challenges Beyond Near-Term,"  
*Industry Outlook* (Jan. 2010).

25 <sup>62</sup> See, e.g., Moody's Investors Service, "Credit Opinion: Idaho Power Company," *Global Credit*  
26 *Research* (Mar. 9, 2011).

1 proportionately more investors ahead of them, thereby increasing the uncertainty as  
2 to the amount of cash flow, if any, that will remain.

3 **Q. What common equity ratio is implicit in Idaho Power's requested capital**  
4 **structure?**

5 A. Idaho Power's capital structure is presented in the testimony of Mr. Keen. As  
6 summarized in his testimony, the common equity ratio used to compute Idaho  
7 Power's overall rate of return was approximately 51 percent in this filing.

8 **Q. What was the average capitalization maintained by the Utility Proxy Group?**

9 A. As shown on Exhibit 410, for the firms in the Utility Proxy Group, common equity  
10 ratios at December 31, 2010, ranged from 25.3 percent to 63.8 percent and  
11 averaged 46.4 percent.

12 **Q. What capitalization is representative for the proxy group of utilities going**  
13 **forward?**

14 A. As shown on Exhibit 410, Value Line expects an average common equity ratio for the  
15 proxy group of utilities of 48.9 percent for its three-to-five year forecast horizon, with  
16 the individual common equity ratios ranging from 29.0 percent to 67.5 percent.

17 **Q. What implication do the uncertainties facing the utility industry have for the**  
18 **capital structures maintained by electric utilities?**

19 A. As discussed earlier, utilities are facing energy market volatility, rising cost  
20 structures, the need to finance significant capital investment plans, changing  
21 environmental mandates, uncertainties over accommodating economic and financial  
22 market uncertainties, and ongoing regulatory risks. Taken together, these  
23 considerations warrant a stronger balance sheet to deal with an increasingly  
24 uncertain environment. A more conservative financial profile, in the form of a higher  
25 common equity ratio, is consistent with increasing uncertainties and the need to  
26 maintain the continuous access to capital under reasonable terms that is required to

1 fund operations and necessary system investment, even during times of adverse  
2 capital market conditions.

3 Moody's has repeatedly warned investors of the risks associated with debt  
4 leverage and fixed obligations and advised utilities not to squander the opportunity to  
5 strengthen the balance sheet as a buffer against future uncertainties.<sup>63</sup> More  
6 recently, Moody's concluded:

7 From a credit perspective, we believe a strong balance  
8 sheet coupled with abundant sources of liquidity  
9 represents one of the best defenses against business and  
operating risk and potential negative ratings actions.<sup>64</sup>

10 Similarly, S&P noted that, "we generally consider a debt to capital level of  
11 50% or greater to be aggressive or highly leveraged for utilities."<sup>65</sup> Fitch affirmed that  
12 it expects regulated utilities "to extend their conservative balance sheet stance," and  
13 employ "a judicious mix of debt and equity to finance high levels of planned  
14 investments."<sup>66</sup> This is especially the case for electric utilities that are exposed to  
15 potential significant fluctuations in power supply costs, such as Idaho Power.

16 **Q. What other factors do investors consider in their assessment of a company's**  
17 **capital structure?**

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20 <sup>63</sup> Moody's Investors Service, "Storm Clouds Gathering on the Horizon for the North American  
21 Electric Utility Sector," *Special Comment* (Aug. 2007); "U.S. Electric Utility Sector," *Industry Outlook*  
(Jan. 2008).

22 <sup>64</sup> Moody's Investors Service, "U.S. Electric Utilities Face Challenges Beyond Near-Term,"  
23 *Industry Outlook* (Jan. 2010).

24 <sup>65</sup> Standard & Poor's Corporation, "Ratings Roundup: U.S. Electric Utility Sector Maintained  
Strong Credit Quality in a Gloomy 2009," *RatingsDirect* (Jan. 26, 2010).

25 <sup>66</sup> Fitch Ratings Ltd., "U.S. Utilities, Power, and Gas 2010 Outlook," *Global Power North America*  
26 *Special Report* (Dec. 4, 2009).

1 A. Depending on their specific attributes, contractual agreements or other obligations  
2 that require the utility to make specified payments may be treated as debt in  
3 evaluating Idaho Power's financial risk. PPAs and other contractual commitments  
4 typically obligate the utility to make specified minimum payments akin to those  
5 associated with traditional debt financing, and investors consider a portion of these  
6 obligations as debt in evaluating total financial risks.

7 Similarly, when a utility enters into a mandated PPA with a Qualifying Facility  
8 ("QF") under the Public Utility Regulatory Policies Act of 1978, the fixed charges  
9 associated with the contract increase the utility's financial risk in the same way that  
10 long-term debt and other financial obligations increase financial leverage. As  
11 discussed in the testimony of Mr. Keen, Idaho Power's obligations under PPAs with  
12 QFs have expanded dramatically in recent years. Because investors consider the  
13 debt impact of such fixed obligations in assessing a utility's financial position, they  
14 imply greater risk and reduced financial flexibility.

15 In order to offset the debt equivalent associated with commitments under  
16 PPAs with QF developers and other fixed obligations, Idaho Power must rebalance  
17 its capital structure by increasing its common equity in order to restore its effective  
18 capitalization ratios to previous levels. These commitments have been repeatedly  
19 cited by major bond rating agencies in connection with assessments of utility  
20 financial risks.<sup>67</sup> For example, S&P reported that it adjusts Idaho Power's  
21 capitalization to include approximately \$327 million in imputed debt from PPAs,

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<sup>67</sup> See, e.g., Standard & Poor's Corporation, "Standard & Poor's Methodology For Imputing Debt For U.S. Utilities' Power Purchase Agreements," *RatingsDirect* (May 7, 2007); Standard & Poor's Corporation, "Implications of Operating Leases on Analysis of U.S. Electric Utilities," *RatingsDirect* (Jan. 15, 2008); Standard & Poor's Corporation, "Top 10 Investor Questions: U.S. Regulated Electric Utilities," *RatingsDirect* (Jan. 22, 2010).

1 leases, and postretirement benefit obligations.<sup>68</sup> The capital structure ratios  
2 presented earlier do not include imputed debt associated with power purchase  
3 agreements or the impact of other off-balance sheet obligations. Unless Idaho  
4 Power takes action to offset this additional financial risk by maintaining a higher  
5 equity ratio, the resulting leverage will weaken the Company's creditworthiness,  
6 implying a higher required rate of return to compensate investors for the greater  
7 risks.<sup>69</sup>

8 **Q. What did you conclude with respect to the Company's capital structure?**

9 A. Based on my evaluation, I concluded that Idaho Power's requested capital structure  
10 represents a reasonable mix of capital sources from which to calculate the  
11 Company's overall rate of return. Idaho Power's requested common equity ratio of  
12 approximately 51 percent is consistent with the range of capitalizations implied for  
13 the Utility Proxy Group based on year-end 2010 data and Value Line's near-term  
14 projections.

15 While industry averages provide one benchmark for comparison, each firm  
16 must select its capitalization based on the risks and prospects it faces, as well as its  
17 specific needs to access the capital markets. A public utility with an obligation to  
18 serve must maintain ready access to capital under reasonable terms so that it can  
19 meet the service requirements of its customers. Idaho Power's proposed capital  
20 structure is consistent with industry benchmarks and reflects the Company's ongoing  
21 efforts to maintain its credit standing and support access to capital on reasonable  
22 terms. The reasonableness of the Company's requested capital structure is

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24 <sup>68</sup> Standard & Poor's Corporation, "Idaho Power Co.," *RatingsDirect* (May 14, 2010).

25 <sup>69</sup> Apart from the immediate impact that the fixed obligation of purchased power costs has on the  
26 utility's financial risk, higher fixed charges also reduce ongoing financial flexibility, and the utility may face other uncertainties, such as potential replacement power costs in the event of supply disruption.

1 reinforced by the ongoing uncertainties associated with the utility industry, the  
2 magnitude of the Company's fixed obligations (including QF contracts) and the  
3 importance of supporting continued investment in system improvements, even during  
4 times of adverse industry or market conditions.

5 **C. Return on Equity Recommendation.**

6 **Q. Please summarize the results of your analyses.**

7 A. Reflecting the fact that investors' required ROE is unobservable and no single  
8 method should be viewed in isolation, I used the DCF, CAPM, and risk premium  
9 methods and evaluated comparable earned rates of return expected for utilities. In  
10 order to reflect the risks and prospects associated with Idaho Power's jurisdictional  
11 electric utility operations, my analyses focused on a proxy group of comparable risk  
12 electric utilities. Consistent with the fact that utilities must compete for capital with  
13 firms outside their own industry, I also referenced a proxy group of low-risk  
14 companies in the non-utility sectors of the economy.

15 My application of the constant growth DCF model considered three  
16 alternative growth measures based on projected earnings growth, as well as the  
17 sustainable, "br+sv" growth rate for each firm in the respective proxy groups. In  
18 addition, I evaluated the reasonableness of the resulting DCF estimates and  
19 eliminated low- and high-end outliers that failed to meet threshold tests of economic  
20 logic. My CAPM analyses focused on forward-looking data that best reflects the  
21 underlying assumptions of this approach, and my applications of the risk premium  
22 and comparable earnings methods focused directly on electric utilities. The results  
23 of my alternative analyses are summarized below in Table WEA-6.

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**TABLE WEA-6  
SUMMARY OF QUANTITATIVE RESULTS**

<u>DCF</u>	<u>Utility</u>	<u>Non-Utility</u>
Earnings Growth		
Value Line	11.4%	11.9%
IBES	10.5%	12.4%
Zacks	10.4%	12.5%
br + sv	9.1%	12.1%
<u>CAPM</u>		
Current Bond Yields	11.8%	10.0%
Projected Bond Yields	12.0%	10.2%
<u>Electric Utility Risk Premium</u>		
Current Bond Yields	10.7%	
Projected Bond Yields	11.3%	
<u>Comparable Earnings</u>		
Value Line 2014-16	10.5%	
Utility Proxy Group	10.4%	

**Q. What then is your conclusion as to a fair ROE range for Idaho Power?**

A. Based on my assessment of the relative strengths and weaknesses inherent in each method, and conservatively giving less emphasis to the upper- and lower-most boundaries of the range of results, I concluded that the cost of common equity indicated by my analyses is in the 10.4 percent to 11.4 percent range. After incorporating a minimal adjustment for flotation costs of 15 basis points to my “bare bones” cost of equity range, I concluded that my analyses indicate a fair ROE in the 10.55 percent to 11.55 percent range. As discussed in the testimony of Mr. Keen, Idaho Power is requesting an ROE of 10.50 percent in this case. Because the Company’s requested ROE falls near the bottom end of my “bare bones” cost of equity range, it represents a conservative compromise between balancing the impact on customers and the need to provide Idaho Power with a return that is adequate to compensate investors, maintain financial integrity, and attract capital.

Apart from the results of the quantitative methods summarized above, it is crucial to recognize the importance of supporting the Company’s financial position so

1 that Idaho Power remains prepared to respond to unforeseen events that may  
2 materialize in the future. Recent challenges in the economic and financial market  
3 environment highlight the imperative of maintaining the Company's financial strength  
4 in attracting the capital needed to secure reliable service at a lower cost for  
5 customers. The reasonableness of the Company's requested ROE is reinforced by  
6 the fact that current cost of capital estimates are likely to understate investors'  
7 requirements at the time the outcome of this proceeding becomes effective and  
8 beyond.

9 **Q. Does this conclude your direct testimony?**

10 **A. Yes.**

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of William E. Avera  
Qualifications of William E. Avera

July 29, 2011

## **WILLIAM E. AVERA**

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Financial Concepts and Applications  
*Economic and Financial Counsel*

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Austin, Texas 78751  
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### **Summary of Qualifications**

Ph.D. in economics and finance; Chartered Financial Analyst (CFA<sup>®</sup>) designation; extensive expert witness testimony before courts, alternative dispute resolution panels, regulatory agencies and legislative committees; lectured in executive education programs around the world on ethics, investment analysis, and regulation; undergraduate and graduate teaching in business and economics; appointed to leadership positions in government, industry, academia, and the military.

### **Employment**

*Principal,*  
FINCAP, Inc.  
(Sep. 1979 to present)

Financial, economic and policy consulting to business and government. Perform business and public policy research, cost/benefit analyses and financial modeling, valuation of businesses (almost 200 entities valued), estimation of damages, statistical and industry studies. Provide strategy advice and educational services in public and private sectors, and serve as expert witness before regulatory agencies, legislative committees, arbitration panels, and courts.

*Director, Economic Research  
Division,*  
Public Utility Commission of Texas  
(Dec. 1977 to Aug. 1979)

Responsible for research and testimony preparation on rate of return, rate structure, and econometric analysis dealing with energy, telecommunications, water and sewer utilities. Testified in major rate cases and appeared before legislative committees and served as Chief Economist for agency. Administered state and federal grant funds. Communicated frequently with political leaders and representatives from consumer groups, media, and investment community.

*Manager, Financial Education,*  
International Paper Company  
New York City  
(Feb. 1977 to Nov. 1977)

Directed corporate education programs in accounting, finance, and economics. Developed course materials, recruited and trained instructors, liaison within the company and with academic institutions. Prepared operating budget and designed financial controls for corporate professional development program.

*Lecturer in Finance,*  
The University of Texas at Austin  
(Sep. 1979 to May 1981)  
Assistant Professor of Finance,  
(Sep. 1975 to May 1977)

Taught graduate and undergraduate courses in financial management and investment theory. Conducted research in business and public policy. Named Outstanding Graduate Business Professor and received various administrative appointments.

*Assistant Professor of Business,*  
University of North Carolina at  
Chapel Hill  
(Sep. 1972 to Jul. 1975)

Taught in BBA, MBA, and Ph.D. programs. Created project course in finance, Financial Management for Women, and participated in developing Small Business Management sequence. Organized the North Carolina Institute for Investment Research, a group of financial institutions that supported academic research. Faculty advisor to the Media Board, which funds student publications and broadcast stations.

### **Education**

*Ph.D., Economics and Finance,*  
University of North Carolina at  
Chapel Hill  
(Jan. 1969 to Aug. 1972)

Elective courses included financial management, public finance, monetary theory, and econometrics. Awarded the Stonier Fellowship by the American Bankers' Association and University Teaching Fellowship. Taught statistics, macroeconomics, and microeconomics.

Dissertation: *The Geometric Mean Strategy as a Theory of Multiperiod Portfolio Choice*

*B.A., Economics,*  
Emory University, Atlanta, Georgia  
(Sep. 1961 to Jun. 1965)

Active in extracurricular activities, president of the Barkley Forum (debate team), Emory Religious Association, and Delta Tau Delta chapter. Individual awards and team championships at national collegiate debate tournaments.

### **Professional Associations**

Received Chartered Financial Analyst (CFA) designation in 1977; Vice President for Membership, Financial Management Association; President, Austin Chapter of Planning Executives Institute; Board of Directors, North Carolina Society of Financial Analysts; Candidate Curriculum Committee, Association for Investment Management and Research; Executive Committee of Southern Finance Association; Vice Chair, Staff Subcommittee on Economics and National Association of Regulatory Utility Commissioners (NARUC); Appointed to NARUC Technical Subcommittee on the National Energy Act.

## **Teaching in Executive Education Programs**

*University-Sponsored Programs:* Central Michigan University, Duke University, Louisiana State University, National Defense University, National University of Singapore, Texas A&M University, University of Kansas, University of North Carolina, University of Texas.

*Business and Government-Sponsored Programs:* Advanced Seminar on Earnings Regulation, American Public Welfare Association, Association for Investment Management and Research, Congressional Fellows Program, Cost of Capital Workshop, Electricity Consumers Resource Council, Financial Analysts Association of Indonesia, Financial Analysts Review, Financial Analysts Seminar at Northwestern University, Governor's Executive Development Program of Texas, Louisiana Association of Business and Industry, National Association of Purchasing Management, National Association of Tire Dealers, Planning Executives Institute, School of Banking of the South, State of Wisconsin Investment Board, Stock Exchange of Thailand, Texas Association of State Sponsored Computer Centers, Texas Bankers' Association, Texas Bar Association, Texas Savings and Loan League, Texas Society of CPAs, Tokyo Association of Foreign Banks, Union Bank of Switzerland, U.S. Department of State, U.S. Navy, U.S. Veterans Administration, in addition to Texas state agencies and major corporations.

Presented papers for Mills B. Lane Lecture Series at the University of Georgia and Heubner Lectures at the University of Pennsylvania. Taught graduate courses in finance and economics for evening program at St. Edward's University in Austin from January 1979 through 1998.

## **Expert Witness Testimony**

Testified in over 300 cases before regulatory agencies addressing cost of capital, regulatory policy, rate design, and other economic and financial issues.

*Federal Agencies:* Federal Communications Commission, Federal Energy Regulatory Commission, Surface Transportation Board, Interstate Commerce Commission, and the Canadian Radio-Television and Telecommunications Commission.

*State Regulatory Agencies:* Alaska, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maryland, Michigan, Missouri, Nevada, New Mexico, Montana, Nebraska, North Carolina, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Texas, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming.

Testified in 42 cases before federal and state courts, arbitration panels, and alternative dispute tribunals (89 depositions given) regarding damages, valuation, antitrust liability, fiduciary duties, and other economic and financial issues.

## **Board Positions and Other Professional Activities**

Audit Committee and Outside Director, Georgia System Operations Corporation (electric system operator for member-owned electric cooperatives in Georgia); Chairman, Board of Print Depot, Inc. and FINCAP, Inc.; Co-chair, Synchronous Interconnection Committee, appointed by Public Utility Commission of Texas and approved by governor; Appointed by Hays County Commission to Citizens Advisory Committee of Habitat Conservation Plan, Operator of AAA Ranch, a certified organic producer of agricultural products; Appointed to Organic Livestock Advisory Committee by

Texas Agricultural Commissioner Susan Combs; Appointed by Texas Railroad Commissioners to study group for *The UP/SP Merger: An Assessment of the Impacts on the State of Texas*; Appointed by Hawaii Public Utilities Commission to team reviewing affiliate relationships of Hawaiian Electric Industries; Chairman, Energy Task Force, Greater Austin-San Antonio Corridor Council; Consultant to Public Utility Commission of Texas on cogeneration policy and other matters; Consultant to Public Service Commission of New Mexico on cogeneration policy; Evaluator of Energy Research Grant Proposals for Texas Higher Education Coordinating Board.

### **Community Activities**

Board of Directors, Sustainable Food Center; Chair, Board of Deacons, Finance Committee, and Elder, Central Presbyterian Church of Austin; Founding Member, Orange-Chatham County (N.C.) Legal Aid Screening Committee.

### **Military**

Captain, U.S. Naval Reserve (retired after 28 years service); Commanding Officer, Naval Special Warfare Engineering (SEAL) Support Unit; Officer-in-Charge of SWIFT patrol boat in Vietnam; Enlisted service as weather analyst (advanced to second class petty officer).

### **Bibliography**

#### **Monographs**

*Ethics and the Investment Professional* (video, workbook, and instructor's guide) and *Ethics Challenge Today* (video), Association for Investment Management and Research (1995)

"Definition of Industry Ethics and Development of a Code" and "Applying Ethics in the Real World," in *Good Ethics: The Essential Element of a Firm's Success*, Association for Investment Management and Research (1994)

"On the Use of Security Analysts' Growth Projections in the DCF Model," with Bruce H. Fairchild in *Earnings Regulation Under Inflation*, J. R. Foster and S. R. Holmberg, eds. Institute for Study of Regulation (1982)

*An Examination of the Concept of Using Relative Customer Class Risk to Set Target Rates of Return in Electric Cost-of-Service Studies*, with Bruce H. Fairchild, Electricity Consumers Resource Council (ELCON) (1981); portions reprinted in *Public Utilities Fortnightly* (Nov. 11, 1982)

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*Investment Companies: Analysis of Current Operations and Future Prospects*, with J. Finley Lee and Glenn L. Wood, American College of Life Underwriters (1975)

#### **Articles**

"Should Analysts Own the Stocks they Cover?" *The Financial Journalist*, (March 2002)

"Liquidity, Exchange Listing, and Common Stock Performance," with John C. Groth and Kerry Cooper, *Journal of Economics and Business* (Spring 1985); reprinted by National Association of Security Dealers

- “The Energy Crisis and the Homeowner: The Grief Process,” *Texas Business Review* (Jan.–Feb. 1980); reprinted in *The Energy Picture: Problems and Prospects*, J. E. Pluta, ed., Bureau of Business Research (1980)
- “Use of IFPS at the Public Utility Commission of Texas,” *Proceedings of the IFPS Users Group Annual Meeting* (1979)
- “Production Capacity Allocation: Conversion, CWIP, and One-Armed Economics,” *Proceedings of the NARUC Biennial Regulatory Information Conference* (1978)
- “Some Thoughts on the Rate of Return to Public Utility Companies,” with Bruce H. Fairchild in *Proceedings of the NARUC Biennial Regulatory Information Conference* (1978)
- “A New Capital Budgeting Measure: The Integration of Time, Liquidity, and Uncertainty,” with David Cordell in *Proceedings of the Southwestern Finance Association* (1977)
- “Usefulness of Current Values to Investors and Creditors,” in *Inflation Accounting/Indexing and Stock Behavior* (1977)
- “Consumer Expectations and the Economy,” *Texas Business Review* (Nov. 1976)
- “Portfolio Performance Evaluation and Long-run Capital Growth,” with Henry A. Latané in *Proceedings of the Eastern Finance Association* (1973)
- Book reviews in *Journal of Finance* and *Financial Review*. Abstracts for *CFA Digest*. Articles in *Carolina Financial Times*.

### **Selected Papers and Presentations**

- “Economic Perspective on Water Marketing in Texas,” 2009 Water Law Institute, The University of Texas School of Law, Austin, TX (Dec. 2009).
- “Estimating Utility Cost of Equity in Financial Turmoil,” SNL EXNET 15<sup>th</sup> Annual FERC Briefing, Washington, D.C. (Mar. 2009)
- “The Who, What, When, How, and Why of Ethics,” San Antonio Financial Analysts Society (Jan. 16, 2002). Similar presentation given to the Austin Society of Financial Analysts (Jan. 17, 2002)
- “Ethics for Financial Analysts,” Sponsored by Canadian Council of Financial Analysts: delivered in Calgary, Edmonton, Regina, and Winnipeg, June 1997. Similar presentations given to Austin Society of Financial Analysts (Mar. 1994), San Antonio Society of Financial Analysts (Nov. 1985), and St. Louis Society of Financial Analysts (Feb. 1986)
- “Cost of Capital for Multi-Divisional Corporations,” Financial Management Association, New Orleans, Louisiana (Oct. 1996)
- “Ethics and the Treasury Function,” Government Treasurers Organization of Texas, Corpus Christi, Texas (Jun. 1996)
- “A Cooperative Future,” Iowa Association of Electric Cooperatives, Des Moines (December 1995). Similar presentations given to National G & T Conference, Irving, Texas (June 1995), Kentucky Association of Electric Cooperatives Annual Meeting, Louisville (Nov. 1994), Virginia, Maryland, and Delaware Association of Electric Cooperatives Annual Meeting, Richmond (July 1994), and Carolina Electric Cooperatives Annual Meeting, Raleigh (Mar. 1994)
- “Information Superhighway Warnings: Speed Bumps on Wall Street and Detours from the Economy,” Texas Society of Certified Public Accountants Natural Gas, Telecommunications and Electric Industries Conference, Austin (Apr. 1995)



- "Economic/Wall Street Outlook," Carolinas Council of the Institute of Management Accountants, Myrtle Beach, South Carolina (May 1994). Similar presentation given to Bell Operating Company Accounting Witness Conference, Santa Fe, New Mexico (Apr. 1993)
- "Regulatory Developments in Telecommunications," Regional Holding Company Financial and Accounting Conference, San Antonio (Sep. 1993)
- "Estimating the Cost of Capital During the 1990s: Issues and Directions," The National Society of Rate of Return Analysts, Washington, D.C. (May 1992)
- "Making Utility Regulation Work at the Public Utility Commission of Texas," Center for Legal and Regulatory Studies, University of Texas, Austin (June 1991)
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- "The Role of Utilities in Fostering New Energy Technologies," Emerging Energy Technologies in Texas Conference, Austin (Mar. 1988)
- "The Regulators' Perspective," Bellcore Economic Analysis Conference, San Antonio (Nov. 1987)
- "Public Utility Commissions and the Nuclear Plant Contractor," Construction Litigation Superconference, Laguna Beach, California (Dec. 1986)
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- "Used and Useful Planning Models," Planning Executive Institute, 27th Corporate Planning Conference, Los Angeles (Nov. 1979)
- "Staff Input to Commission Rate of Return Decisions," The National Society of Rate of Return Analysts, New York (Oct. 1979)
- "Discounted Cash Life: A New Measure of the Time Dimension in Capital Budgeting," with David Cordell, Southern Finance Association, New Orleans (Nov. 1978)
- "The Relative Value of Statistics of Ex Post Common Stock Distributions to Explain Variance," with Charles G. Martin, Southern Finance Association, Atlanta (Nov. 1977)
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- "A Pragmatic Approach to the Capital Structure Decision Based on Long-Run Growth," with Henry A. Latané, Financial Management Association, San Diego (Oct. 1974)
- "Growth Rates, Expected Returns, and Variance in Portfolio Selection and Performance Evaluation," with Henry A. Latané, Econometric Society, Oslo, Norway (Aug. 1973)

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of William E. Avera  
DCF Model – Utility Proxy Group

July 29, 2011

DCF MODEL

UTILITY PROXY GROUP

	Company	(a) Dividend Yield			(b) Growth Rates			(c) Growth Rates			(d) Growth Rates			(e) Growth Rates			(f) Cost of Equity Estimates			
		Price	Dividends	Yield	V Line	IBES	Zacks	br+sv	V Line	IBES	Zacks	br+sv	V Line	IBES	Zacks	br+sv	V Line	IBES	Zacks	br+sv
1	Ameren Corp.	\$ 28.25	\$ 1.54	5.5%	-2.0%	-0.7%	4.0%	2.5%	3.5%	4.0%	4.0%	3.5%	4.8%	9.5%	7.9%	8.7%	8.9%	9.2%	10.1%	8.1%
2	American Elec Pwr	\$ 35.17	\$ 1.84	5.2%	3.5%	3.7%	4.0%	4.9%	8.5%	4.7%	3.4%	13.2%	9.4%	9.4%	8.1%	11.0%	10.5%	10.5%	7.7%	7.7%
3	Avista Corp.	\$ 23.15	\$ 1.08	4.7%	8.5%	4.7%	4.7%	3.4%	6.5%	6.0%	3.2%	11.0%	10.5%	10.5%	7.7%	7.0%	9.6%	10.0%	8.9%	8.9%
4	Black Hills Corp.	\$ 32.44	\$ 1.46	4.5%	6.5%	6.0%	6.0%	3.2%	2.5%	5.1%	4.5%	7.0%	9.6%	10.0%	8.9%	11.2%	6.2%	10.2%	7.3%	7.3%
5	CenterPoint Energy	\$ 17.64	\$ 0.79	4.5%	8.0%	3.0%	7.0%	4.1%	8.0%	3.0%	4.1%	11.4%	10.3%	10.2%	7.3%	11.4%	10.3%	9.9%	9.1%	9.1%
6	Cleco Corp.	\$ 34.58	\$ 1.09	3.2%	7.0%	5.9%	5.5%	4.7%	7.0%	5.9%	4.7%	8.9%	6.6%	12.8%	7.6%	11.4%	10.3%	9.9%	9.1%	9.1%
7	CMS Energy	\$ 19.04	\$ 0.84	4.4%	6.0%	3.7%	9.9%	4.7%	6.0%	3.7%	4.7%	8.9%	6.6%	12.8%	7.6%	11.4%	10.3%	9.9%	9.1%	9.1%
8	Constellation Energy	\$ 33.12	\$ 0.96	2.9%	6.0%	3.7%	9.9%	4.7%	6.0%	3.7%	4.7%	8.9%	6.6%	12.8%	7.6%	11.4%	10.3%	9.9%	9.1%	9.1%
9	DTE Energy Co.	\$ 48.37	\$ 2.30	4.8%	5.5%	5.8%	5.0%	3.6%	5.5%	5.8%	3.6%	10.3%	10.6%	9.8%	8.3%	10.3%	10.6%	9.8%	8.3%	8.3%
10	Edison International	\$ 38.20	\$ 1.29	3.4%	-1.0%	4.3%	5.0%	4.7%	-1.0%	4.3%	4.7%	2.4%	7.7%	8.4%	8.1%	2.4%	7.7%	8.4%	8.1%	8.1%
11	Empire District Elec	\$ 21.53	\$ 1.28	5.9%	7.0%	NA	NA	2.6%	7.0%	NA	2.6%	12.9%	NA	NA	8.5%	12.9%	NA	NA	8.5%	8.5%
12	Great Plains Energy	\$ 20.01	\$ 0.83	4.1%	6.0%	7.9%	9.0%	2.1%	6.0%	7.9%	9.0%	10.1%	12.0%	13.1%	6.3%	10.1%	12.0%	13.1%	6.3%	6.3%
13	Hawaiian Elec.	\$ 24.42	\$ 1.24	5.1%	11.5%	7.7%	8.6%	4.3%	11.5%	7.7%	8.6%	16.6%	12.8%	13.7%	9.4%	16.6%	12.8%	13.7%	9.4%	9.4%
14	IDACORP, Inc.	\$ 38.39	\$ 1.20	3.1%	5.5%	4.7%	4.7%	4.9%	5.5%	4.7%	4.9%	8.6%	7.8%	7.8%	8.0%	8.6%	7.8%	7.8%	8.0%	8.0%
15	Integrus Energy Group	\$ 49.62	\$ 2.72	5.5%	9.5%	7.5%	10.4%	3.1%	9.5%	7.5%	3.1%	15.0%	13.0%	15.9%	8.6%	15.0%	13.0%	15.9%	8.6%	8.6%
16	ITC Holdings Corp.	\$ 68.69	\$ 1.37	2.0%	14.0%	16.7%	15.0%	13.7%	14.0%	16.7%	13.7%	16.0%	18.7%	17.0%	15.7%	16.0%	18.7%	17.0%	15.7%	15.7%
17	Otter Tail Corp.	\$ 22.31	\$ 1.19	5.3%	17.0%	16.5%	18.0%	3.5%	17.0%	16.5%	3.5%	22.3%	21.8%	23.3%	8.9%	22.3%	21.8%	23.3%	8.9%	8.9%
18	Pepco Holdings	\$ 18.35	\$ 1.08	5.9%	0.5%	7.0%	4.3%	2.0%	0.5%	7.0%	2.0%	6.4%	12.9%	10.2%	7.9%	6.4%	12.9%	10.2%	7.9%	7.9%
19	PG&E Corp.	\$ 44.06	\$ 1.92	4.4%	6.0%	6.3%	5.5%	6.2%	6.0%	6.3%	6.2%	10.4%	10.7%	9.9%	10.6%	10.4%	10.7%	9.9%	10.6%	10.6%
20	Pinnacle West Capital	\$ 42.53	\$ 2.10	4.9%	6.0%	6.4%	4.7%	3.5%	6.0%	6.4%	3.5%	10.9%	11.3%	9.6%	8.4%	10.9%	11.3%	9.6%	8.4%	8.4%
21	Portland General Elec.	\$ 23.85	\$ 1.07	4.5%	3.0%	4.7%	5.2%	3.7%	3.0%	4.7%	3.7%	7.5%	9.2%	9.7%	8.1%	7.5%	9.2%	9.7%	8.1%	8.1%
22	TECO Energy	\$ 18.68	\$ 0.84	4.5%	8.0%	6.1%	5.3%	6.1%	8.0%	6.1%	6.1%	12.5%	10.6%	9.8%	10.6%	12.5%	10.6%	9.8%	10.6%	10.6%
23	UJL Holdings	\$ 30.19	\$ 1.73	5.7%	3.0%	3.1%	2.7%	5.7%	3.0%	3.1%	5.7%	8.7%	8.8%	8.4%	11.4%	8.7%	8.8%	8.4%	11.4%	11.4%
24	Westar Energy	\$ 25.85	\$ 1.28	5.0%	8.5%	6.2%	5.3%	4.6%	8.5%	6.2%	4.6%	13.5%	11.2%	10.3%	9.6%	13.5%	11.2%	10.3%	9.6%	9.6%
25	Wisconsin Energy	\$ 29.67	\$ 1.04	3.5%	7.5%	8.0%	8.0%	5.5%	7.5%	8.0%	5.5%	11.0%	11.5%	11.5%	9.1%	11.0%	11.5%	11.5%	9.1%	9.1%
<b>Average (g)</b>												<b>11.4%</b>	<b>10.5%</b>	<b>10.4%</b>	<b>9.1%</b>	<b>11.4%</b>	<b>10.5%</b>	<b>10.4%</b>	<b>9.1%</b>	<b>9.1%</b>

(a) www.valueline.com (retrieved Apr. 20, 2011).  
(b) The Value Line Investment Survey (Feb. 4, Feb. 25, & Mar. 25, 2011).  
(c) Thomson ReutersCompany in Context Report (Apr. 19, 2011).  
(d) www.zacks.com (retrieved Apr. 20, 2011).  
(e) See Exhibit 403.  
(f) Sum of dividend yield and respective growth rate.  
(g) Excludes highlighted figures.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of William E. Avera  
Sustainable Growth - Utility Proxy Group

July 29, 2011

**BR+SV GROWTH RATE**

**UTILITY PROXY GROUP**

	(a) 2015		(a)		(b) Adjustment		(c)		(d) "sv" Factor			br + sv
	EPS	DPS	BVPS	r	Factor	Adjusted r	s	v	sv			
1 Ameren Corp.	\$2.50	\$1.54	\$36.50	38.4%	1.0188	7.0%	0.0104	(0.2167)	-0.23%	2.5%		
2 American Elec Pwr	\$3.75	\$2.10	\$36.00	44.0%	1.0287	10.7%	0.0097	0.2000	0.19%	4.9%		
3 Avista Corp.	\$2.00	\$1.30	\$22.50	35.0%	1.0177	9.0%	0.0126	0.1818	0.23%	3.4%		
4 Black Hills Corp.	\$2.50	\$1.55	\$30.75	38.0%	1.0125	8.2%	0.0048	0.0538	0.03%	3.2%		
5 CenterPoint Energy	\$1.30	\$0.90	\$9.75	30.8%	1.0253	13.7%	0.0051	0.5125	0.26%	4.5%		
6 Cleco Corp.	\$2.75	\$1.60	\$28.50	41.8%	1.0265	9.9%	-	0.1231	0.00%	4.1%		
7 CMS Energy	\$1.75	\$1.10	\$14.75	37.1%	1.0300	12.2%	0.0063	0.3140	0.20%	4.7%		
8 Constellation Energy	\$3.25	\$1.00	\$47.75	69.2%	1.0250	7.0%	0.0083	(0.1938)	-0.16%	4.7%		
9 DTE Energy Co.	\$4.25	\$2.70	\$46.50	36.5%	1.0200	9.3%	0.0086	0.1913	0.16%	3.6%		
10 Edison International	\$3.25	\$1.40	\$40.25	56.9%	1.0198	8.2%	-	(0.0063)	0.00%	4.7%		
11 Empire District Elec	\$1.75	\$1.35	\$17.50	22.9%	1.0119	10.1%	0.0080	0.3000	0.24%	2.6%		
12 Great Plains Energy	\$1.75	\$1.20	\$23.50	31.4%	1.0231	7.6%	0.0241	(0.1190)	-0.29%	2.1%		
13 Hawaiian Elec.	\$2.00	\$1.30	\$18.00	35.0%	1.0183	11.3%	0.0127	0.2653	0.34%	4.3%		
14 IDACORP, Inc.	\$3.10	\$1.40	\$36.50	54.8%	1.0230	8.7%	0.0131	0.0875	0.11%	4.9%		
15 Integrys Energy Group	\$4.00	\$2.72	\$42.75	32.0%	1.0141	9.5%	0.0033	0.1000	0.03%	3.1%		
16 ITC Holdings Corp.	\$5.50	\$1.75	\$35.50	68.2%	1.0553	16.4%	0.0398	0.6359	2.53%	13.7%		
17 Otter Tail Corp.	\$1.85	\$1.30	\$21.45	29.7%	1.0353	8.9%	0.0401	0.2200	0.88%	3.5%		
18 Pepco Holdings	\$1.55	\$1.12	\$21.60	27.7%	1.0210	7.3%	0.0126	(0.0286)	-0.04%	2.0%		
19 PG&E Corp.	\$4.25	\$2.20	\$36.25	48.2%	1.0306	12.1%	0.0162	0.2368	0.38%	6.2%		
20 Pinnacle West Capital	\$3.50	\$2.30	\$38.25	34.3%	1.0227	9.4%	0.0264	0.1000	0.26%	3.5%		
21 Portland General Elec.	\$2.00	\$1.20	\$23.75	40.0%	1.0291	8.7%	0.0382	0.0500	0.19%	3.7%		
22 TECO Energy	\$1.75	\$1.00	\$13.25	42.9%	1.0289	13.6%	0.0075	0.3690	0.28%	6.1%		
23 UIL Holdings	\$2.35	\$1.73	\$27.00	26.4%	1.0819	9.4%	0.1394	0.2286	3.19%	5.7%		
24 Westar Energy	\$2.40	\$1.44	\$24.00	40.0%	1.0207	10.2%	0.0275	0.2000	0.55%	4.6%		
25 Wisconsin Energy	\$2.50	\$1.40	\$20.25	44.0%	1.0215	12.6%	-	0.4600	0.00%	5.5%		

BR+SV GROWTH RATE

UTILITY PROXY GROUP

Company	2010				2015				Chg	2015 Price			Common Shares		Growth
	Eq Ratio	Tot Cap	Com Eq	Eq Ratio	Tot Cap	Com Eq	Eq Ratio	High		Low	Avg.	M/B	2010	2015	
1 Ameren Corp.	50.9%	\$15,185	\$7,729	53.0%	\$17,600	\$9,328	3.8%	\$35.00	\$25.00	\$30.00	0.822	240.40	256.00	1.27%	
2 American Elec Pwr	46.5%	\$29,185	\$13,571	50.5%	\$35,800	\$18,079	5.9%	\$55.00	\$35.00	\$45.00	1.250	481.00	500.00	0.78%	
3 Avista Corp.	51.5%	\$2,200	\$1,133	52.0%	\$2,600	\$1,352	3.6%	\$30.00	\$25.00	\$27.50	1.222	57.00	60.00	1.03%	
4 Black Hills Corp.	50.0%	\$2,425	\$1,213	49.5%	\$2,775	\$1,374	2.5%	\$40.00	\$25.00	\$32.50	1.057	43.75	44.75	0.45%	
5 CenterPoint Energy	26.2%	\$12,199	\$3,196	29.0%	\$14,200	\$4,118	5.2%	\$25.00	\$15.00	\$20.00	2.051	424.70	430.00	0.25%	
6 Cleco Corp.	48.5%	\$2,718	\$1,318	55.0%	\$3,125	\$1,719	5.5%	\$40.00	\$25.00	\$32.50	1.140	60.75	60.75	0.00%	
7 CMS Energy	29.5%	\$9,473	\$2,795	34.0%	\$11,100	\$3,774	6.2%	\$25.00	\$18.00	\$21.50	1.458	249.60	255.00	0.43%	
8 Constellation Energy	62.8%	\$12,468	\$7,830	67.5%	\$14,900	\$10,058	5.1%	\$50.00	\$30.00	\$40.00	0.838	199.00	209.00	0.99%	
9 DTE Energy Co.	48.7%	\$13,811	\$6,726	47.5%	\$17,300	\$8,218	4.1%	\$70.00	\$45.00	\$57.50	1.237	170.00	176.00	0.70%	
10 Edison International	45.5%	\$23,600	\$10,738	45.0%	\$29,100	\$13,095	4.0%	\$50.00	\$30.00	\$40.00	0.994	325.81	325.81	0.00%	
11 Empire District Elec	48.7%	\$1,351	\$658	52.0%	\$1,425	\$741	2.4%	\$30.00	\$20.00	\$25.00	1.429	41.58	42.75	0.56%	
12 Great Plains Energy	49.2%	\$5,868	\$2,887	48.5%	\$7,500	\$3,638	4.7%	\$25.00	\$17.00	\$21.00	0.894	135.71	155.00	2.69%	
13 Hawaiian Elec.	54.5%	\$2,740	\$1,493	52.0%	\$3,450	\$1,794	3.7%	\$30.00	\$19.00	\$24.50	1.361	94.50	99.00	0.93%	
14 IDACORP, Inc.	51.0%	\$2,950	\$1,505	50.5%	\$3,750	\$1,894	4.7%	\$50.00	\$30.00	\$40.00	1.096	49.00	52.00	1.20%	
15 Integrys Energy Group	56.8%	\$5,119	\$2,907	54.0%	\$6,200	\$3,348	2.9%	\$55.00	\$40.00	\$47.50	1.111	77.35	78.50	0.30%	
16 ITC Holdings Corp.	30.9%	\$3,614	\$1,117	33.5%	\$5,800	\$1,943	11.7%	\$115.00	\$80.00	\$97.50	2.746	50.72	54.50	1.45%	
17 Otter Tail Corp.	59.2%	\$1,067	\$632	61.0%	\$1,475	\$900	7.3%	\$35.00	\$20.00	\$27.50	1.282	36.00	42.00	3.13%	
18 Pepco Holdings	52.5%	\$8,000	\$4,200	48.0%	\$10,800	\$5,184	4.3%	\$25.00	\$17.00	\$21.00	0.972	225.00	240.00	1.30%	
19 PG&E Corp.	49.5%	\$22,575	\$11,175	54.0%	\$28,100	\$15,174	6.3%	\$55.00	\$40.00	\$47.50	1.310	395.00	420.00	1.23%	
20 Pinnacle West Capital	56.0%	\$6,625	\$3,710	53.5%	\$8,700	\$4,655	4.6%	\$50.00	\$35.00	\$42.50	1.111	108.50	122.00	2.37%	
21 Portland General Elec.	47.0%	\$3,400	\$1,598	50.0%	\$4,275	\$2,138	6.0%	\$30.00	\$20.00	\$25.00	1.053	75.30	90.00	3.63%	
22 TECO Energy	40.8%	\$5,318	\$2,170	47.5%	\$6,100	\$2,898	6.0%	\$25.00	\$17.00	\$21.00	1.585	214.90	220.00	0.47%	
23 UIL Holdings	47.5%	\$1,250	\$594	41.5%	\$3,250	\$1,349	17.8%	\$40.00	\$30.00	\$35.00	1.296	30.00	50.00	10.76%	
24 Westar Energy	46.4%	\$5,181	\$2,404	45.5%	\$6,500	\$2,958	4.2%	\$35.00	\$25.00	\$30.00	1.250	112.13	125.00	2.20%	
25 Wisconsin Energy	49.0%	\$7,765	\$3,805	48.0%	\$9,825	\$4,716	4.4%	\$45.00	\$30.00	\$37.50	1.852	233.80	233.80	0.00%	

- (a) The Value Line Investment Survey (Feb. 4, Feb. 25, & Mar. 25, 2011).
- (b) Computed using the formula  $2^{*(1+5\text{-Yr. Change in Equity})/(2+5\text{ Yr. Change in Equity})}$ .
- (c) Product of average year-end "r" for 2015 and Adjustment Factor.
- (d) Product of change in common shares outstanding and M/B Ratio.
- (e) Computed as  $1 - B/M$  Ratio.
- (f) Product of total capital and equity ratio.
- (g) Five-year rate of change.
- (h) Average of High and Low expected market prices divided by 2014-16 BVPS.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of William E. Avera  
DCF Model – Non-Utility Proxy Group

July 29, 2011

## DCF MODEL

NON-UTILITY PROXY GROUP

	(a)	(a)	(b)	(c)	(d)	(e)	(e)	(e)	(e)
	Dividend	Growth Rates				Cost of Equity Estimates			
Company	Yield	V Line	IBES	Zacks	br+sv	V Line	IBES	Zacks	br+sv
1 3M Company	2.39%	7.0%	11.9%	11.3%	12.9%	9.4%	14.3%	13.7%	15.3%
2 Abbott Labs.	3.67%	10.0%	8.9%	9.0%	15.0%	13.7%	12.6%	12.7%	18.7%
3 Alberto-Culver	1.02%	15.0%	9.4%	12.5%	8.4%	16.0%	10.4%	13.5%	9.4%
4 AT&T Inc.	6.09%	5.5%	5.7%	7.0%	5.4%	11.6%	11.8%	13.1%	11.5%
5 Automatic Data Proc.	2.93%	8.0%	10.6%	10.8%	9.5%	10.9%	13.5%	13.7%	12.4%
6 Bard (C.R.)	0.77%	9.5%	10.9%	11.8%	18.1%	10.3%	11.7%	12.6%	18.9%
7 Baxter Int'l Inc.	2.45%	10.0%	9.6%	9.3%	15.5%	12.5%	12.1%	11.8%	17.9%
8 Becton, Dickinson	1.97%	9.5%	9.9%	10.8%	9.0%	11.5%	11.9%	12.8%	11.0%
9 Bristol-Myers Squibb	5.11%	8.5%	1.8%	2.0%	5.7%	13.6%	6.9%	7.1%	10.8%
10 Brown-Forman 'B'	1.90%	7.5%	10.9%	13.0%	10.6%	9.4%	12.8%	14.9%	12.5%
11 Chubb Corp.	2.55%	2.5%	8.7%	9.8%	8.0%	5.1%	11.3%	12.4%	10.5%
12 Church & Dwight	0.97%	12.0%	11.8%	12.0%	10.3%	13.0%	12.8%	13.0%	11.3%
13 Coca-Cola	2.80%	9.5%	8.7%	9.0%	9.9%	12.3%	11.5%	11.8%	12.7%
14 Colgate-Palmolive	2.76%	11.0%	9.3%	9.2%	18.1%	13.8%	12.1%	12.0%	20.8%
15 Commerce Bancshs.	2.22%	7.0%	7.0%	7.0%	7.9%	9.2%	9.2%	9.2%	10.1%
16 ConAgra Foods	3.92%	10.5%	7.7%	8.0%	8.1%	14.4%	11.6%	11.9%	12.0%
17 Costco Wholesale	1.24%	7.5%	13.3%	12.9%	8.2%	8.7%	14.5%	14.1%	9.5%
18 Cullen/Frost Bankers	2.96%	4.5%	8.5%	8.0%	5.7%	7.5%	11.5%	11.0%	8.6%
19 CVS Caremark Corp.	1.42%	9.5%	10.1%	12.0%	7.8%	10.9%	11.5%	13.4%	9.2%
20 Ecolab Inc.	1.41%	12.0%	13.2%	13.2%	19.6%	13.4%	14.6%	14.6%	21.0%
21 Exxon Mobil Corp.	2.26%	6.0%	12.1%	8.4%	13.5%	8.3%	14.4%	10.7%	15.7%
22 Gen'l Mills	3.02%	9.5%	7.7%	8.0%	9.3%	12.5%	10.7%	11.0%	12.3%
23 Heinz (H.J.)	3.85%	6.5%	7.0%	8.0%	13.9%	10.4%	10.9%	11.9%	17.8%
24 Hormel Foods	2.01%	10.5%	10.0%	9.3%	10.7%	12.5%	12.0%	11.3%	12.7%
25 Int'l Business Mach.	1.77%	13.0%	11.5%	9.3%	20.4%	14.8%	13.3%	11.1%	22.2%
26 Johnson & Johnson	3.44%	4.5%	6.0%	5.8%	10.8%	7.9%	9.4%	9.2%	14.2%
27 Kellogg	3.14%	9.5%	8.6%	9.0%	9.7%	12.6%	11.7%	12.1%	12.9%
28 Kimberly-Clark	4.09%	6.5%	7.5%	8.7%	18.6%	10.6%	11.6%	12.8%	22.7%
29 Kraft Foods	3.71%	8.0%	8.4%	8.0%	10.7%	11.7%	12.1%	11.7%	14.4%
30 Lilly (Eli)	5.64%	-2.5%	-6.4%	-5.3%	8.4%	3.1%	-0.8%	0.3%	14.0%
31 Lockheed Martin	3.78%	10.0%	8.1%	6.8%	20.3%	13.8%	11.9%	10.6%	24.1%
32 McCormick & Co.	2.24%	8.5%	9.6%	9.5%	13.3%	10.7%	11.8%	11.7%	15.6%
33 McDonald's Corp.	3.25%	9.5%	9.8%	9.3%	10.7%	12.8%	13.1%	12.6%	13.9%
34 McKesson Corp.	0.98%	10.0%	14.2%	11.0%	11.7%	11.0%	15.2%	12.0%	12.7%
35 Medtronic, Inc.	2.47%	7.5%	8.8%	8.4%	11.7%	10.0%	11.3%	10.9%	14.1%
36 Microsoft Corp.	2.26%	12.5%	11.3%	11.7%	15.3%	14.8%	13.6%	14.0%	17.5%
37 NIKE, Inc. 'B'	1.49%	9.5%	10.9%	12.5%	12.2%	11.0%	12.4%	14.0%	13.7%
38 Northrop Grumman	2.82%	12.5%	11.0%	11.1%	7.9%	15.3%	13.8%	13.9%	10.7%
39 PepsiCo, Inc.	2.91%	11.0%	8.9%	9.5%	14.5%	13.9%	11.8%	12.4%	17.4%
40 Pfizer, Inc.	4.50%	5.0%	2.8%	3.5%	7.0%	9.5%	7.3%	8.0%	11.5%
41 Procter & Gamble	3.01%	8.0%	8.9%	9.2%	7.2%	11.0%	11.9%	12.2%	10.3%
42 Raytheon Co.	3.02%	10.0%	8.0%	10.0%	8.6%	13.0%	11.0%	13.0%	11.6%
43 Stryker Corp.	1.26%	12.5%	10.9%	11.4%	13.6%	13.8%	12.2%	12.7%	14.9%
44 Sysco Corp.	3.47%	8.0%	10.0%	9.7%	14.2%	11.5%	13.5%	13.2%	17.6%
45 TJX Companies	1.28%	13.5%	14.5%	14.4%	11.1%	14.8%	15.8%	15.7%	12.4%
46 United Parcel Serv.	2.59%	9.0%	11.7%	11.5%	17.9%	11.6%	14.3%	14.1%	20.5%
47 Verizon Commun.	5.63%	4.0%	6.2%	14.9%	5.7%	9.6%	11.8%	20.5%	11.3%
48 Walgreen Co.	1.68%	11.5%	13.4%	13.0%	8.4%	13.2%	15.1%	14.7%	10.1%
49 Wal-Mart Stores	2.16%	10.0%	10.7%	11.3%	9.9%	12.2%	12.9%	13.5%	12.1%
50 Waste Management	3.52%	5.5%	9.6%	11.0%	5.2%	9.0%	13.1%	14.5%	8.7%
<b>Average (f)</b>						<b>11.9%</b>	<b>12.4%</b>	<b>12.5%</b>	<b>12.1%</b>

(a) www.valueline.com (retrieved Jan. 28, 2011).

(b) Thomson Reuters Company in Context Report (Jan. 28, 2011).

(c) www.zacks.com (retrieved Jan. 31, 2011).

(d) See Exhibit 405.

(e) Sum of dividend yield and respective growth rate.

(f) Excludes highlighted figures.



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of William E. Avera  
Sustainable Growth – Non-Utility Proxy Group

July 29, 2011

## BR+SV GROWTH RATE

## NON-UTILITY PROXY GROUP

	<u>Company</u>	(a)			(b)			(c)			(d)			(e)	<b>br + sv</b>
		2014	2014	2014	Adjust.			"sv" Factor							
		<u>EPS</u>	<u>DPS</u>	<u>BVPS</u>	<u>b</u>	<u>r</u>	<u>Factor</u>	<u>Adj. r</u>	<u>br</u>	<u>s</u>	<u>v</u>	<u>sv</u>			
1	3M Company	\$7.60	\$3.10	\$40.05	59.2%	19.0%	1.0818	20.5%	12.2%	0.0106	0.6731	0.71%	<b>12.9%</b>		
2	Abbott Labs.	\$5.70	\$2.18	\$22.05	61.8%	25.9%	1.0384	26.8%	16.6%	(0.0197)	0.7900	-1.56%	<b>15.0%</b>		
3	Alberto-Culver	\$2.35	\$0.55	\$17.85	76.6%	13.2%	1.0315	13.6%	10.4%	(0.0330)	0.6033	-1.99%	<b>8.4%</b>		
4	AT&T Inc.	\$3.25	\$2.00	\$24.05	38.5%	13.5%	1.0327	14.0%	5.4%	(0.0001)	0.4656	-0.01%	<b>5.4%</b>		
5	Automatic Data Proc.	\$3.45	\$1.60	\$22.95	53.6%	15.0%	1.0786	16.2%	8.7%	0.0111	0.7039	0.78%	<b>9.5%</b>		
6	Bard (C.R.)	\$7.75	\$0.85	\$31.45	89.0%	24.6%	1.0255	25.3%	22.5%	(0.0564)	0.7754	-4.37%	<b>18.1%</b>		
7	Baxter Int'l Inc.	\$5.85	\$1.50	\$22.90	74.4%	25.5%	1.0560	27.0%	20.1%	(0.0633)	0.7224	-4.57%	<b>15.5%</b>		
8	Becton, Dickinson	\$7.65	\$2.20	\$34.10	71.2%	22.4%	1.0306	23.1%	16.5%	(0.1030)	0.7216	-7.43%	<b>9.0%</b>		
9	Bristol-Myers Squibb	\$2.35	\$1.54	\$11.65	34.5%	20.2%	1.0263	20.7%	7.1%	(0.0212)	0.6671	-1.42%	<b>5.7%</b>		
10	Brown-Forman 'B'	\$4.50	\$1.48	\$20.40	67.1%	22.1%	1.0372	22.9%	15.4%	(0.0640)	0.7368	-4.71%	<b>10.6%</b>		
11	Chubb Corp.	\$7.00	\$1.60	\$64.85	77.1%	10.8%	1.0184	11.0%	8.5%	(0.0319)	0.1632	-0.52%	<b>8.0%</b>		
12	Church & Dwight	\$5.80	\$1.00	\$39.25	82.8%	14.8%	1.0465	15.5%	12.8%	(0.0414)	0.6075	-2.52%	<b>10.3%</b>		
13	Coca-Cola	\$4.95	\$2.48	\$18.20	49.9%	27.2%	1.0479	28.5%	14.2%	(0.0526)	0.8267	-4.34%	<b>9.9%</b>		
14	Colgate-Palmolive	\$7.20	\$3.20	\$13.25	55.6%	54.3%	1.0671	58.0%	32.2%	(0.1557)	0.9086	-14.15%	<b>18.1%</b>		
15	Commerce Bancshs.	\$3.35	\$1.15	\$32.10	65.7%	10.4%	1.0480	10.9%	7.2%	0.0240	0.2867	0.69%	<b>7.9%</b>		
16	ConAgra Foods	\$2.35	\$1.00	\$15.00	57.4%	15.7%	1.0288	16.1%	9.3%	(0.0217)	0.5385	-1.17%	<b>8.1%</b>		
17	Costco Wholesale	\$4.20	\$0.95	\$33.50	77.4%	12.5%	1.0315	12.9%	10.0%	(0.0301)	0.5939	-1.79%	<b>8.2%</b>		
18	Cullen/Frost Bankers	\$4.35	\$2.10	\$44.00	51.7%	9.9%	1.0382	10.3%	5.3%	0.0132	0.2667	0.35%	<b>5.7%</b>		
19	CVS Caremark Corp.	\$4.00	\$0.56	\$38.15	86.0%	10.5%	1.0268	10.8%	9.3%	(0.0395)	0.3642	-1.44%	<b>7.8%</b>		
20	Ecolab Inc.	\$3.60	\$0.85	\$14.45	76.4%	24.9%	1.0530	26.2%	20.0%	(0.0056)	0.7592	-0.43%	<b>19.6%</b>		
21	Exxon Mobil Corp.	\$9.35	\$2.05	\$45.50	78.1%	20.5%	1.0546	21.7%	16.9%	(0.0578)	0.5956	-3.44%	<b>13.5%</b>		
22	Gen'l Mills	\$3.15	\$1.36	\$11.95	56.8%	26.4%	1.0318	27.2%	15.5%	(0.0809)	0.7610	-6.16%	<b>9.3%</b>		
23	Heinz (H.J.)	\$4.10	\$2.32	\$14.65	43.4%	28.0%	1.0908	30.5%	13.3%	0.0085	0.7830	0.66%	<b>13.9%</b>		
24	Hormel Foods	\$2.10	\$0.70	\$13.55	66.7%	15.5%	1.0527	16.3%	10.9%	(0.0025)	0.6387	-0.16%	<b>10.7%</b>		
25	Int'l Business Mach.	\$18.00	\$3.60	\$48.75	80.0%	36.9%	1.0856	40.1%	32.1%	(0.1501)	0.7759	-11.65%	<b>20.4%</b>		
26	Johnson & Johnson	\$5.85	\$2.65	\$27.60	54.7%	21.2%	1.0378	22.0%	12.0%	(0.0185)	0.6846	-1.26%	<b>10.8%</b>		
27	Kellogg	\$5.10	\$1.88	\$9.95	63.1%	51.3%	1.0352	53.1%	33.5%	(0.2690)	0.8829	-23.75%	<b>9.7%</b>		
28	Kimberly-Clark	\$6.25	\$2.75	\$15.55	56.0%	40.2%	1.0140	40.8%	22.8%	(0.0506)	0.8363	-4.24%	<b>18.6%</b>		
29	Kraft Foods	\$3.00	\$1.40	\$24.00	53.3%	12.5%	1.0480	13.1%	7.0%	0.0716	0.5200	3.72%	<b>10.7%</b>		
30	Lilly (Eli)	\$3.40	\$2.20	\$15.60	35.3%	21.8%	1.0636	23.2%	8.2%	0.0032	0.6716	0.21%	<b>8.4%</b>		
31	Lockheed Martin	\$13.25	\$3.50	\$31.25	73.6%	42.4%	1.0882	46.1%	34.0%	(0.1663)	0.8188	-13.62%	<b>20.3%</b>		
32	McCormick & Co.	\$3.50	\$1.36	\$18.95	61.1%	18.5%	1.0649	19.7%	12.0%	0.0178	0.7293	1.30%	<b>13.3%</b>		
33	McDonald's Corp.	\$6.05	\$3.00	\$19.00	50.4%	31.8%	1.0303	32.8%	16.5%	(0.0734)	0.8000	-5.87%	<b>10.7%</b>		
34	McKesson Corp.	\$6.80	\$0.72	\$46.65	89.4%	14.6%	1.0421	15.2%	13.6%	(0.0380)	0.4957	-1.88%	<b>11.7%</b>		
35	Medtronic, Inc.	\$4.50	\$1.18	\$25.95	73.8%	17.3%	1.0597	18.4%	13.6%	(0.0326)	0.5848	-1.91%	<b>11.7%</b>		
36	Microsoft Corp.	\$3.35	\$0.96	\$10.75	71.3%	31.2%	1.0763	33.5%	23.9%	(0.1104)	0.7850	-8.66%	<b>15.3%</b>		
37	NIKE, Inc. 'B'	\$5.65	\$1.50	\$34.60	73.5%	16.3%	1.0643	17.4%	12.8%	(0.0085)	0.6358	-0.54%	<b>12.2%</b>		
38	Northrop Grumman	\$10.25	\$2.50	\$68.00	75.6%	15.1%	1.0293	15.5%	11.7%	(0.0783)	0.4868	-3.81%	<b>7.9%</b>		
39	PepsiCo, Inc.	\$6.40	\$2.34	\$24.00	63.4%	26.7%	1.0724	28.6%	18.1%	(0.0449)	0.8118	-3.64%	<b>14.5%</b>		
40	Pfizer, Inc.	\$2.05	\$1.16	\$13.00	43.4%	15.8%	1.0154	16.0%	7.0%	-	0.5273	0.00%	<b>7.0%</b>		
41	Procter & Gamble	\$5.25	\$2.18	\$29.45	58.5%	17.8%	1.0230	18.2%	10.7%	(0.0495)	0.6900	-3.41%	<b>7.2%</b>		
42	Raytheon Co.	\$7.20	\$2.00	\$38.65	72.2%	18.6%	1.0231	19.1%	13.8%	(0.0870)	0.5932	-5.16%	<b>8.6%</b>		
43	Stryker Corp.	\$5.35	\$0.84	\$32.75	84.3%	16.3%	1.0660	17.4%	14.7%	(0.0144)	0.7213	-1.04%	<b>13.6%</b>		
44	Sysco Corp.	\$2.75	\$1.10	\$10.10	60.0%	27.2%	1.0502	28.6%	17.2%	(0.0385)	0.7756	-2.98%	<b>14.2%</b>		
45	TJX Companies	\$4.80	\$0.80	\$12.75	83.3%	37.6%	1.0374	39.1%	32.5%	(0.2565)	0.8355	-21.43%	<b>11.1%</b>		
46	United Parcel Serv.	\$5.50	\$2.20	\$19.30	60.0%	28.5%	1.0912	31.1%	18.7%	(0.0090)	0.8245	-0.75%	<b>17.9%</b>		
47	Verizon Communic.	\$3.05	\$1.96	\$18.95	35.7%	16.1%	1.0250	16.5%	5.9%	(0.0032)	0.6555	-0.21%	<b>5.7%</b>		
48	Walgreen Co.	\$3.65	\$1.00	\$21.15	72.6%	17.3%	1.0252	17.7%	12.8%	(0.0684)	0.6475	-4.43%	<b>8.4%</b>		
49	Wal-Mart Stores	\$6.05	\$1.75	\$23.40	71.1%	25.9%	1.0072	26.0%	18.5%	(0.1157)	0.7400	-8.56%	<b>9.9%</b>		
50	Waste Management	\$2.90	\$1.60	\$15.30	44.8%	19.0%	1.0079	19.1%	8.6%	(0.0515)	0.6600	-3.40%	<b>5.2%</b>		

## BR+SV GROWTH RATE

NON-UTILITY PROXY GROUP

		(a)	(a)	(f)	(a)	(a)	(g)	(a)	(a)	(f)	
		---- Common Equity ----			----- 2014 Price -----				---- Common Shares ----		
<u>Company</u>	<u>2009</u>	<u>2014</u>	<u>Chg.</u>	<u>High</u>	<u>Low</u>	<u>Avg.</u>	<u>M/B</u>	<u>2009</u>	<u>2014</u>	<u>Growth</u>	
1	3M Company	\$12,764	\$28,975	17.8%	\$135.00	\$110.00	\$122.50	3.059	710.60	723.00	0.35%
2	Abbott Labs.	\$22,856	\$33,550	8.0%	\$115.00	\$95.00	\$105.00	4.762	1,551.90	1,520.00	-0.41%
3	Alberto-Culver	\$1,197	\$1,640	6.5%	\$50.00	\$40.00	\$45.00	2.521	98.26	92.00	-1.31%
4	AT&T Inc.	\$102,339	\$141,895	6.8%	\$50.00	\$40.00	\$45.00	1.871	5,901.90	5,900.00	-0.01%
5	Automatic Data Proc.	\$5,323	\$11,700	17.1%	\$85.00	\$70.00	\$77.50	3.377	501.70	510.00	0.33%
6	Bard (C.R.)	\$2,194	\$2,830	5.2%	\$155.00	\$125.00	\$140.00	4.452	95.92	90.00	-1.27%
7	Baxter Int'l Inc.	\$7,191	\$12,600	11.9%	\$90.00	\$75.00	\$82.50	3.603	600.97	550.00	-1.76%
8	Becton, Dickinson	\$5,143	\$6,985	6.3%	\$135.00	\$110.00	\$122.50	3.592	237.08	205.00	-2.87%
9	Bristol-Myers Squibb	\$14,785	\$19,230	5.4%	\$40.00	\$30.00	\$35.00	3.004	1,709.50	1,650.00	-0.71%
10	Brown-Forman 'B'	\$1,895	\$2,750	7.7%	\$85.00	\$70.00	\$77.50	3.799	146.96	135.00	-1.68%
11	Chubb Corp.	\$15,634	\$18,800	3.8%	\$85.00	\$70.00	\$77.50	1.195	332.01	290.00	-2.67%
12	Church & Dwight	\$1,602	\$2,550	9.7%	\$110.00	\$90.00	\$100.00	2.548	70.55	65.00	-1.63%
13	Coca-Cola	\$24,799	\$40,035	10.1%	\$115.00	\$95.00	\$105.00	5.769	2,303.00	2,200.00	-0.91%
14	Colgate-Palmolive	\$3,116	\$6,100	14.4%	\$160.00	\$130.00	\$145.00	10.943	494.17	460.00	-1.42%
15	Commerce Bancshs.	\$1,886	\$3,050	10.1%	\$50.00	\$40.00	\$45.00	1.402	87.26	95.00	1.71%
16	ConAgra Foods	\$4,721	\$6,300	5.9%	\$35.00	\$30.00	\$32.50	2.167	441.66	420.00	-1.00%
17	Costco Wholesale	\$10,018	\$13,725	6.5%	\$90.00	\$75.00	\$82.50	2.463	435.97	410.00	-1.22%
18	Cullen/Frost Bankers	\$1,894	\$2,775	7.9%	\$65.00	\$55.00	\$60.00	1.364	60.04	63.00	0.97%
19	CVS Caremark Corp.	\$35,768	\$46,750	5.5%	\$65.00	\$55.00	\$60.00	1.573	1,391.00	1,225.00	-2.51%
20	Ecolab Inc.	\$2,001	\$3,400	11.2%	\$65.00	\$55.00	\$60.00	4.152	236.60	235.00	-0.14%
21	Exxon Mobil Corp.	\$110,569	\$191,000	11.6%	\$125.00	\$100.00	\$112.50	2.473	4,727.00	4,200.00	-2.34%
22	Gen'l Mills	\$5,175	\$7,115	6.6%	\$55.00	\$45.00	\$50.00	4.184	656.00	595.00	-1.93%
23	Heinz (H.J.)	\$1,891	\$4,700	20.0%	\$75.00	\$60.00	\$67.50	4.608	318.06	321.00	0.18%
24	Hormel Foods	\$2,124	\$3,600	11.1%	\$40.00	\$35.00	\$37.50	2.768	267.19	266.00	-0.09%
25	Int'l Business Mach.	\$22,755	\$53,650	18.7%	\$240.00	\$195.00	\$217.50	4.462	1,305.30	1,100.00	-3.36%
26	Johnson & Johnson	\$50,588	\$73,850	7.9%	\$95.00	\$80.00	\$87.50	3.170	2,754.30	2,675.00	-0.58%
27	Kellogg	\$2,272	\$3,230	7.3%	\$95.00	\$75.00	\$85.00	8.543	381.38	325.00	-3.15%
28	Kimberly-Clark	\$5,406	\$6,220	2.8%	\$105.00	\$85.00	\$95.00	6.109	417.00	400.00	-0.83%
29	Kraft Foods	\$25,972	\$42,000	10.1%	\$55.00	\$45.00	\$50.00	2.083	1,477.90	1,750.00	3.44%
30	Lilly (Eli)	\$9,524	\$18,000	13.6%	\$50.00	\$45.00	\$47.50	3.045	1,149.00	1,155.00	0.10%
31	Lockheed Martin	\$4,129	\$10,000	19.4%	\$190.00	\$155.00	\$172.50	5.520	372.90	320.00	-3.01%
32	McCormick & Co.	\$1,335	\$2,555	13.9%	\$75.00	\$65.00	\$70.00	3.694	131.80	135.00	0.48%
33	McDonald's Corp.	\$14,034	\$19,000	6.2%	\$105.00	\$85.00	\$95.00	5.000	1,076.70	1,000.00	-1.47%
34	McKesson Corp.	\$7,532	\$11,480	8.8%	\$100.00	\$85.00	\$92.50	1.983	271.00	246.00	-1.92%
35	Medtronic, Inc.	\$14,629	\$26,600	12.7%	\$70.00	\$55.00	\$62.50	2.408	1,097.30	1,025.00	-1.35%
36	Microsoft Corp.	\$39,558	\$85,000	16.5%	\$55.00	\$45.00	\$50.00	4.651	8,908.00	7,900.00	-2.37%
37	NIKE, Inc. 'B'	\$8,693	\$16,550	13.7%	\$105.00	\$85.00	\$95.00	2.746	485.50	478.00	-0.31%
38	Northrop Grumman	\$12,687	\$17,000	6.0%	\$145.00	\$120.00	\$132.50	1.949	306.87	250.00	-4.02%
39	PepsiCo, Inc.	\$17,442	\$36,015	15.6%	\$140.00	\$115.00	\$127.50	5.313	1,565.00	1,500.00	-0.84%
40	Pfizer, Inc.	\$90,014	\$105,000	3.1%	\$30.00	\$25.00	\$27.50	2.115	8,070.00	8,070.00	0.00%
41	Procter & Gamble	\$63,099	\$79,455	4.7%	\$105.00	\$85.00	\$95.00	3.226	2,917.00	2,700.00	-1.53%
42	Raytheon Co.	\$9,827	\$12,375	4.7%	\$105.00	\$85.00	\$95.00	2.458	383.20	320.00	-3.54%
43	Stryker Corp.	\$6,595	\$12,775	14.1%	\$130.00	\$105.00	\$117.50	3.588	397.90	390.00	-0.40%
44	Sysco Corp.	\$3,450	\$5,700	10.6%	\$50.00	\$40.00	\$45.00	4.455	590.03	565.00	-0.86%
45	TJX Companies	\$2,889	\$4,200	7.8%	\$85.00	\$70.00	\$77.50	6.078	409.39	330.00	-4.22%
46	United Parcel Serv.	\$7,630	\$19,035	20.1%	\$120.00	\$100.00	\$110.00	5.699	992.85	985.00	-0.16%
47	Verizon Communic.	\$41,600	\$53,439	5.1%	\$60.00	\$50.00	\$55.00	2.902	2,835.70	2,820.00	-0.11%
48	Walgreen Co.	\$14,376	\$18,500	5.2%	\$65.00	\$55.00	\$60.00	2.837	988.56	875.00	-2.41%
49	Wal-Mart Stores	\$70,749	\$76,025	1.4%	\$100.00	\$80.00	\$90.00	3.846	3,786.00	3,250.00	-3.01%
50	Waste Management	\$6,285	\$6,800	1.6%	\$50.00	\$40.00	\$45.00	2.941	486.12	445.00	-1.75%

(a) www.valueline.com (retrieved Jan. 28, 2011).

(b) Computed using the formula  $2^{*(1+5\text{-Yr. Change in Equity})/(2+5\text{ Yr. Change in Equity})}$ .

(c) Product of year-end "r" for 2014 and Adjustment Factor.

(d) Product of change in common shares outstanding and M/B Ratio.

(e) Computed as  $1 - B/M$  Ratio.

(f) Five-year rate of change.

(g) Average of High and Low expected market prices divided by 2013-15 BVPS.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**  
**DIRECT TESTIMONY**  
**OF**  
**STEVEN R. KEEN**

**July 29, 2011**

1 **Q. Please state your name, business address, and present occupation.**

2 A. My name is Steven R. Keen and my business address is 1221 West Idaho Street,  
3 Boise, Idaho. I am employed by Idaho Power Company ("Idaho Power" or  
4 "Company") as Vice President, Finance and Treasurer.

5 **Q. What is your educational background?**

6 A. I graduated with high honors in 1981 from Idaho State University, receiving a  
7 Bachelor of Business Administration degree in Accounting. I have also attended  
8 numerous seminars and conferences on accounting and finance issues related to the  
9 utility industry. I am a Certified Public Accountant licensed in the state of Idaho.

10 **Q. Please describe your business experience with Idaho Power.**

11 A. I joined Idaho Power in September 1982 in the Property Accounting Department. In  
12 March 1983, I transferred to the Tax Department as a Tax Accountant. From that  
13 time through December 1998, I advanced through various positions in the Tax  
14 Department, including Property Tax Representative, Tax Research Coordinator, and,  
15 finally, Corporate Tax Director. In January 1999, I became President of IDACORP  
16 Financial Services. In June of 2006, I accepted the position of Vice President and  
17 Treasurer of Idaho Power and IDACORP, Inc. ("IDACORP") and on June 1, 2010, I  
18 became Vice President, Finance and Treasurer of Idaho Power and IDACORP.

19 In the course of my duties with Idaho Power, I presented testimony in Idaho  
20 Power's last general rate case before the Public Utility Commission of Oregon  
21 ("Commission"), Docket No. UE 213, and the last two general rate cases before the  
22 Idaho Public Utilities Commission ("IPUC"), Case Nos. IPC-E-07-08 and IPC-E-08-  
23 10, respectively. In addition, I have presented tax testimony to the Internal Revenue  
24 Service as well as tax and/or capitalization rate testimony to the Departments of  
25 Revenue and Taxation for Idaho, Oregon, Wyoming, and Nevada.

26

1 **Q. What are your duties as Vice President, Finance and Treasurer of Idaho Power**  
2 **as they relate to this proceeding?**

3 A. I oversee the direct financial planning, procurement, and investment of funds for  
4 Idaho Power, as well as supervise corporate liquidity management. I also have  
5 oversight and responsibility for the Company's financial reporting, both internal and  
6 external, and its investor relations function.

7 My duties and responsibilities include various aspects of all the Company's  
8 financings and other financial matters. With respect to long-term financings, sale of  
9 bonds, and sale of equity, my duties include development of financial plans with  
10 senior officers, meeting with representatives of investment banking firms that are  
11 interested in underwriting Idaho Power securities, discussions with credit rating  
12 agencies, assisting in preparation of financial material (including Registration  
13 Statements filed with the Securities and Exchange Commission), representing the  
14 Company at informational meetings for investment banking firms, reviewing  
15 information relative to the Company's financings, and recommending disposition of  
16 net proceeds. With respect to short-term financings, my duties and responsibilities  
17 include negotiation of lines of credit with commercial banks and overseeing the sale  
18 of commercial paper.

19 **Q. Do your responsibilities include communicating with members of the financial**  
20 **community?**

21 A. Yes. I am in continuous contact with individuals representing investment and  
22 commercial banking firms, credit rating agencies, insurance companies, institutional  
23 investment firms, and other organizations interested in publicly traded securities, all  
24 of whom actively follow IDACORP and Idaho Power. Along with the Company's  
25 Chief Financial Officer and the Director of Investor Relations, my responsibilities  
26 include keeping these representatives of the financial community informed of the

1 Company's financial condition, arranging meetings with these individuals and Idaho  
2 Power's senior executive management, and visiting with financial representatives in  
3 their respective offices. Some of these members of the investment community have  
4 followed the electric utility industry for an extended period of time and have a great  
5 deal of expertise in the financial problems and prospects of utilities.

6 Through my continuous contact with the financial community and review of  
7 investment banking analytical reports and articles issued by these firms and the  
8 rating agencies, I am able to keep informed on trends, interest rates, financing costs,  
9 security ratings, and other financial developments in the public utility industry.

10 **Q. Are you a member of any professional societies or associations?**

11 A. Yes. I am a current member and past board president of the Idaho Society of  
12 Certified Public Accountants. I am a current member and past council member of  
13 the American Institute of Certified Public Accountants. I am a current member and  
14 past board chairman of the Associated Taxpayers of Idaho. I am the current board  
15 chairman of the Idaho Tax Foundation. I am a member of the Idaho Association for  
16 Financial Professionals. Also, in 2008, I was appointed by Idaho Governor Otter to  
17 the Board of Commissioners for the Idaho Housing and Finance Association.

18 In addition to the above activities, I attend numerous conferences and  
19 seminars of these and other utility professional groups, such as the Edison Electric  
20 Institute, on a regular basis. Through participation in these events, I gain additional  
21 information and insights into the financial developments affecting Idaho Power, as  
22 well as the electric utility industry.

23 **Q. What is the purpose of your testimony in this proceeding?**

24 A. My testimony addresses the following issues: (1) financial risk factors generally; (2)  
25 risk factors that are unique to Idaho Power which justify the Company's requested  
26 return on equity ("ROE") as the minimum acceptable ROE for Idaho Power; (3) the

1 use of a forecasted year-end 2011 capital structure; and (4) the embedded cost of  
2 long-term debt and the resultant overall cost of capital used to compute the  
3 Company's revenue requirement.

4 **Q. What exhibits are you sponsoring?**

5 A. I am sponsoring Exhibits 501-503.

6 **I. COST OF EQUITY POINT ESTIMATE**

7 **Q. What ROE is the Company requesting in this proceeding?**

8 A. The Company requests an ROE of 10.5 percent.

9 **Q. Is the Company's request consistent with the recommendations made by the  
10 Company's outside expert regarding the Company's cost of capital?**

11 A. Yes. The request is within the range suggested by Dr. Avera but at the low end of  
12 his "bare bones" recommended range. The Company believes that 10.5 percent is  
13 the minimum ROE necessary to allow Idaho Power to attract capital at reasonable  
14 rates in today's financial markets.

15 **Q. How did you arrive at your requested ROE?**

16 A. While I believe that the risks facing Idaho Power at this time justify an ROE in excess  
17 of 10.5 percent, I have taken into account the general economic conditions in Idaho  
18 Power's service area and have selected the lowest end of the recommended range.  
19 Idaho Power is sensitive to the burdens imposed upon its customers by the current  
20 economic conditions. Accordingly, Idaho Power has adopted a conservative  
21 approach in all areas of this rate filing. In that light, the Company is seeking an ROE  
22 at 10.5 percent, an amount which the Company believes strikes an appropriate  
23 balance between the minimum necessary ROE to continue attracting low-cost capital  
24 and the Company's desire to minimize rate impacts for its customers.

25 **Q. Did you consider other ROE decisions in the Oregon jurisdiction?**

26 A. Yes. Idaho Power is aware of the recent ROE of 10.125 percent that was set by



1 stipulation in Pacific Power's last Oregon rate case, UE 217. However, Pacific  
2 Power's situation can be distinguished from Idaho Power's, thus justifying a  
3 difference in authorized ROE.

4 **Q. Please discuss the differences between Pacific Power and Idaho Power that**  
5 **justify a difference a higher ROE for Idaho Power.**

6 A. Certainly. First, you must consider that Pacific Power's parent company, PacifiCorp,  
7 is a larger, multijurisdictional utility. It also carries a higher overall corporate credit  
8 rating than Idaho Power with Standard & Poor's Corporation ("S&P"), although  
9 Moody's Investors Services, Inc. ("Moody's") rates PacifiCorp and Idaho Power  
10 equally. S&P's April 30, 2011, ratings publication assigns PacifiCorp an A- corporate  
11 credit rating compared to Idaho Power's BBB. This is a full two step advantage for  
12 PacifiCorp and conveys that Idaho Power is viewed as having more risk. Second,  
13 the fact that PacifiCorp is owned by MidAmerican Energy Holdings Co., which is  
14 privately held and majority owned by Berkshire Hathaway (which carries an AA+  
15 corporate credit rating), was also pointed out in the Standard & Poor's document.  
16 Unlike PacifiCorp, Idaho Power does not have a stronger parent company to look to  
17 in times of financial distress. In fact, IDACORP's credit metrics are slightly lower  
18 than Idaho Power's.

19 Considering the differences in size and credit quality, there is certainly  
20 evidence to support Idaho Power's request for a higher ROE than was granted to  
21 Pacific Power. My recommended 10.5 percent ROE is justifiably higher than the  
22 Pacific Power decision and at the lower end of the range currently recommended by  
23 Dr. Avera.

24  
25  
26

1 **II. RISK FACTORS**

2 **Q. Could you briefly outline the risks confronting the Company that form the**  
3 **basis for your recommendation of a 10.5 percent ROE as the minimum**  
4 **acceptable authorized return?**

5 A. Yes. I will summarize them here and discuss them in greater detail later in my  
6 testimony. I believe that, at a minimum, a 10.5 percent ROE is required to properly  
7 account for the risks confronting Idaho Power for the following reasons:

8 1. The general decline in the Company's credit quality and the  
9 resulting impact on the Company's ability to meet ongoing capital funding  
10 requirements;

11 2. The Company's difficulty in earning an actual return on equity  
12 on a sustained basis that is near the Company's authorized rate of return;

13 3. The perceived risk in the financial community associated with  
14 the variability of the Company's hydroelectric generating base and risks associated  
15 with variances in the weather;

16 4. The costs and risks related to the renewal of federal licenses  
17 for the Company's hydroelectric projects, primarily the Hells Canyon Complex, which  
18 provides on average 40 percent of the Company's total generating capacity;

19 5. The impact of large and growing expenditures incurred  
20 pursuant to the Public Utility Regulatory Policies Act of 1978 ("PURPA");

21 6. The difficulty of the Company to recover on a timely basis the  
22 significant capital investment required for present and growing electrical  
23 requirements and service reliability for its customers; and

24 7. The Company's small size and concentrated regulatory risk  
25 (i.e., 95 percent of its business is in Idaho).

1 **Q. Are some of these risk conditions the same risk conditions that have been**  
2 **raised in past Idaho Power rate proceedings?**

3 A. Yes. The Company has faced most of these risks for many years. However, their  
4 impacts and significance can change (and have changed) and I attempt to address  
5 those implications here.

6 **Q. Are there other risks, less specific to Idaho Power that also influence your**  
7 **recommendation?**

8 A. Yes. There are general financial risks such as increased volatility in the financial  
9 markets and what I view as a heightened sensitivity to risk exposure that has evolved  
10 since the United States housing market began experiencing problems in 2007, and  
11 which was magnified by the very significant disruption in the financial markets that  
12 occurred in 2008. There are also industry specific risks, such as unknown costs  
13 relative to carbon emissions, an industry-wide need for infrastructure improvements,  
14 and increased capital investment, as well as inflationary pressures that increase  
15 costs of both operating expenses and capital outlays. While the financial disruption  
16 has been somewhat mitigated, particularly in relation to corporate finance in the past  
17 year, the improvement has been met with interest rate uncertainty and a growing fear  
18 that future borrowing costs could rise dramatically. Recently, the Federal Reserve  
19 has indicated that it may be less active in its effort to keep interest rates low, which  
20 creates expectations for rising debt costs in the near future. All of these factors  
21 combine to create a challenging environment in which the Company must compete  
22 with others in the electric utility industry, for both resources and capital, to serve the  
23 needs of its customers and shareowners. While I do not intend to elaborate further  
24 on more general risks, they are factors worthy of note that point to increased risks for  
25 the Company.

26

1       **A.     Declining Credit Ratings.**

2       **Q.     What is the status of Idaho Power's credit ratings?**

3       A.     Idaho Power's credit ratings as of June 30, 2011, are as follows:

4

	<b>Standard &amp; Poor's</b>	<b>Moody's</b>
5     Corporate Credit Rating/ 6     Issuer Rating	BBB	Baa 1
7     Senior Secured Debt	A-	A2
8     Senior Unsecured Debt	BBB	Baa 1
9     Short-Term Tax-Exempt Debt	BBB/A-2	Baa 1
10    Commercial Paper	A-2	P-2
11    Credit Facility	None	Baa 1
12    Rating Outlook	Stable	Stable

11       **Q.     S&P downgraded the Company's credit rating in January of 2008. What**  
12       **prompted this action?**

13       A.     S&P lowered the corporate credit ratings for both Idaho Power and IDACORP from  
14       BBB+ to BBB, citing cash flow concerns; the then-current proposed general rate  
15       settlement in Idaho, Case No. IPC-E-07-08; and specifically mentioned the impacts  
16       of declining load growth. S&P's research update on January 31, 2008, stated:

17               The rating action was driven by a gradual deterioration of  
18               cash flow coverage and last week's proposed general rate  
19               case settlement, which does not sufficiently address long-  
20               term ratemaking issues tied to rising costs and load growth  
21               pressures. Over time, average credit metrics have  
22               deteriorated, and the company has been unable to  
23               stabilize returns and cash flow with existing rate  
24               mechanisms. The proposed settlement calls for an  
25               average 5.2 percent rate increase but does not settle some  
26               important, policy-related issues in the case, such as the  
               use of a forecasted test year or the appropriate level of the  
               load growth adjustment credit.

24       **Q.     Have there been other recent rating agency actions?**

25       A.     Yes. In the intervening time between the S&P action and this filing, both Fitch  
26       Ratings and Moody's changed their ratings outlooks for both Idaho Power and

1 IDACORP from “stable” to “negative” in 2008 then back to “stable” in 2010. On July  
2 8, 2009, Moody’s reaffirmed its negative outlook on Idaho Power’s corporate credit  
3 rating and commented regarding their continued concern:

4 Key concerns continue to focus on hydro conditions given  
5 the persistence of drought conditions during the past  
6 decade and higher than historical average planned capital  
7 spending despite recent steps to curtail or delay certain  
8 projects. Moreover, while key credit metrics are beginning  
9 to trend upward, further strengthening of cash flow and  
10 continued conservative financing strategies are necessary  
11 to allay our concerns and improve the company’s weak  
12 position within the Baa1 rating category. To accomplish  
13 this, continued support from state regulators in anticipated  
14 future general rate cases will also remain an important  
15 rating driver.

16 On March 30, 2010, Moody’s revised its outlook for both Idaho Power and  
17 IDACORP back to stable with the following comments in a press release:

18 The change to a stable rating outlook for IPC reflects the  
19 company’s strengthened financial and operating profile  
20 resulting from a series of regulatory decisions during 2009  
21 and 2010, which evidence a strong support for credit  
22 quality.

23 On the same date, in its updated credit opinion for Idaho Power, Moody’s  
24 discussed the following regulatory actions in explaining how a supportive regulatory  
25 environment bodes well for credit quality:

26 Favorable regulatory practices in Idaho, which is IPC’s  
principal jurisdiction, include 1) a relatively swift seven  
month statutory period governing rate cases; 2) frequent  
decisions based on settlements instead of litigated  
proceedings; 3) reasonable allowed returns on equity; 4)  
reliance on an assortment of cost tracking and adjustment  
mechanisms, periodic utilization of single-issue rate cases  
and partially forecast test years to avoid undue rate lag;  
and 5) pre-approval of future rate treatment for certain  
capital investments allowed under state law.

27 **Q. Does this indicate that credit ratings of Idaho Power are now on an upward**  
28 **path?**

1 A. No. I do believe recent regulatory actions combined with more positive actual  
2 financial results have stopped the decline in Idaho Power's credit ratings. However, I  
3 also believe Idaho Power will need to show sustained improved financial results  
4 before movement in a positive direction occurs. In the Moody's credit opinion on  
5 March 31, 2010, it offered the following comments on what would be required to  
6 move the Company's credit ratings upward:

7 A rating upgrade is unlikely in the near-to-medium term;  
8 however, IPC's rating outlook could turn to positive if the  
9 benefits from recent rate relief carry through and there are  
no material changes in the degree of regulatory  
supportiveness in future rate filings.

10 In regard to what could move Idaho Power's ratings down, Moody's  
11 commented:

12 The rating would likely be revised downward if the recently  
13 improved regulatory support wanes or if conservative  
14 funding strategies are not adhered to, thereby contributing  
to undue pressure on metrics.

15 Moody's also offered specific comments regarding cash flow metrics,  
16 indicating that sustainable levels of improvement would be needed to support a  
17 positive outlook and that poor metrics for an extended period of time could result in a  
18 ratings downgrade.

19 **Q. Did S&P's offer any similar comments?**

20 A. Yes. In S&P's May 20, 2011, research report, the agency noted the following in its  
21 credit outlook:

22 The stable outlook reflects our expectation of sufficient  
23 operating cash flows to support financial metrics that are  
24 adequate for the ratings, the ability to internally fund a  
25 significant portion of capital expenditures, and adequate  
26 management of regulatory relationships. We could lower  
the ratings if the company does not carefully manage costs  
and investments to ensure full recovery and the  
maintenance of credit metrics, especially in light of a  
weakening economy. We could raise the ratings if the

1 company is able to consistently achieve significantly  
2 stronger financial metrics, including adjusted FFO to debt  
3 of 20% or more and adjusted debt to capital of 50% or  
4 less, in addition to solidly managing regulatory  
relationships, but higher ratings are unlikely in the near  
term.

5 **Q. Given the views of the rating agencies, do you believe that the current credit**  
6 **ratings of Idaho Power are adequate?**

7 A. Yes. Idaho Power is able to raise capital in today's markets with its current ratings.  
8 However, new debt/bond issues are at a higher cost than if Idaho Power's credit  
9 ratings were higher (i.e., the higher the credit rating, the lower the debt financing  
10 cost).

11 Moreover, with Idaho Power's current credit rating level, an unexpected  
12 downgrade in credit could have significant financial impacts. Should an unexpected  
13 or unforeseen event cause Idaho Power's short-term credit ratings to be lowered, it  
14 could become extremely difficult for the Company to issue commercial paper. The  
15 commercial paper market is very competitive, and a reduction to the Company's  
16 short-term credit rating would make its commercial paper illiquid in the market and  
17 more expensive to issue. This would significantly limit the options Idaho Power has  
18 available to meet ongoing cash requirements, such as funding capital improvements  
19 and paying for power supply costs in excess of those recovered in base rates, and  
20 would likely result in higher interest costs that ultimately flow through to the  
21 Company's customers. The Company's annual and quarterly financial statement  
22 disclosures list risk factors which identify potential events that could have an impact  
23 on the Company. While the list is extensive, it may not identify every possible risk  
24 that could occur. These unexpected or unforeseen risks have the potential to cause  
25 greater financial impact when a company is closer to the bottom of what is  
26 considered "investment grade."

1 **Q. What is the lowest rating that is considered investment grade?**

2 A. For S&P that rating is BBB-. Idaho Power's corporate credit rating is currently one  
3 step above that bottom rating. Its senior unsecured debt rating is at BBB and its  
4 secured debt rating is currently at A-. A significant concern for me, as the officer  
5 primarily responsible for providing the Company's capital, is how close Idaho Power  
6 is to the bottom of investment grade status.

7 **Q. Can you illustrate the recent trend in ratings for the Company and show the**  
8 **relationship to the level that is considered investment grade?**

9 A. Yes. I have sponsored Exhibit 501, which shows the downward trend to Company  
10 ratings and shows how close the current ratings are to the bottom level for  
11 investment grade companies.

12 **B. Reasonable Actual Results.**

13 **Q. Do you have an opinion as to why the rating agencies have taken their**  
14 **previous actions to reduce Idaho Power's credit ratings?**

15 A. Yes, I do. I believe the single largest contributor is the fact that the Company's  
16 actual results have been significantly and consistently below its authorized rate of  
17 return.

18 **Q. Has the Company been able to earn its allowed return on equity in its Oregon**  
19 **jurisdiction in recent years?**

20 A. No. The Company has not been able to earn its allowed ROE on a system-wide  
21 basis, and the ROE in its Oregon jurisdiction has been even lower. The system-wide  
22 actual ROE was 7.2 percent in 2004 and 7.7 percent in 2005. In 2006, Idaho  
23 Power's actual ROE was just over 9 percent because of excellent hydro conditions.  
24 In the next three years, Idaho Power earned 6.9 percent, 7.9 percent, and 9.6  
25 percent ROE on a total system-wide basis. In 2010, the total system ROE was 10  
26



1 percent; however, it would have only been 7.9 percent if not for a one-time tax  
2 benefit, which I will discuss later in my testimony.

3 For the Oregon jurisdiction during the years 2005 to 2009, Idaho Power's  
4 authorized ROE in Oregon was 10 percent. The Company's Oregon jurisdiction  
5 normalized ROE ranged from a high of 4.30 percent in 2005 to a low of -3.58 percent  
6 in 2008. In 2010, the OPUC revised Idaho Power's Oregon authorized ROE to  
7 10.175 percent but its normalized Oregon ROE was 6.32 percent (without the one-  
8 time tax benefit).

9 The gap between allowed and actual ROE is quite evident when placed on a  
10 graph, as depicted in Mr. Darrel Anderson's Exhibit 201.

11 **Q. How is this continual earnings short-fall perceived in the financial community?**

12 A. I believe that the financial community and the rating agencies are both focused on  
13 and concerned about this short-fall. Recent ratings actions are looking directly at the  
14 actual results of Idaho Power's regulatory efforts. Both the investment community  
15 and the ratings agencies expect actual rates of return to be near authorized levels, or  
16 at least to occur at or above authorized levels as often as they fall below them. They  
17 are both also looking for more consistency in cash flows.

18 **Q. What are the impacts if ratings agencies and financial markets are continually  
19 disappointed with actual results?**

20 A. The impact is that the Company and its customers eventually incur higher costs of  
21 capital. Lower ratings actions contribute to higher costs of debt while dissatisfaction  
22 in the financial markets can mean lower stock valuation, which leads to greater  
23 numbers of equity share issuances, ultimately driving total cost of capital higher.

24 **Q. Did the Company experience any one-time benefits that increased earnings in  
25 2010?**

26

1 A. Yes. In 2010, the Company recognized a one-time tax benefit for the tax method  
2 change related to capitalized repair costs ("Repairs"). A one-time tax benefit of  
3 \$44.5 million was recorded relating to 2009 and prior tax years. In addition, an \$11.7  
4 million tax benefit for the estimated annual deduction was recorded for the 2010  
5 year. This issue remained in dispute with the Internal Revenue Service during 2010;  
6 thus, a liability for uncertain tax positions was also accrued relating to these two  
7 amounts totaling \$14.7 million. With \$56.2 million of positive income impacts netted  
8 with the uncertain tax position liability of \$14.7 million, 2010 results benefited by  
9 \$41.5 million of additional income.

10 **Q. Will there be ongoing benefits for customers from the Repairs method change**  
11 **that could benefit the Company in future years?**

12 A. Yes. There is an ongoing tax benefit associated with the Repairs deduction; it will  
13 provide some benefit to 2011 and the full value of that benefit is included in this rate  
14 filing as a decrease to expense. On a total system basis, this benefit effectively  
15 lowers the annual request by approximately \$8 million more than Idaho Power's prior  
16 Repairs deduction methodology would have. In addition, the Company will continue  
17 to have the ability to use the Repairs deduction depending upon the amount of  
18 investment the Company makes in future qualified repair items.

19 **Q. You mentioned that a liability for uncertain tax positions was established. How**  
20 **is that handled in the future?**

21 A. The issues surrounding the Repairs method change were effectively settled with the  
22 Internal Revenue Service in April of 2011. The result of that settlement utilized all  
23 but approximately \$3 million of the liability. In other words, approximately \$12 million  
24 of concessions were made, lowering the tax benefit of the Repairs method change,  
25 in order to reach agreement. The remaining \$3 million of benefit is expected to be  
26 recognized in the second quarter of 2011.

1 **Q. Are there any potential one-time adjustments that could benefit customers in**  
2 **2011?**

3 A. Yes. An additional tax method change relating to the 2009 income tax return  
4 occurred in 2010, the income tax benefits of which were offset by recording a liability  
5 for uncertain tax positions equal to 100 percent of the benefit. This method change  
6 relates to Idaho Power's method of capitalizing overhead costs for tax purposes  
7 ("UNICAP"). The method change for UNICAP was not a taxpayer initiated method  
8 change but was based on a methodology derived by the Internal Revenue Service.  
9 The methodology was new, and while benefiting the Company with additional current  
10 tax benefits, it created results similar to a method change proposed by the Company  
11 in previous years that was later contested and significantly reduced by the Internal  
12 Revenue Service. The size of the change was also of such a magnitude that it  
13 elevated Idaho Power's 2009 refund claim to a level that required approval by the  
14 U.S. Congress's Joint Committee on Taxation ("Joint Committee"). Given all of these  
15 facts, the Company established a liability for uncertain tax positions, which netted  
16 against the original claim, bringing the 2010 net tax benefit to \$0.

17 At year end 2010, the gross UNICAP method change impact was  
18 approximately \$60 million. As time passes, this benefit at inception becomes smaller  
19 as depreciation continues to be claimed on the property additions to which the  
20 overheads related. The system-wide amount at March 31, 2011, was \$58 million;  
21 however, additional benefits for new deductions relating to ongoing years will also be  
22 recorded if the issue is ultimately approved by the Joint Committee.

23 In April 2011, the UNICAP issue was submitted along with the rest of the  
24 2009 tax return to the Joint Committee for review. The Company believes  
25 submission at this early date enhances the possibility for resolution in 2011. Idaho  
26

1 Power cannot predict the outcome, but if approval is received, a net benefit in excess  
2 of \$60 million would be recognized in 2011.

3 **Q. Are the ongoing benefits from the UNICAP method change included in this**  
4 **case similar to the Repairs method change?**

5 A. At this time, they are not included because the Joint Committee has not approved  
6 the Company's 2009 refund. However, a UNICAP deduction consistent with Idaho  
7 Power's prior method has been included, thus providing some rate benefit. If  
8 approval is received from the Joint Committee, it would be appropriate for the  
9 increased annual benefits to be included in a general rate case.

10 **Q. Are there other tax benefits that you are aware of that could benefit the current**  
11 **or future periods?**

12 A. At this time, there are no other anticipated or pending method changes that would  
13 deliver significant benefits to either 2011 or future years. The Repairs and UNICAP  
14 items are unique. It is very unusual to have the impacts from two such adjustments  
15 so close together in time.

16 **Q. Does bonus depreciation provide similar benefits to customers the way the**  
17 **UNICAP and Repairs items do?**

18 A. Not necessarily. Bonus depreciation was granted to a broad range of taxpayers,  
19 including Idaho Power, and while providing cash benefits to the Company, it does not  
20 have income benefits such as either the Repairs or UNICAP methods. Bonus  
21 depreciation has been utilized by the federal government, off and on, for the last  
22 decade as an economic stimulus measure. The Company has typically taken  
23 advantage of the deduction when offered. Cash flow will be benefited in 2011 by the  
24 bonus depreciation deduction. Current tax expense will be lower with an offsetting  
25 deferred tax that leaves the income impact at \$0. The deferred taxes will add to the  
26 balance of accumulated deferred income taxes at year end. The accumulated

1 deferred income tax balances, for items included in rate base, are a net reduction to  
2 rate base, thus benefiting customers. While bonus depreciation is available in 2011  
3 and 2012, there is no income or return on equity support associated with this  
4 deduction.

5 **Q. How do the ratings agencies view the impacts of bonus depreciation?**

6 A. S&P issued an update specifically on bonus depreciation on May 9, 2011. In that  
7 report, S&P generally concludes that while bonus depreciation is good for cash flow,  
8 it does not have the same positive impact on credit ratings. S&P makes it point  
9 strongly with two separate document headings. The first heading reads: "Bonus  
10 Depreciation Will Improve Cash Flow . . . ." The second heading continues the  
11 thought: ". . . But Not Credit Quality." Under the first heading, S&P points out that  
12 bonus depreciation will increase cash flow as well as cash flow metrics. Under the  
13 second heading, S&P points out, "However, while we view bonus depreciation as  
14 real cash that a company has at its disposal, we minimize its importance in our  
15 fundamental credit analysis because it is not sustainable." In Idaho Power's  
16 discussions with both Moody's and Standard & Poor's, the agencies stated they  
17 found it positive that the Company planned to utilize the additional cash that results  
18 from bonus depreciation to minimize existing and future capital funding needs.

19 **Q. Looking ahead, what does Idaho Power believe is the broader implication of**  
20 **the previously discussed one-time tax benefit?**

21 A. The Company has delivered better financial results in recent years, although still  
22 below its authorized rates of return, primarily due to the benefits of one-time tax  
23 initiatives and earnings support from the Company's previous rate case settlement  
24 and stipulation in the Idaho jurisdiction (IPUC Case No. IPC-E-09-30, Order No.  
25 30978). As seen in the prior comments from the ratings agencies, the improved  
26 actual results combined with a supportive regulatory environment have been viewed

1 positively. Both the Repairs and UNICAP method changes provide the majority of  
2 their value in a single period. They may lift a single year's performance but they do  
3 not provide the sustained, ongoing level of support needed by Idaho Power to  
4 maintain or enhance its credit quality. Returning to one of my earlier comments, the  
5 Company's earnings in 2010 look quite reasonable with a 10 percent actual total  
6 system ROE; it is far better than the years immediately prior. However, when the  
7 benefits of the Repairs method change are removed for 2010, the actual total system  
8 ROE is 7.9 percent. It is this unassisted level of return that requires additional  
9 regulatory support and calls for at least the very conservative ROE of 10.5 percent  
10 that Idaho Power has requested in this filing.

11 **C. Hydro and Weather Variability.**

12 **Q. Please describe the risks specific to Idaho Power's predominately**  
13 **hydroelectric generating base.**

14 A. Idaho Power and its customers have historically enjoyed the benefits of a  
15 hydroelectric-based utility, normally deriving more than half of its generation from low  
16 cost hydro electricity. The availability of hydroelectric power depends on the amount  
17 of snowpack in the mountains upstream of Idaho Power's hydroelectric facilities,  
18 reservoir storage, springtime snowpack run-off, rainfall, temperature, and other  
19 weather variability, combined with other stream flow management considerations.  
20 During low water years, when stream flows into Idaho Power's hydroelectric projects  
21 are reduced, Idaho Power's hydroelectric generation is reduced. Extreme  
22 temperatures increase demand for power by customers, who use electricity for  
23 cooling and heating, and moderate temperatures decrease demand for power.  
24 Precipitation, or the lack thereof, also directly affects the Company's irrigation load,  
25 which represents a substantial portion of total system load. Weather and hydro  
26 production are inextricably linked. Reduced hydroelectric generation resulting from

1 below normal water flows requires the Company to use more expensive thermal  
2 generation and/or purchased power to meet the electrical needs of its customers.

3 **Q. Does the Company face any other water or weather-related risks that you**  
4 **would like to comment on?**

5 A. Yes. Comments from credit rating agencies and equity analysts have expressed  
6 concern about the potential impacts from aquifer recharge and water rights. The  
7 Company's reliance on hydro generation in general has come under scrutiny with  
8 recent history delivering so many below-normal water years in the Company's  
9 region. While it is difficult to quantify potential exposures, the heightened level of  
10 discussions and disagreements regarding water related issues have increased the  
11 Company's risk profile in the financial community.

12 **Q. Has anyone in the financial community attempted to evaluate the risks to the**  
13 **Company posed by its dependence on hydro generation?**

14 A. Yes. While all of the rating agencies and many in the equity analyst community have  
15 commented on the significant level of risk the Company faces in regard to its high  
16 reliance on hydro power, S&P actually reviewed the hydro issue specifically for  
17 Northwest utilities. On January 28, 2008, S&P issued a report titled, "Pacific  
18 Northwest Hydrology and Its Impact on Investor-Owned Utilities' Credit Quality."  
19 This report took an in-depth look at hydro implications for investor-owned utilities in  
20 the Northwest. Regarding Idaho Power, the January 2008 S&P report stated that,  
21 "Idaho Power's regulatory mechanisms are strong, relative to the other companies in  
22 our survey, but not strong enough to overcome significant exposure to the variable  
23 flows of the Snake River." The report went on to indicate the financial implications to  
24 the Company related to this and other factors as described below:

25 Despite having both a PCA and an update process, the  
26 mechanisms have not been able to fully insulate the  
company from the highly variable and generally low flow

1 conditions that have persisted on the Snake River for the  
2 greater part of the past decade. Idaho Power's financial  
3 performance has been also hampered by a load growth  
4 adjustment mechanism that has resulted in a cash loss on  
5 new customers, and regulatory lag due to the use of a  
6 historical test year for the non-fuel component of rates.

7 **Q. Do the Company's established mechanisms for handling variations in power  
8 supply costs remove this weather and water risk?**

9 A. To a large extent, yes. However, because the established mechanisms do not  
10 insulate the Company from the effects of 100 percent of all power cost variations,  
11 larger variations translate to more volatility for financial results. This higher volatility  
12 is viewed as elevated risk by the financial community.

13 **D. Relicensing the Hells Canyon Complex.**

14 **Q. Please describe the risks associated with the renewal of federal licenses for  
15 the Company's hydroelectric projects.**

16 A. Idaho Power is the only investor-owned electric utility in the United States that, under  
17 normal water conditions, derives as much as 55 percent of its Company-owned total  
18 system generation from hydro generating facilities. With such a large percentage of  
19 the Company's generation resources reliant on hydro facilities, a failure to  
20 successfully renew the federal licenses of these facilities could have a dramatic  
21 financial impact on the Company and the prices its consumers pay for electricity. For  
22 this reason, the Company has committed to expend significant financial and human  
23 resources to obtain new Federal Energy Regulatory Commission ("FERC") licenses  
24 for its hydro generating capacity.

25 **Q. What are the financial risks associated with the Company's efforts to relicense  
26 its hydro generating facilities?**

A. Once a relicense application is filed, the utility has no idea as to how long it will be  
before a final decision is issued by the FERC. This uncertainty, combined with the



1 potential loss of generation capability due to operational requirements, and the  
2 magnitude of the financial impact of unknown Protection, Mitigation, and  
3 Enhancement (“PM&E”) costs create financial risks for the Company.

4 **Q. Are there other hydro relicensing-based financial risks considered by the**  
5 **investment community?**

6 A. Yes. For any particular generating facility, the worst possible outcome would be the  
7 loss of the license to a competing party. Along with the uncertainty as to the  
8 eventual receipt of licenses and the costs involved in preparing for the license  
9 applications, costs of PM&E related to these projects are also difficult to quantify.  
10 The potential financial magnitude of these PM&E costs and their effect on the  
11 Company’s low-cost hydro generation resources threaten the financial stability of a  
12 company the size of Idaho Power and the ultimate rates it must charge its  
13 customers. These amounts will vary among facilities; however, in all cases, they can  
14 be significant due to lost generation capacity, generation at a higher cost, and the  
15 decreased ability of the Company to time and control water releases.

16 If the Company cannot generate when it is most advantageous for the  
17 system, then some of the economic value of the generation will be lost even if the  
18 amount of total generation does not change. In addition to the hydro relicensing risk,  
19 the Company continually faces significant capital, operating, and other costs relating  
20 to compliance with current environmental statutes, rules, and regulations. These  
21 costs may be even higher in the future as a result of, among other factors, changes  
22 in legislation and enforcement policies and the potential additional requirements  
23 imposed in connection with the relicensing of the Company’s hydroelectric projects.

24 **Q. Please address the risk specifically associated with the Company’s relicensing**  
25 **effort before the FERC for the Hells Canyon generating facilities.**

26

1 A. Idaho Power's Hells Canyon generating facilities, comprised of Hells Canyon,  
2 Oxbow, and Brownlee dams, make up 67 percent of the Company's hydro  
3 generation capacity and 40 percent of its total generation capacity. The Hells  
4 Canyon license application was filed in July 2003 and accepted by the FERC for  
5 filing in December 2003. The FERC process moves at a slow and deliberate pace  
6 due to the large number of interested parties involved in evaluating the application.  
7 Therefore, the timing of the issuance of a new Hells Canyon facilities license remains  
8 uncertain. Historically, the FERC has given the Company an annual license renewal  
9 (under the existing old license) until the formal new license is issued. It is difficult to  
10 predict the ultimate financial impact of the relicense until the new FERC license is  
11 issued and all of the relicense conditions are known.

12 **Q. Please comment on the relicensing efforts that the Company has already**  
13 **undertaken.**

14 A. As part of the FERC relicensing regulations and pursuant to the Federal Power Act,  
15 the Company is required to conduct numerous studies and evaluations concerning  
16 botanical, land management, hydraulic, flow modeling, sedimentary, water quality,  
17 aquatic, recreation, cultural resource, and fish and wildlife issues.

18 **Q. How does the Company account for the cost of these projects?**

19 A. Idaho Power books the project costs to Construction Work in Progress ("CWIP")  
20 because they are part of the relicensing process pursuant to FERC and state  
21 accounting requirements. While the costs are included in CWIP, the Company  
22 accrues a capitalization charge commonly referred to as an Allowance for Funds  
23 Used during Construction ("AFUDC"). The AFUDC is a non-cash item that  
24 represents the cost of related debt and equity financing. The component for AFUDC  
25 attributable to borrowed funds is included as a reduction to interest expense, while  
26

1 the equity component is included in other income. The total amount of AFUDC is  
2 charged to CWIP.

3 **Q. What were the accumulated costs related to the Hells Canyon relicensing at**  
4 **December 31, 2010?**

5 A. The total amount the Company had accrued in CWIP was \$130.2 million related to  
6 Hells Canyon relicensing. Included in this amount was \$50.6 million in AFUDC.

7 **Q. Is the Company currently recovering any of these costs from its Oregon**  
8 **customers?**

9 A. No.

10 **Q. What will occur when the Company receives a new license for the Hells**  
11 **Canyon facilities?**

12 A. The amounts in CWIP will be transferred to plant in service, the accumulation of  
13 AFUDC will cease, and amortization of the investment will begin. Until this  
14 investment is included in base rates, the lack of AFUDC and the increase in  
15 amortization expense will cause the Company's earnings to decline. The decline  
16 would be material given that the December 31, 2010 CWIP balance for Hells Canyon  
17 relicensing was \$130 million and continues to increase. Because this is a relicense  
18 of an existing hydro facility, there will be no increase (and potentially a decrease due  
19 to operational changes) in the generation of power and thus no increase in sales  
20 revenues. The investment community sees this as a risk that confronts the  
21 Company which can be summarized as follows: Upon receipt of a relicense, (1) the  
22 Company has an investment (increase in base rates) that has not yet been approved  
23 for inclusion in base rates, (2) earnings will go down because AFUDC is no longer  
24 being accrued and amortization expense begins, and (3) no additional sales  
25 revenues (same plant but new license) will result. If the completion of relicensing is  
26 not aligned perfectly with the allowance of new effective rates that recognize the

1 transfer of previously deferred relicensing costs into rate base, the Company will be  
2 financially harmed. For the period of time the new rate base is under review by the  
3 Commission, the Company will not earn a return on its investment nor recover any  
4 recognized amortization expense. This potential regulatory lag combined with any  
5 additional potential for some disallowance is a significant risk factor based upon the  
6 size of the investment.

7 **E. Risk Associated with Purchase of PURPA Energy.**

8 **Q. Does the regulatory treatment of the Company's energy purchases from**  
9 **Qualified Facilities ("QF") increase the financial risk to Idaho Power?**

10 A. Yes. It is important to note that in a very short time frame, the Company has  
11 experienced unprecedented growth in the total amount of generation and financial  
12 commitments as the result of a high number of agreements it has entered into with  
13 PURPA projects, many of which are wind generators. The regulatory treatment of  
14 QF expenditures provides for a one-for-one recovery of dollars expended, but does  
15 not provide for any return to compensate the Company for this activity. The  
16 Company is, in effect, buying and selling energy pursuant to a legal mandate without  
17 any compensation for providing this service. Simplistically, this regulatory treatment  
18 is similar to requiring a person operating a business to buy a product at the same  
19 price it must be sold. The mere dollar-for-dollar recovery of QF expenditures, with no  
20 return for the use of the Company's general and administrative resources, balance  
21 sheet, and liquidity in managing QF programs, is viewed as a significant risk by the  
22 rating agencies. The rating agencies are not making a judgment related to the  
23 appropriateness of QF energy purchase programs, but merely pointing out the cost  
24 of the financial risk(s) arising from a QF transaction, and that this risk should be  
25 reflected in a higher return on equity to credit the Company for its QF contracts.  
26

1 **Q. Do the rating agencies recognize the financial costs of QF-related**  
2 **transactions?**

3 A. Yes. Like other electric utilities, when the Company adds to its rate base, it must use  
4 some portion of shareholder equity to fund the investment. The Company must  
5 maintain its proportion of equity to debt above a certain level as it continues this  
6 investment process. If it does not, the debt level increases and the Company will  
7 face the threat of a ratings downgrade. Conversely, when the Company enters into a  
8 QF contract for purchased power, an obligation not reflected in its financial  
9 statements, an increase in equity is needed to maintain credit quality. Unless an  
10 equity component is provided to offset the debt-like obligation of long-term QF  
11 purchase power contracts, the Company faces off-balance sheet financial risk. For  
12 financial commitments that do not appear on the balance sheet, analysts at S&P  
13 impute the debt and interest equivalents on the financial statements of the Company  
14 to achieve a more accurate picture of the risk associated with the investment and the  
15 Company's related commitment. The added equity needed to offset this imputed  
16 debt and interest represents the effect that long-term purchased power commitments  
17 have on the cost of capital. Any increase in the long-term obligation of a utility  
18 related to its capacity and energy resources will have to be backed by an appropriate  
19 amount of equity in the eyes of the ratings agencies.

20 In reviewing its evaluation of the credit implications of QF-related  
21 expenditures, in May of 2003, as stated below, S&P noted that such agreements are  
22 "debt-like in nature" and that the increased financial risk must be considered in  
23 evaluating a utility's credit risks.

24 Standard & Poor's Ratings Services views electric utility  
25 purchased-power agreements (PPA) as debt-like in nature,  
26 and has historically capitalized these obligations on a  
sliding scale known as a 'risk spectrum.' Standard &  
Poor's applies a 0 percent to 100 percent 'risk factor' to the

1 net present value (NPV) of the PPA capacity payments,  
2 and designates this amount as the debt equivalent.

3 \* \* \*

4 Standard & Poor's evaluates the benefits and risks of  
5 purchased power by adjusting a purchasing utility's  
6 reported financial statements to allow for more meaningful  
7 comparisons with utilities that build generation. Utilities  
8 that build typically finance construction with a mix of debt  
9 and equity. A utility that leases a power plant has entered  
10 into a debt transaction for that facility; a capital lease  
11 appears on the utility's balance sheet as debt. A PPA is a  
12 similar fixed commitment. When a utility enters into a long-  
13 term PPA with a fixed-cost component, it takes on financial  
14 risk. Furthermore, utilities are typically not financially  
15 compensated for the risks they assume in purchasing  
16 power, as purchased power is usually recovered dollar-for-  
17 dollar as an operating expense.

18 **Q. Is the Company proposing to be compensated for QF energy it purchases in  
19 this docket?**

20 A. No, not directly. However, it is important that the Commission acknowledge the risks  
21 posed by the Company's PURPA contract obligations as part of determining an  
22 appropriate ROE for the Company.

23 **F. Enhancements and Reliability.**

24 **Q. Please describe the risks relative to the Company's ability to recover  
25 significant capital investment to fulfill its electrical requirements.**

26 A. As the Company's generation and transmission systems age and customer electrical  
requirements increase, additional investment is required to maintain reliability  
standards and to meet the additional requirements on its electrical infrastructure.  
The Company's year-end 2010 Form 10-K reports a construction budget of between  
\$320 to \$330 million in 2011, and between \$450 million to \$470 million of new  
construction expenditures over the two-year period of 2012 through 2013.  
Construction investments of this magnitude introduce two elements of risk. First,  
there is a risk that the Company may not be able to attract the required capital and,

1 second, the recovery of these investments is on a deferred basis and subject to the  
2 regulatory process.

3 **Q. Has growth slowed substantially with the recent recession?**

4 A. Growth has slowed but it has not halted. That said, the Company is facing significant  
5 demands associated with the need to maintain a safe, reliable system that satisfies  
6 federal and state compliance regulations, reliability requirements, and security  
7 mandates. And, as described in greater detail in Mr. Anderson's testimony, these  
8 demands impose a financial burden to the Company. The Company still bears  
9 significant risk meeting its obligation to safely and reliably serve customers and  
10 continues to feel the pressure to raise large amounts of capital requirements.  
11 Additionally, efforts at the national level to reshape energy policy may place new  
12 upward pressure on spending. New federal energy policies are constantly evolving  
13 and will most likely bring additional spending requirements to meet renewable  
14 portfolio standards and to comply with expected carbon reducing efforts.

15 **G. Company Size and Geographic Concentration.**

16 **Q. Does IDACORP's size have an impact on investor's perceived level of risk?**

17 A. Yes, IDACORP's relatively small market capitalization compared to its peers is a  
18 factor that makes IDACORP riskier than the average electric utility holding company.  
19 IDACORP's \$1.8 billion market capitalization is much smaller than the \$7.3 billion  
20 dollar average market cap of the electric utilities used by Dr. Avera to estimate the  
21 range of acceptable ROEs.<sup>1</sup> There is well-documented evidence that investors in  
22 smaller companies expect higher rates of return than larger companies, but also face  
23 higher risk.<sup>2</sup> Idaho Power does not have a corporate parent with a large balance  
24

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25 <sup>1</sup> As of April 26, 2011, [www.yahoo.com/finance](http://www.yahoo.com/finance).

26 <sup>2</sup> See Chapter 7 "Firm Size and Return" of *Ibbotson SBBi 2011 Classic Yearbook*.

1 sheet and strong credit ratings to rely on during times of financial stress. Also, the  
2 Company faces a concentrated regulatory risk compared to many of its peers  
3 because 95 percent of its retail revenues come from one jurisdiction (i.e., Idaho).  
4 Both equity analysts and the credit agencies consistently identify regulatory risk as  
5 one of the chief risk factors for the Company. This lack of diversification, combined  
6 with the relatively small size, would argue for a higher required return from investors  
7 compared to Idaho Power's peers.

### 8 **III. CAPITAL STRUCTURE**

9 **Q. Would you please describe Exhibit 502?**

10 A. Exhibit 502 details the calculation of Idaho Power's capital structure for long-term  
11 debt, the common equity balance resulting from the Company's forecasted year-end  
12 2011 capital structure prepared under my direction, and the resulting recommended  
13 overall rate of return.

14 **Q. The capital structure presented on Exhibit 502 incorporates changes to the  
15 Company's financial reporting of its capital structure. Could you please  
16 discuss the rationale for the variance?**

17 A. For financial reporting purposes, the American Falls Bond Guarantee and the Milner  
18 Dam Note Guarantee are included in the long-term debt portion of the capital  
19 structure. For ratemaking purposes, the interest costs associated with both the  
20 American Falls and the Milner debt securities are treated as operations and  
21 maintenance expenses. Even with these exclusions, the capital structure presented  
22 in my Exhibit 502 is reasonable in light of industry and rating agency criteria.

23 **Q. What is the Company's proposed cost of debt?**

24 A. As shown on Exhibit 503, which details the calculation of the cost of debt used in the  
25 estimated year-end 2011 capital structure, the Company's proposed cost of debt is  
26 5.728 percent.



1 **Q. Does the Company utilize variable rate securities in its long-term**  
2 **capitalization?**

3 A. Yes. The Company currently utilizes one variable rate security in its long-term  
4 capitalization. The Port of Morrow (Boardman) Pollution Control Revenue Bonds  
5 Variable Rate Series 2000 (\$4.36 million) is listed on line 21 of Exhibit 503.

6 **Q. Would you please describe the variable rate nature of this pollution control**  
7 **bond?**

8 A. This variable rate pollution control bond, although considered a long-term security,  
9 has features that allow the Company to take advantage of rates applicable to short-  
10 term securities. The interest rate is determined the first day of a weekly period by a  
11 Remarketing Agent. The Remarketing Agent examines tax-exempt obligations  
12 comparable to the Boardman Variable Bonds known to have been priced or traded  
13 under the then-prevailing market conditions and finds the lowest rate which would  
14 enable sale of the Boardman Variable Rate Bonds.

15 **Q. How did you determine what rate to use for the Boardman Variable Rate Bond?**

16 A. I used actual rates for January through March 2011 and forecasted the remaining  
17 2011 monthly rates. For the forecast, I combined monthly rates from the Securities  
18 Industry and Financial Markets Association ("SIFMA") forward curve, a commonly  
19 used and accepted industry metric, with the observed spread between the Boardman  
20 Variable Rate Bond and the SIFMA rate. The spread I used was 1.25 percent over  
21 the SIFMA rate--this was the average spread from mid-April through December of  
22 2010. Prior to this time, the spread was significantly higher. The average rate for  
23 the year, when combining the actual and forecasted rates, is 1.55 percent, which is  
24 actually lower than the average rate observed for this bond in 2010.

25 **Q. Please comment on the structure and rates for the Humboldt and Sweetwater**  
26 **County bonds and how they differ from the last rate case.**

1 A. In the last rate case, the Sweetwater and Humboldt County bonds were in an auction  
2 rate mode that reset periodically (every seven days for Sweetwater and every 35  
3 days for Humboldt). The mode had produced short-term rates for the long-dated  
4 securities even lower than the Boardman Variable Rate Bonds, and these benefits  
5 have been passed on to customers through a lower overall cost of capital structure  
6 since 2003. However, in February of 2008, the entire auction rate market began to  
7 deteriorate rapidly based on overall credit worries in the market, specifically around  
8 the mono-line insurers which guarantee a large portion of the debt in this market.  
9 Both the Sweetwater and Humboldt bonds began to experience much higher reset  
10 rates through the auction process (e.g., between 7 and 10 percent for Sweetwater).  
11 The Company arranged for a short-term loan and used the proceeds to purchase  
12 these bonds and hold them in Idaho Power's name. In August of 2009, the  
13 Company remarketed these bonds into long fixed rate modes, which are reflected on  
14 my Exhibit 503.

15 **Q. Has there been any other significant refinancing in recent years?**

16 A. Yes. In 2010, Idaho Power made a somewhat unusual decision to prefund an  
17 obligation for first mortgage bonds that were due in 2011, slightly more than six  
18 months early. The prefunding decision required the Company to incur negative  
19 carrying costs relative to the investment opportunities that were available. This  
20 decision secured some of the lowest long-term financing rates that Idaho Power has  
21 ever enjoyed—\$100 million at a 3.4 percent coupon for 10 years and \$100 million at a  
22 4.85 percent coupon for 30 years. The rates achieved were record setting in the  
23 time frame they occurred and will be beneficial to customers for many years to come  
24 as the proceeds of this financing were used to prefund near-term construction costs  
25 and repay \$120 million of outstanding mortgage bonds due on March 2, 2011, that  
26 carried a coupon of 6.6 percent. While not listed as a risk factor, opportunities to

1 retire existing bonds with less costly financing will be more difficult in the near term.  
2 The next two tranches of first mortgage bonds due for redemption in 2012 and 2013  
3 carry coupons below 5 percent.

4 **Q. Please explain the discrepancy between the Company's actual 2010 debt-to-**  
5 **equity ratio and the projected year-end 2011 debt-to-equity ratio?**

6 A. The projected growth in equity between year-end 2010 and year-end 2011 is based  
7 upon two primary factors: (1) the amount of anticipated net income and (2) the  
8 possibility of issuing additional equity under the Company's continuing equity  
9 program. Currently, there are approximately 1.2 million shares remaining available  
10 to be sold under the current sales agency agreement entered into pursuant to  
11 IDACORP's continuous equity program. Selling those authorized shares, together  
12 with the Company's anticipated net income for 2011, account for the difference  
13 between year-end 2010 debt-to-equity ratio and the anticipated year-end 2011 debt-  
14 to-equity ratio.

15 **IV. OVERALL COST OF CAPITAL**

16 **Q. What is the overall cost of capital for Idaho Power?**

17 A. As shown on Exhibit 502, using the Company's projected year-end 2011 capital  
18 structure, the Company's cost of debt as presented in my testimony, and  
19 incorporating the recommended 10.5 percent cost of equity, the resultant overall cost  
20 of capital for Idaho Power is 8.17 percent. This is an appropriate rate of return to be  
21 utilized by the Commission when deriving the Company's revenue requirement.

22 **Q. Does this conclude your direct testimony in this case?**

23 A. Yes, it does.  
24  
25  
26

Idaho Power/501  
Witness: Steven R. Keen

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

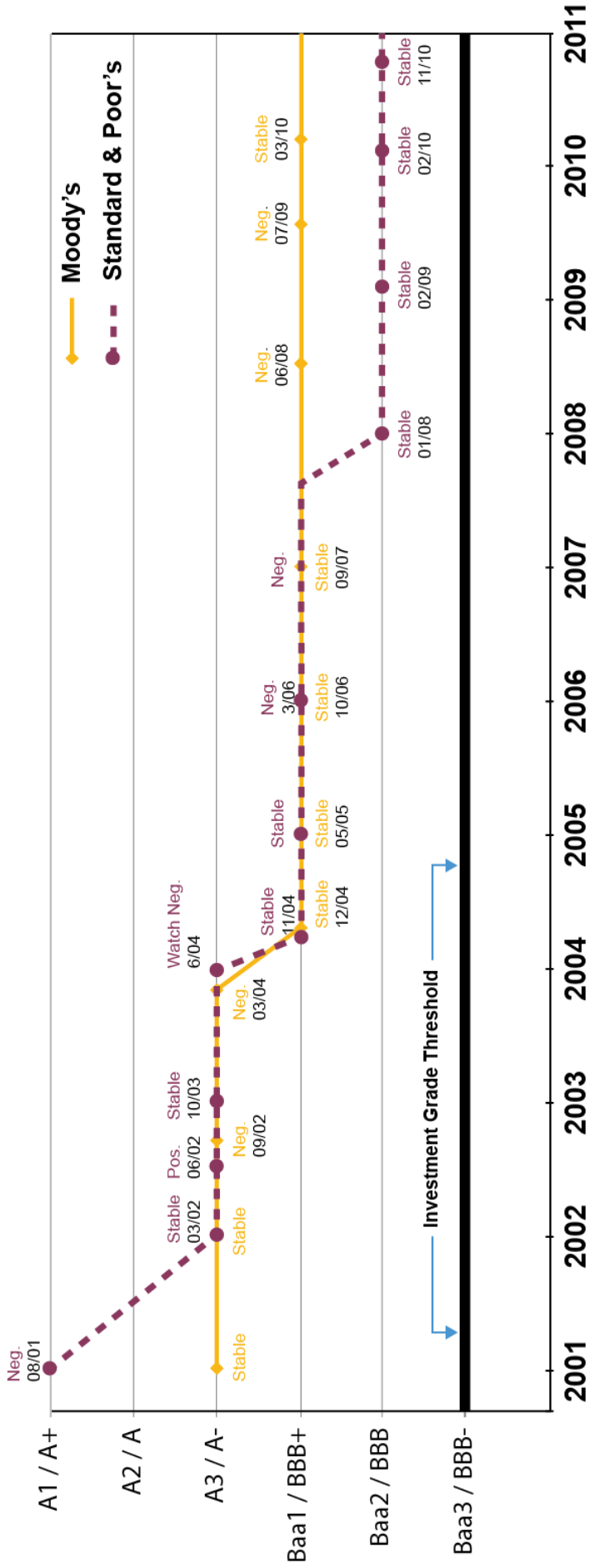
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Exhibit Accompanying Testimony of Steven R. Keen  
Idaho Power Corporate Credit Ratings 2001-2010

July 29, 2011



# Idaho Power Corporate Credit Ratings 2001 – 2010



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Steven R. Keen  
Pro Forma Cost of Capital Summarized

July 29, 2011

**IDAHO POWER COMPANY**

**PRO FORMA COST OF CAPITAL  
SUMMARIZED  
December 31, 2011 Capitalization**

Line No	(1)	(2)	(3)	(4)	(5)
		<u>Capitalization Structure</u>		<u>Embedded</u>	<u>Weighted</u>
		<u>Amount</u>	<u>Percent</u>	<u>Cost</u>	<u>Cost</u>
1 Long-term Debt		1,465,460,000	48.824%	5.728%	2.797%
2 Preferred Stock		0	0.000%	0.000%	0.000%
3 Common Equity		<u>1,536,028,822</u>	<u>51.176%</u>	10.500% *	<u>5.373%</u>
4 Total Capitalization		<u><u>\$3,001,488,822</u></u>	<u><u>100.000%</u></u>		<u><u>8.170%</u></u>

**Note:**

\* Requested Rate of Return

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Steven R. Keen  
Pro Forma Cost of Long-Term Debt

July 29, 2011



**IDAHO POWER COMPANY**  
PRO FORMA COST OF LONG-TERM DEBT  
As of 12/31/2011  
(000's)

Line No.	(1) Class and Series	(2) Coupon Rate	(3) Settlement Date	(4) Maturity Date	(5) Principal Amount		(7) Price	(8) Discount	(9) Issuance Costs	(10) Net Proceeds	(11) Yield To Maturity	(12) Effective Cost
					Issued	Outstanding						
<u>First Mortgage Bonds:</u>												
1	4.75% Series, due 2012	4.75%	11/15/2002	11/15/2012	100,000	100,000	98,948	1,052.0	1,066.2	97,881.8	5.022%	5,022.0
2	6.00% Series, due 2032	6.00%	11/15/2002	11/15/2032	100,000	100,000	99,456	544.0	1,191.2	98,264.8	6.127%	6,127.1
3	4.25% Series, due 2013	4.25%	5/13/2003	10/1/2013	70,000	70,000	99,465	374.5	641.2	68,984.3	4.425%	3,097.7
4	5.5% Series, due 2033	5.5%	5/13/2003	4/1/2033	70,000	70,000	99,948	36.4	4,335.2	65,628.4	5.949%	4,164.3
5	5.5% Series, due 2034	5.5%	3/26/2004	3/15/2034	50,000	50,000	99,233	383.5	524.4	49,092.1	5.626%	2,813.0
6	5.875% Series, due 2034	5.875%	8/16/2004	8/15/2034	55,000	55,000	98,640	748.0	585.8	53,666.2	6.051%	3,328.2
7	5.30% Series, due 2035	5.30%	8/26/2005	8/15/2035	60,000	60,000	99,319	408.6	3,849.7	55,741.7	5.802%	3,481.3
8	6.30% Series, due 2037	6.30%	6/22/2007	6/15/2037	140,000	140,000	99,801	278.6	1,500.0	138,221.4	6.396%	8,953.9
9	6.25% Series, due 2037	6.25%	10/18/2007	10/15/2037	100,000	100,000	99,732	268.0	1,227.5	98,504.5	6.362%	6,362.3
10	6.025% Series, due 2018	6.025%	7/10/2008	7/15/2018	120,000	120,000	100,000	0.0	1,664.6	118,335.4	6.213%	7,455.6
11	6.15% Series, due 2019	6.15%	3/30/2009	4/1/2019	100,000	100,000	99,815	185.0	1,034.9	98,780.1	6.316%	6,316.3
12	4.50% Series, due 2020	4.50%	11/20/2009	3/1/2020	130,000	130,000	99,819	235.3	1,199.4	128,565.3	4.635%	6,026.0
13	3.40% Series, due 2020	3.40%	8/30/2010	11/1/2020	100,000	100,000	99,501	499.0	1,129.4	98,371.6	3.592%	3,592.2
14	4.85% Series, due 2040	4.85%	8/30/2010	8/15/2040	100,000	100,000	99,830	170.0	1,254.4	98,575.6	4.941%	4,941.5
15												
16	Total First Mortgage Bonds				1,295,000	1,295,000		5,182.9	21,204.1	1,268,613.0	5.650%	71,681.2
17												
<u>Pollution Control Revenue Bonds:</u>												
18	Sweetwater 5.25% Series, due 2026	5.25%	8/20/2009	7/15/2026	116,300	116,300	100,000	0.0	8,634.3	107,665.7	5.952%	6,922.2
19	Humboldt 5.15% Series 2003, due 2024	5.15%	8/20/2009	12/1/2024	49,800	49,800	100,000	0.0	4,355.0	45,445.0	6.033%	3,004.5
20	Port of Morrow Series 2000, due 2027	1.55%	5/17/2000	2/1/2027	4,360	4,360	100,000	0.0	170.3	4,189.7	1.731%	75.5
21												
22												
23	Total Pollution Control Revenue Bonds				170,460	170,460		0.0	13,159.7	157,300.3	6.359%	10,002.2
24												
25	TOTAL DEBT CAPITAL				1,465,460	1,465,460		5,182.9	34,363.8	1,425,913.3	5.728%	81,683.3

<sup>1</sup> Forecasted 2011 rate. See Cost of Long-Term Variable Rate Debt schedule.

NOTE: American Falls Dam Bond and Milner Dam Note are guarantees. These instruments are excluded from rate making calculations and therefore are omitted from this schedule.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE** \_\_\_\_\_

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**DOUGLAS N. JONES**

**July 29, 2011**

1 **Q. Please state your name, business address, and present occupation.**

2 A. My name is Douglas N. Jones and my business address is 1221 West Idaho Street,  
3 Boise, Idaho. I am employed by Idaho Power Company (“Idaho Power” or  
4 “Company”) as the Team Leader of Regulatory Accounting and Support.

5 **Q. What is your educational background?**

6 A. I graduated in 1980 from Boise State University, receiving a Bachelor of Business  
7 Administration degree in Accounting. I have also attended numerous accounting,  
8 finance, and regulatory courses, including the Edison Electric Institute’s advanced  
9 ratemaking course, the University of New Mexico’s College of Business and  
10 Economics Center for Public Utilities basic ratemaking course, and the Financial  
11 Accounting Institute’s utility finance and accounting course.

12 **Q. Please outline your business experience.**

13 A. Before joining Idaho Power, I spent 14 years in various accounting and supervisory  
14 roles for Morrison-Knudsen Company and Ore-Ida Foods. In 1993, I joined Idaho  
15 Power as an accountant in the Property Accounting Department. In 2002, I was  
16 promoted to Financial Analyst and later, in 2004, to Business Analyst within the  
17 Financial Reporting Department under the Regulatory Accounting and Support area.  
18 In this last position, I was responsible for modeling, analyzing, and recording of  
19 power cost adjustments and deferrals in both Oregon and Idaho. I was also  
20 responsible for overseeing all regulatory audits and preparing regulatory analysis  
21 and disclosures, both internally and externally, for the Company’s quarterly and  
22 annual reports. In July 2006, I was promoted to Team Leader of Regulatory  
23 Accounting and Support within the Strategic Analysis Department.

24 **Q. What are your duties as Team Leader of Regulatory Accounting and Support?**

25 A. I am responsible for all areas of regulatory reporting and I act as the finance liaison  
26 to the Regulatory Affairs Department.

1 **Q. What is the purpose of your testimony in this proceeding?**

2 A. The purpose of my testimony is two-fold. First, I will present the Company's  
3 historical actual audited financial information for the 12-month period ended  
4 December 31, 2010. Second, my testimony will discuss the quantification of certain  
5 adjustments to operating expenses and rate base consistent with previous Public  
6 Utility Commission of Oregon ("OPUC" or "Commission") and Idaho Public Utilities  
7 Commission ("IPUC") directives regarding regulatory treatment that result in an  
8 adjusted historical actual 12-month period ended December 2010 ("2010 Base").

9 **Q. Please describe the manner in which the 2010 financial data is presented.**

10 A. Actual 2010 financial data is presented using the account names from the  
11 Commission-approved Uniform System of Accounts ("USA"). This data has been  
12 fully audited and was reported to the Securities and Exchange Commission and the  
13 Federal Energy Regulatory Commission ("FERC") in the Company's Form 10-K and  
14 FERC Form 1, respectively. The components of the 2010 financial data include the  
15 following items: (1) other operating revenues; (2) other revenues and expenses; (3)  
16 operation and maintenance expenses; (4) property insurance expenses; (5)  
17 regulatory commission expenses; (6) depreciation and amortization expense; (7)  
18 electric plant/regulatory assets - amortizations, adjustments, gains, and losses; (8)  
19 regulatory debits and credits; (9) taxes other than income taxes; (10) Idaho Energy  
20 Resources Company's statement of income and rate base components; (11) electric  
21 plant in service and related items; (12) materials and supplies; (13) other deferred  
22 programs; (14) accumulated deferred income taxes; (15) customer advances for  
23 construction; and (16) certain deductions from operating and maintenance expenses.

24 **Q. Please describe the rationale for quantifying adjustments to the 2010 actual**  
25 **financial data ("2010 Actuals").**

26

1 A. For the most part, the adjustments I have quantified to 2010 Actuals are in  
2 conformance with prior OPUC and IPUC orders and thus have become, in the  
3 opinion of the Company, standard regulatory adjustments. The only adjustment that  
4 is not the result of prior orders is an adjustment to Other Operating Revenues. I will  
5 discuss the rationale for this adjustment later in my testimony.

6 The Company has made several adjustments to remove specific expenses in  
7 conformance with directives of both the OPUC and IPUC. These adjustments  
8 provide consistent treatment in both jurisdictions to the benefit of Oregon customers.  
9 These adjustments include the removal of general advertising expenses, specific  
10 memberships and contributions, certain management expenses, and other  
11 exclusions that, although justified for business purposes, may be viewed as more  
12 appropriately funded by shareholders than customers and therefore not recoverable  
13 through the Company's rates. The following have also been removed: (1) the  
14 unamortized portion of the Electric Plant Amortization Adjustment associated with the  
15 Prairie Power Rural Electric Cooperative purchase; (2) plant that was determined to  
16 no longer be used and useful at the Bridger Coal plant; (3) all 2010 incentive  
17 compensation; (4) the financial impacts of both the Oregon and Idaho Energy  
18 Efficiency Rider revenues and expenses; and, finally, (5) the removal of  
19 amortizations for some preliminary survey and investigation costs, architectural fees,  
20 and specific Idaho Intervenor funding that ceased in 2010. Mr. Timothy E. Tatum's  
21 testimony addresses the 2011 incentive compensation amount that is included in the  
22 test year.

23 **Q. Please describe the Company proposed adjustment to Other Operating**  
24 **Revenues.**

25 A. The Company proposes an adjustment to Other Operating Revenues to reflect an  
26 increase to Facilities Charge revenues. In preparation of this case, it was discovered

1 that, in 2010, some revenues received from Schedule 9 customers for facilities  
2 charges were recorded to FERC Account 442, Commercial and Industrial Sales,  
3 instead of the correct FERC Account 454, Rent from Electric Property. This  
4 adjustment corrects that accounting error.

5 **Q. How has the Company treated prepayments in this case?**

6 A. Prepayments have been removed in their entirety, consistent with previous  
7 Commission orders. This adjustment is reflected in Ms. Kelley Noe's Exhibit 904.

8 **Q. Are you sponsoring exhibits that contain the 2010 Actuals and 2010**  
9 **adjustments by the components you have just identified?**

10 A. Yes. I am sponsoring Exhibits 601 through 603 which detail 2010 Actuals and the  
11 2010 adjustments by component categories. The additional adjustments to get from  
12 the 2010 Base to the 2011 Test Year, which are also contained in my exhibits, are  
13 addressed by Mr. Tatum in his testimony.

14 **Q. Please describe Exhibit 601.**

15 A. Exhibit 601 is a compilation of the Company's supporting schedules for the adjusted  
16 historical actual data for the 12-month period ended December 31, 2010.

17 **Q. Please describe page 1 of Exhibit 601.**

18 A. Page 1 of Exhibit 601 reflects the detail for Other Operating Revenues, Accounts  
19 451, 454, and 456.

20 **Q. Please explain the adjustments you have made on page 1 of Exhibit 601, Other**  
21 **Operating revenues, to arrive at the 2010 Base.**

22 A. As discussed earlier in my testimony, the amount included on line 9, column 4  
23 reflects an increase in Facilities Charge revenue to correct for amounts incorrectly  
24 booked to FERC Account 442. Because the test year revenue values for Account  
25 442 are developed using forecasted billing determinants, an offsetting adjustment to  
26 that account is not needed. The adjustment on line 19, column 4 to the 2010 Actuals

1 removes the impact of the Oregon and Idaho Energy Efficiency Rider revenues  
2 (IPUC Order No. 30189).

3 **Q. Please describe pages 2 through 12 of Exhibit 601.**

4 A. Page 2 of Exhibit 601 reflects the detail of Other Revenues and Expenses, Accounts  
5 415 and 416. Pages 3 through 6 reflect the Operation and Maintenance Expenses  
6 (“O&M”) by USA account. Page 7 reflects the detail of Property Insurance Expense,  
7 Account 924. Page 8 reflects the detail of Regulatory Commission Expenses,  
8 Account 928. Page 9 includes Depreciation and Amortization Expense, Accounts  
9 403 and 404. Page 10, Electric Plant/Regulatory Assets – Amortizations,  
10 Adjustments, Gains, and Losses, Account 406, presents the Prairie Power  
11 acquisition amortization adjustment. Page 11 reflects Regulatory Debits and Credits,  
12 Accounts 407.3 and 407.4, respectively. Page 12 shows the detail of Taxes Other  
13 Than Income Taxes.

14 **Q. Please describe the adjustments quantified on page 12 of Exhibit 601, Taxes  
15 Other Than Income Taxes, to arrive at the adjusted 2010 Base.**

16 A. The amounts included on lines 1, 2, and 19 of page 12, column 3 in Exhibit 601 are  
17 eliminated by the state and federal payroll loading reversal on line 22, column 3.  
18 These amounts represent federal unemployment, Social Security, and state  
19 unemployment taxes, respectively. The state and federal payroll loading reversal  
20 effectively removes these amounts from Taxes Other Than Income Taxes and  
21 spreads them over all accounts that receive labor charges. Therefore, the  
22 adjustments in column 4, page 12 eliminate these expenses in their entirety in order  
23 to demonstrate that these amounts are not double counted when determining the  
24 Company’s revenue requirement.

25 **Q. Please describe page 13 of Exhibit 601.**

26

1 A. Page 13 of Exhibit 601 reflects the net earnings of Idaho Energy Resources  
2 Company (“IERCo”) that are added to operating income for ratemaking purposes.

3 **Q. Who is IERCo?**

4 A. IERCo is a wholly owned subsidiary of Idaho Power. The primary purpose of IERCo  
5 is to mine the coal that fuels the Jim Bridger thermal power plant in Wyoming.

6 **Q. How does the Company treat IERCo’s earnings and investment for ratemaking  
7 purposes?**

8 A. Consistent with prior Commission orders, the Company treats IERCo’s coal  
9 operations as a part of its utility operations and, accordingly, adds the current year  
10 IERCo earnings to electric operating income and the investment in IERCo to the net  
11 electric rate base. Accordingly, the interest expense net of tax (line 13, page 13 of  
12 Exhibit 601) on notes payable to Idaho Power has been added back to IERCo’s Net  
13 Income from Operations. Additionally, the notes payable (column 5, page 21 of  
14 Exhibit 601) to Idaho Power have been added to IERCo’s rate base in determining  
15 the Company’s net investment in IERCo to be included in total system rate base.

16 **Q. Please describe the adjustments to IERCo’s net earnings and rate base in this  
17 proceeding.**

18 A. Adjustments were made to increase IERCo’s rate base for notes payable to Idaho  
19 Power in the amount of \$19,880,651 (column 5, line 14, page 21 of Exhibit 601) and  
20 the associated interest expense adjustment net of income tax of \$29,165 (column 3,  
21 line 13, page 13 of Exhibit 601) in order for IERCo’s rate base and earnings to reflect  
22 only the cash required to fund IERCo operations for the year 2010. If IERCo were to  
23 use these funds to make a distribution of earnings to the Company, or if the  
24 Company were to actually fold IERCo into its own operations, the result would be the  
25 same as presented herein.

26 **Q. Please describe the data contained on pages 14 through 21 of Exhibit 601?**



1 A. Pages 14 through 21 of Exhibit 601 reflect the development of all components  
2 applicable to the combined system rate base of the Company for the test year 2011  
3 as directed by Mr. Tatum. Page 14 reflects the balance by month and the 13-month  
4 average of Electric Plant in Service, Account 101. Page 15 reflects the balance by  
5 month and the 13-month average of Accumulated Provision for Depreciation,  
6 Account 108. Page 16 reflects the balance by month and the 13-month average of  
7 Accumulated Provision for Amortization, Account 111. Page 17 reflects the balance  
8 by month and the 13-month average of Materials and Supplies, Accounts 154 and  
9 163. Page 18 reflects the balance of the Company's Other Deferred Programs. For  
10 these programs, the Company has included the December 31, 2010, ending balance  
11 in rate base, consistent with previous orders.

12 **Q. Please describe in more detail Other Deferred Programs on page 18 of Exhibit**  
13 **601.**

14 A. Previous Commission-approved programs included on page 18 of Exhibit 601 are  
15 the American Falls bond refinancing costs (IPUC Order No. 25880) and Intervenor  
16 funding costs (IPUC Order No. 30722). The American Falls bond refinancing is  
17 being amortized over the life of the American Falls bond and will be fully amortized in  
18 2025. The Intervenor funding costs are assumed to be amortized and recovered  
19 over a one-year period.

20 Also included on Exhibit 601 is the Citizens' Utility Board of Oregon's 2010  
21 Fund Grant (OPUC Order No. 10-406), the Statement of Financial Accounting  
22 Standards 87 capitalized pension costs (OPUC Order No. 10-064), Oregon's  
23 unamortized jurisdictional portion of the Grid West loans (OPUC Order No.06-483),  
24 and the FERC's unamortized jurisdictional portion of the Grid West loans.

25 **Q. Please describe the remaining pages in Exhibit 601.**

26

1 A. Page 19 of Exhibit 601 reflects the balance at the beginning and end of 2010 and the  
2 average balance for Accumulated Deferred Income Taxes, Accounts 190, 282, and  
3 283. Page 20 reflects the balance by month and the 13-month average balance of  
4 Customer Advances for Construction, Account 252. Page 21 reflects the balance by  
5 month and 13-month average of the rate base components for IERCo consistent with  
6 prior OPUC and IPUC orders.

7 **Q. Please describe Exhibit 602.**

8 A. Exhibit 602 reflects the detailed support of deductions from the O&M expense of the  
9 Company for general advertising expenses, certain memberships and contributions,  
10 senior management expenses, and miscellaneous other expenses. This screening  
11 process is consistent with previous Oregon and Idaho general rate case filings.

12 **Q. Please describe in more detail pages 2 through 10 of Exhibit 602.**

13 A. The Company has put processes in place to review and screen its accounting  
14 records to identify memberships and contributions in an effort to properly identify,  
15 account for, and share the costs of each. All contributions and one-third to 100  
16 percent of certain memberships have been removed. This screening process is  
17 consistent with previous Oregon and Idaho general rate case filings. Additionally,  
18 senior management expenses have been reviewed and adjusted by (1) removing  
19 100 percent of all charges to the Arid Club, (2) removing one-third of Edison Electric  
20 Institute expenses, and (3) allocating the balance of expense account charges of  
21 senior management between Idaho Power and IDACORP on the basis of how their  
22 payroll is charged. Five officers had no further allocation based on payroll because  
23 they either incurred no expenses, their management responsibilities are solely  
24 incurred on behalf of Idaho Power, or their expenses are reviewed monthly for proper  
25 allocation between IDACORP and Idaho Power, thus not requiring further allocation.  
26 Lastly, the Company has reviewed all expense account charges to O&M in an effort

1 to identify and exclude charges from regulatory recovery based on prior concerns  
2 expressed in previous Idaho general rate case filings based solely on the name of  
3 the business establishment. While these expense account charges are legitimate  
4 business expenses, out of an abundance of caution, they were removed.

5 **Q. Please describe Exhibit 603.**

6 A. Exhibit 603 was developed to identify and include or exclude specific rate base,  
7 revenue, and expense adjustments which have not been provided for elsewhere.  
8 These and/or similar adjustments have been made in previous general rate cases.

9 **Q. Please describe the adjustments you have included in this Exhibit 603.**

10 A. Lines 1 through 3 of Exhibit 603 reflect the unamortized portion of the Electric Plant  
11 Acquisition Adjustment associated with the Prairie Power Rural Electric Cooperative  
12 purchase in July 1992.

13 Line 4 of Exhibit 603 reflects a decrease to Investment in Associated  
14 Companies (IERCo), Account 123, for a portion of plant deemed not used and useful  
15 at the Bridger Coal plant, per IPUC Order No. 29505.

16 Lines 5 through 7 of Exhibit 603 reflect increases due to forecasted pension  
17 expense amortization that is discussed in Mr. Tatum's testimony.

18 Lines 8, 9, 10, and 11 of Exhibit 603 remove the income statement impact of  
19 the Idaho Energy Efficiency Rider (formerly DSM Rider) accounting affecting Other  
20 Electric Revenues, Account 456, and Customer Assistance Expenses, Account 908,  
21 in accordance with IPUC Order No. 30189. While the purpose of these entries is to  
22 demonstrate that the Energy Efficiency Rider revenues and expenses have been  
23 excluded from the revenue requirement, leaving these amounts in the income  
24 statement would have had no impact to the revenue requirement since they are a net  
25 zero adjustment.

26

1           Line 12 of Exhibit 603 removes the 2010 amortization of the deferred  
2 Preliminary Survey and Engineering costs that will not recur in 2011 because the  
3 deferred balance will be fully amortized in September 2010.

4           Line 13 of Exhibit 603 removes all 2010 incentives included in Administrative  
5 and General Salaries, Account 920. Test year 2011 incentive expense for which the  
6 Company seeks recovery is addressed in Mr. Tatum's testimony.

7           Line 14 of Exhibit 603 removes the 2010 amortization of the deferred  
8 architectural fees that will not recur in 2011 because the deferred balance will be fully  
9 amortized in November 2010.

10          Lines 15 through 22 of Exhibit 603 include the 2011 projected Intervenor  
11 funding amortization that is discussed in detail in Mr. Tatum's testimony and reflected  
12 in his exhibits.

13          Lines 23 and 24 of Exhibit 603 remove the 2010 amortization of deferred  
14 Intervenor funding that will not recur in 2011 because the deferred balances will be  
15 fully amortized in January 2010.

16 **Q. Are all the data and associated adjustments made to your exhibits and**  
17 **supporting schedules calculated on a total system basis?**

18 A. Yes.

19 **Q. Does this conclude your direct testimony in this case?**

20 A. Yes, it does.

21  
22  
23  
24  
25  
26

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Douglas N. Jones  
Adjusted Historical Actual Financial Data

July 29, 2011

IDAHO POWER COMPANY  
OTHER OPERATING REVENUES  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3)	(4)	(5)	(6)	(7)		(8)	(9)	(10)	(11)
		2010 Actuals	2010 Adjustments	2010 Base	2010 Base	Forecast Methodology 2010	Other	Forecast Adjustment	Ref No	2011 Unadjusted Test Year	Annualizing
		\$	\$	\$	YES	\$	\$	\$	\$	\$	\$
1	Miscellaneous service revenues (451).....	3,532,832	-	3,532,832	YES	-	-	-	3,532,832	-	3,532,832
	Rent from electric property (454):										
2	Substation equipment.....	9,968,654	-	9,968,654	YES	-	-	-	9,968,654	-	9,968,654
3	Transformer & distribution rentals.....	17,330	-	17,330	YES	-	-	-	17,330	-	17,330
4	Station and line rentals.....	2,067,177	-	2,067,177	YES	-	-	-	2,067,177	-	2,067,177
5	Cogeneration and small power production.....	659,903	-	659,903		197,439	197,439		857,342	-	857,342
6	Real estate rents.....	240,575	-	240,575	YES	-	-	-	240,575	-	240,575
7	Dark fiber rents.....	448,000	-	448,000	YES	-	-	-	448,000	-	448,000
8	Joint pole attachments.....	1,660,518	-	1,660,518	YES	-	-	-	1,660,518	-	1,660,518
9	Facilities charges.....	5,740,276	1,786,566	7,526,842		(1,214,026)	(1,214,026)		6,312,816	-	6,312,816
10	Overnight park rents.....	338,693	-	338,693	YES	-	-	-	338,693	-	338,693
11	Miscellaneous.....	-	-	-		-	-	-	-	-	-
12	Total rent from electric property.....	21,141,126	1,786,566	22,927,692		(1,016,587)	(1,016,587)		21,911,105	-	21,911,105
	Other electric revenue (456):										
13	Network Service .....	4,739,971	-	4,739,971		739,280	739,280		5,479,251	-	5,479,251
14	Point - to - Point and other services.....	10,668,431	-	10,668,431		1,799,219	1,799,219		12,467,650	-	12,467,650
15	Photovoltaic.....	5,007	-	5,007	YES	-	-	-	5,007	-	5,007
16	Antelope.....	73,824	-	73,824	YES	-	-	-	73,824	-	73,824
17	Sierra Pacific Power Company sales.....	(65,846)	-	(65,846)		55,846	55,846		-	-	-
18	Stand-by service .....	309,185	-	309,185	YES	-	-	-	309,185	-	309,185
19	Energy efficiency rider .....	44,184,056	(44,184,056)	-	YES	-	-	-	-	-	-
20	Miscellaneous.....	1,769	-	1,769	YES	-	-	-	1,769	-	1,769
21	Total other electric revenue.....	59,916,397	(44,184,056)	15,732,341		2,594,345	2,594,345		18,326,686	-	18,326,686
22	Total other operating revenues.....	84,590,355	(42,397,490)	42,192,865		1,577,758	1,577,758	<b>A</b>	43,770,623	-	43,770,623

IDAHO POWER COMPANY  
OTHER REVENUES AND EXPENSES  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Program	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology 2010		(7) Other	(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					Base	Other					
Other Revenues (Acct 415):											
1	Power Solutions.....	\$ 310,216	\$ -	\$ 310,216	YES		\$ -	\$ -	\$ 310,216	\$ -	\$ 310,216
2	Hydro Services.....	-	-	-	YES		-	-	-	-	-
3	Water Management Services.....	241,330	-	241,330	YES		-	-	241,330	-	241,330
4	QRE Reporting.....	6,351	-	6,351	YES		-	-	6,351	-	6,351
5	Joint Use (Pole) - Idaho.....	216,838	-	216,838	YES		-	-	216,838	-	216,838
6	Joint Use (Pole) - Oregon.....	9,880	-	9,880	YES		-	-	9,880	-	9,880
7	Total.....	\$ 784,615	\$ -	\$ 784,615			\$ -	\$ -	\$ 784,615	\$ -	\$ 784,615
Other Expenses (Acct 416):											
8	Power Solutions.....	\$ 218,579	\$ -	\$ 218,579	YES		\$ -	\$ -	\$ 218,579	\$ -	\$ 218,579
9	Hydro Services.....	3,181	-	3,181	YES		-	-	3,181	-	3,181
10	Water Management Services.....	117,680	-	117,680	YES		-	-	117,680	-	117,680
11	QRE Reporting.....	1,432	-	1,432	YES		-	-	1,432	-	1,432
12	Joint Use - Idaho.....	268,473	-	268,473	YES		-	-	268,473	-	268,473
13	Joint Use - Oregon.....	4,810	-	4,810	YES		-	-	4,810	-	4,810
14	Total.....	\$ 614,155	\$ -	\$ 614,155			\$ -	\$ -	\$ 614,155	\$ -	\$ 614,155

**B**

**C**

IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
For Twelve Months Ended December 31, 2011

(1) LINE NO	(2) FERC ACCOUNT NUMBER	(3) DESCRIPTION	(4) 2010 Actuals	(5) 2010 Adjustments	(6) 2010 Base	(7) Forecast Methodology		(9) Forecast Adjustment	Ref No	(10) 2011 Unadjusted Test Year	(11) Annualizing	(12) 2011 Test Year
						2010 Base	Other					
Power production expenses:												
Steam power generation -												
Operation -												
1	500	Oper and supv engineering.....	\$ 1,888,571	\$ -	\$ 1,888,571	\$ -	\$ 290,346	\$ 290,346		\$ 2,178,917	\$ 9,936	\$ 2,188,853
2	501	Fuel.....	-	-	-	-	-	-		-	-	-
3	502	Steam expenses.....	7,337,561	-	7,337,561	1,280,002	1,280,002	1,280,002		8,617,563	-	8,617,563
4	505	Electric expenses.....	2,140,193	-	2,140,193	373,346	373,346	373,346		2,513,539	-	2,513,539
5	506	Misc steam power expenses.....	9,797,756	(64,325)	9,733,431	1,705,192	1,705,192	1,705,192		11,438,623	1,021	11,439,644
6	507	Rents.....	229,316	-	229,316	40,002	40,002	40,002		269,318	-	269,318
7		Total operation.....	21,383,397	(64,325)	21,329,072	3,688,888	3,688,888	3,688,888		25,017,960	10,957	25,028,917
Maintenance -												
8	510	Main supv and engineering.....	2,292,767	-	2,292,767	399,962	399,962	399,962		2,692,729	-	2,692,729
9	511	Main of structures.....	309,374	-	309,374	53,969	53,969	53,969		363,343	-	363,343
10	512	Main of boiler plant.....	16,067,832	-	16,067,832	2,802,957	2,802,957	2,802,957		18,870,789	-	18,870,789
11	513	Main of electric plant.....	3,915,290	-	3,915,290	683,004	683,004	683,004		4,598,294	-	4,598,294
12	514	Main of misc steam plant.....	3,753,015	-	3,753,015	654,696	654,696	654,696		4,407,711	-	4,407,711
13		Total maintenance.....	26,338,278	-	26,338,278	4,594,588	4,594,588	4,594,588		30,932,866	-	30,932,866
14		Total steam power generation.....	47,731,675	(64,325)	47,667,350	8,283,476	8,283,476	8,283,476		55,950,826	10,957	55,961,783
Hydraulic power generation -												
Operation -												
15	535	Oper supv and engineering.....	5,362,099	(66)	5,362,033	190,700	190,700	190,700		5,552,733	163,743	5,716,476
16	536	Water for power.....	7,322,751	(22)	7,322,729	243,349	243,349	243,349		7,566,078	22,062	7,588,140
17	537	Hydraulic expenses.....	10,671,807	(2,500)	10,669,307	1,099,261	1,099,261	1,099,261		11,768,568	184,740	11,953,308
18	538	Electric expenses.....	1,565,842	-	1,565,842	55,419	55,419	55,419		1,621,261	44,866	1,666,127
19	539	Misc hydro pwr gen exp.....	2,895,723	(351)	2,895,372	101,775	101,775	101,775		2,997,147	74,311	3,071,458
20	540	Rents.....	406,432	-	406,432	13,404	13,404	13,404		419,836	-	419,836
21		Total operation.....	28,224,654	(2,939)	28,221,715	1,703,908	1,703,908	1,703,908		29,925,623	489,722	30,415,345
Maintenance -												
22	541	Main supv and engineering.....	1,967,876	-	1,967,876	70,356	70,356	70,356		2,038,232	64,589	2,102,821
23	542	Main of structures.....	1,155,653	-	1,155,653	40,462	40,462	40,462		1,196,115	28,310	1,224,425
24	543	Main of res.dams.waterwys.....	1,368,191	-	1,368,191	47,243	47,243	47,243		1,415,434	25,016	1,440,450
25	544	Main of electric plant.....	3,177,811	-	3,177,811	111,429	111,429	111,429		3,289,240	78,705	3,367,945
26	545	Main of misc hydro plant.....	3,029,473	-	3,029,473	106,310	106,310	106,310		3,135,783	76,527	3,212,310
27		Total maintenance.....	10,699,004	-	10,699,004	375,800	375,800	375,800		11,074,804	273,147	11,347,951
28		Total hydraulic power generation.....	38,923,658	(2,939)	38,920,719	2,079,708	2,079,708	2,079,708		41,000,427	762,869	41,763,296
Other power generation -												
Operation -												
29	546	Oper supv and engineering.....	328,417	-	328,417	11,785	11,785	11,785		340,202	11,348	351,550
30	547,000	Fuel - Salmon diesel.....	14,672	-	14,672	-	-	-		14,672	-	14,672
31	547	Fuel.....	-	-	-	-	-	-		-	-	-
32	548	Generation expenses.....	448,744	-	448,744	15,888	15,888	15,888		464,632	12,967	477,599
33	549	Misc other pwr gen exp.....	450,180	-	450,180	15,911	15,911	15,911		466,091	12,784	478,875
34	550	Rents.....	-	-	-	-	-	-		-	-	-
35		Total operation.....	1,242,013	-	1,242,013	43,584	43,584	43,584		1,285,597	37,099	1,322,696



IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
For Twelve Months Ended December 31, 2011

(1) LINE NO	(2) FERC ACCOUNT NUMBER	(3) DESCRIPTION	(4) 2010 Actuals	(5) 2010 Adjustments	(6) 2010 Base	(7) Forecast Methodology		(9) Forecast Adjustment	(10) 2011 Unadjusted Test Year	(11) Annualizing	(12) 2011 Test Year
						2010 Base	Other				
Other power generation - (continued)											
Maintenance -											
1	551	Main supp and engineering.....	\$ 43	\$ -	\$ 43	\$ -	\$ 1	\$ 1	\$ 44	\$ -	\$ 44
2	552	Main of structures.....	182,043	-	182,043	6,433	6,433	6,433	188,476	5,060	193,536
3	553	Main of gen and elec plt.....	118,533	-	118,533	4,209	4,209	4,209	122,742	3,509	126,251
4	554	Main misc oth pwr gen plt.....	1,077,264	-	1,077,264	1,294,436	1,294,436	1,294,436	2,371,700	14,064	2,385,764
5		Total maintenance.....	1,377,883	-	1,377,883	-	1,305,079	1,305,079	2,682,962	22,623	2,705,585
6		Total other power generation.....	2,619,896	-	2,619,896	1,348,663	1,348,663	1,348,663	3,968,559	59,722	4,028,281
Other power supply expenses -											
7	555,050	Purchased power - transmission losses.....	1,006,538	-	1,006,538	359,462	359,462	359,462	1,366,000	-	1,366,000
8	555	Purchased power.....	-	-	-	-	-	-	-	-	-
9	556	System cont and load disp.....	160	-	160	5	5	5	165	-	165
10	557	Other expenses - other power production.....	2,569,334	-	2,569,334	91,215	91,215	91,215	2,660,549	77,912	2,738,461
11	557	Other expenses - PCA, EPC and PCAM.....	-	-	-	-	-	-	-	-	-
12		Total other power supply expenses.....	3,576,032	-	3,576,032	450,682	450,682	450,682	4,026,714	77,912	4,104,626
13		Total power production expenses.....	92,851,261	(67,264)	92,783,997	12,162,529	12,162,529	12,162,529	104,946,526	911,460	105,857,986

IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
For Twelve Months Ended December 31, 2011

(1) LINE NO	(2) FERC ACCOUNT NUMBER	(3) DESCRIPTION	(4) 2010 Actuals	(5) 2010 Adjustments	(6) 2010 Base	(7) Forecast Methodology		(9) Forecast Adjustment	(10) 2011 Unadjusted Test Year	(11) Annualizing	(12) 2011 Test Year
						2010 Base	Other				
Transmission expenses:											
Operation -											
1	560	Oper supv and engineering.....	\$ 2,962,955	\$ (130)	\$ 2,992,825	\$ 104,884	\$ 104,884	\$ 104,884	\$ 3,097,709	\$ 74,228	\$ 3,171,937
2	561	Load dispatching.....	2,963,094	(76)	2,993,018	105,999	105,999	105,999	3,059,017	103,127	3,162,144
3	562	Station expenses.....	1,987,214	-	1,987,214	70,229	70,229	70,229	2,057,443	2,113,075	2,113,075
4	563	Overhead line expenses.....	660,035	-	660,035	2,386,852	2,386,852	2,386,852	3,046,887	12,886	3,059,773
5	564	Underground line expenses.....	-	-	-	-	-	-	-	-	-
6	565	Trans of elec by others.....	5,918,507	-	5,918,507	2,060,093	2,060,093	2,060,093	7,978,600	-	7,978,600
7	566	Misc trans expenses.....	336,835	-	336,835	11,205	11,205	11,205	348,040	1,179	349,219
8	567	Rents.....	1,569,168	-	1,569,168	612,921	612,921	612,921	2,182,089	-	2,182,089
9		Total operation.....	16,417,808	(206)	16,417,602	5,352,183	5,352,183	5,352,183	21,769,785	247,052	22,016,837
Maintenance -											
10	568	Main supv and engineering.....	540,340	-	540,340	18,248	18,248	18,248	558,588	5,065	563,653
11	569	Main of structures.....	419,219	-	419,219	14,897	14,897	14,897	434,116	12,604	446,720
12	570	Main of station equip.....	3,447,662	(9)	3,447,653	120,091	120,091	120,091	3,567,744	76,698	3,644,442
13	571	Main of overhead lines.....	2,781,245	(11)	2,781,245	94,398	94,398	94,398	2,875,643	33,042	2,908,685
14	573	Main of misc trans plant.....	(40)	(40)	-	(2)	(2)	(2)	(42)	-	(42)
15		Total maintenance.....	7,188,437	(20)	7,188,417	247,632	247,632	247,632	7,436,049	127,409	7,563,458
16		Total transmission expenses.....	23,606,245	(226)	23,606,019	5,599,815	5,599,815	5,599,815	29,205,834	374,461	29,580,295
Distribution expenses:											
Operation -											
17	580	Oper supv and engineering.....	3,713,391	(1,162)	3,712,229	132,086	132,086	132,086	3,844,315	111,849	3,956,164
18	581	Load dispatching.....	3,419,960	-	3,419,960	122,808	122,808	122,808	3,542,768	116,327	3,659,095
19	582	Station expenses.....	1,277,818	(100)	1,277,718	44,913	44,913	44,913	1,322,631	33,282	1,355,913
20	583	Overhead line expenses.....	3,029,340	(74)	3,029,266	107,642	107,642	107,642	3,136,908	97,101	3,234,009
21	584	Underground line expenses.....	1,792,342	(71)	1,792,271	61,166	61,166	61,166	1,853,437	25,348	1,878,785
22	585	St light and sgln sys exp.....	79,537	-	79,537	2,780	2,780	2,780	82,317	2,496	84,813
23	586	Meter expenses.....	4,219,271	(35)	4,219,236	25,493	25,493	25,493	4,244,729	-	4,244,729
24	587	Customer install expenses.....	1,521,427	(55)	1,521,372	53,651	53,651	53,651	1,575,023	41,458	1,616,481
25	588	Misc distribution exp.....	5,004,179	(605)	5,003,574	175,396	175,396	175,396	5,178,970	122,370	5,301,340
26	589	Rents.....	440,787	-	440,787	150,324	150,324	150,324	591,111	4	591,115
27		Total operation.....	24,498,052	(2,102)	24,495,950	876,259	876,259	876,259	25,372,209	550,235	25,922,444
Maintenance -											
28	590	Main supv and engineering.....	371,979	-	371,979	13,294	13,294	13,294	385,273	12,016	397,289
29	591	Main of structures.....	(11,385)	-	(11,385)	(376)	(376)	(376)	(11,761)	-	(11,761)
30	592	Main of station equip.....	3,774,610	(113)	3,774,497	131,767	131,767	131,767	3,906,377	86,662	3,993,039
31	593	Main of overhead lines.....	14,297,636	(7,433)	14,290,203	489,037	489,037	489,037	14,779,240	202,962	14,982,202
32	594	Main of underground lines.....	1,003,404	-	1,003,404	35,257	35,257	35,257	1,038,661	25,533	1,064,194
33	595	Main of line transformers.....	448,157	-	448,157	14,863	14,863	14,863	463,020	982	464,002
34	596	Main of st light-sgln sys.....	587,953	-	587,953	20,401	20,401	20,401	608,354	12,945	621,299
35	597	Main of meters.....	700,080	-	700,080	3,933	3,933	3,933	704,013	-	704,013
36	598	Main of misc dist plant.....	137,583	-	137,583	4,833	4,833	4,833	142,416	4,239	146,655
37		Total maintenance.....	21,310,130	(7,546)	21,302,584	713,009	713,009	713,009	22,015,593	345,339	22,360,932
38		Total distribution expenses.....	45,808,182	(9,648)	45,798,534	1,589,268	1,589,268	1,589,268	47,387,802	895,574	48,283,376

IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
For Twelve Months Ended December 31, 2011

(1) LINE NO	(2) FERC ACCOUNT NUMBER	(3) DESCRIPTION	(4) 2010 Actuals	(5) 2010 Adjustments	(6) 2010 Base	(7) Forecast Methodology 2010		(9) Forecast Adjustment	(10) 2011 Unadjusted Test Year	(11) Annualizing	(12) 2011 Test Year
						Base	Other				
Customer accounts expenses:											
1	901	Supervision.....	\$ 410,702	\$ (103)	\$ 410,599	\$ 14,722	\$ -	\$ 14,722	\$ 425,321	\$ 14,229	\$ 439,550
2	902	Meter reading expenses.....	4,026,937	-	4,026,937	(1,833,435)	-	(1,833,435)	2,193,502	-	2,193,502
3	903	Cust records - collect exp.....	12,988,730	(69)	12,988,661	450,982	-	450,982	13,439,643	273,279	13,712,922
4	904	Uncollectible accounts.....	4,638,855	-	4,638,855	-	-	-	4,638,855	-	4,638,855
5	905	Misc customer acctg exp.....	342	-	342	12	-	12	354	-	354
6		Total customer accounts expenses.....	22,065,566	(172)	22,065,394	(1,367,719)	-	(1,367,719)	20,697,675	287,508	20,985,183
Customer service and informational expenses:											
7	907	Supervision.....	352,778	(244)	352,534	12,606	-	12,606	365,140	11,052	376,192
8	908	Customer assistance exp.....	7,775,793	(3,127)	7,772,666	(1,352,887)	-	(1,352,887)	6,419,779	143,730	6,563,509
9	908	Energy efficiency rider - Idaho.....	42,479,689	(42,479,689)	-	-	-	-	-	-	-
10	908	Energy efficiency rider - Oregon.....	1,704,367	(1,704,367)	-	-	-	-	-	-	-
11	909	Info and instruct adv exp.....	31,517	-	31,517	1,040	-	1,040	32,557	-	32,557
12	910	Misc cust svc and inf exp.....	864,003	(329)	863,674	30,207	-	30,207	893,881	20,117	913,998
13	912	Demo and selling exp.....	-	-	-	-	-	-	-	-	-
14		Total customer service and informational expenses.....	53,208,147	(44,187,756)	9,020,391	(1,309,034)	-	(1,309,034)	7,711,357	174,899	7,886,256
Administrative and general expenses:											
Operation -											
15	920	Admin and gen salaries.....	47,261,758	(89)	47,261,669	1,703,947	-	1,703,947	48,965,616	1,616,018	50,581,634
16	920	Incentive.....	16,398,839	(16,398,839)	-	6,680,748	-	6,680,748	6,680,748	-	6,680,748
17	921	Office supplies and exp.....	13,613,991	(17,258)	13,596,733	1,300,867	-	1,300,867	14,897,600	7,681	14,905,281
18	922	Admin exp transf - cr.....	(27,799,634)	-	(27,799,634)	(998,665)	-	(998,665)	(28,798,299)	-	(28,798,299)
19	923	Outside services employed.....	7,210,630	(7,395)	7,203,235	237,808	-	237,808	7,441,043	-	7,441,043
20	924	Property insurance.....	3,329,577	-	3,329,577	5,031	-	5,031	3,334,608	21,166	3,355,774
21	925	Injuries and damages.....	5,668,380	-	5,668,380	187,461	-	187,461	5,855,841	6,440	5,862,281
22	926	Emp pensions and benefits - Oregon.....	25,926,077	(1,027)	25,925,050	618,379	-	618,379	26,543,429	-	26,543,429
23	926.203	Emp pensions and benefits - Oregon.....	884,236	-	884,236	8,788	-	8,788	893,024	-	893,024
24	926.204	Emp pensions and benefits - Idaho.....	3,159,800	-	3,159,800	13,993,913	-	13,993,913	17,153,713	-	17,153,713
25	926.205	Emp pensions and benefits - FERC.....	60,986	-	60,986	129,964	-	129,964	190,950	-	190,950
26	927	Franchise requirements.....	2,549	-	2,549	84	-	84	2,633	-	2,633
27	928	Reg commission expenses.....	3,797,837	(5,748)	3,792,089	440,932	-	440,932	4,233,021	-	4,233,021
28	929	Duplicate charges - cr.....	-	-	-	-	-	-	-	-	-
29	930.1	General advertising exp.....	417,950	(417,950)	-	-	-	-	-	-	-
30	930.2	Misc general expenses.....	3,826,102	(181,010)	3,645,092	140,403	-	140,403	3,785,495	5,263	3,790,748
31	931	Rents.....	12,600	-	12,600	12,588	-	12,588	25,188	-	25,188
32		Total operation.....	103,771,678	(17,029,316)	86,742,362	24,462,248	-	24,462,248	111,204,610	1,658,568	112,863,168
Maintenance -											
36	935	Main of general plant.....	4,182,611	(16)	4,182,595	145,593	-	145,593	4,328,188	42,431	4,370,619
34		Total maintenance.....	4,182,611	(16)	4,182,595	145,593	-	145,593	4,328,188	42,431	4,370,619
35		Total administrative and general expenses.....	107,954,289	(17,029,332)	90,924,957	24,607,841	-	24,607,841	115,532,798	1,700,989	117,233,787
36		Total electric operation and maintenance expenses.....	\$ 345,493,690	\$ (61,294,398)	\$ 284,199,292	\$ 41,282,700	\$ -	\$ 41,282,700	\$ 325,481,992	\$ 4,344,891	\$ 329,826,883

IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
PROPERTY INSURANCE - ACCOUNT 924  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment No	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					2010 Base	Other				
	Production - steam:									
1	Bridger plant.....	\$ 408,383	\$ -	\$ 408,383	\$ -	\$ -	-	\$ 408,383	\$ -	\$ 408,383
2	Boardman plant.....	49,753	-	49,753	-	-	-	49,753	-	49,753
3	Valmy plant.....	351,701	-	351,701	-	-	-	351,701	-	351,701
4	Total production - steam.....	809,837	-	809,837	-	-	-	809,837	-	809,837
	All risk:									
5	Blanket fidelity bond.....	63,170	-	63,170	-	-	-	63,170	-	63,170
6	Property "all risk".....	2,192,332	-	2,192,332	-	-	-	2,192,332	12,008	2,204,340
7	Other miscellaneous.....	264,238	-	264,238	5,031	5,031	-	269,269	9,158	278,427
8	Total all risk.....	2,519,740	-	2,519,740	5,031	5,031	-	2,524,771	21,166	2,545,937
9	Total property insurance.....	\$ 3,329,577	\$ -	\$ 3,329,577	\$ 5,031	\$ 5,031	<b>D</b>	\$ 3,334,608	\$ 21,166	\$ 3,355,774

IDAHO POWER COMPANY  
OPERATION AND MAINTENANCE EXPENSES  
REGULATORY COMMISSION EXPENSES - ACCOUNT 928  
For Twelve Months Ended December 31, 2011

(1) Line No.	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology 2010		(7) Other	(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					Base	Other					
1	FERC administrative assessments and securities (928.101) Capacity.....	\$ 1,661,164	\$ -	\$ 1,661,164	\$ 131,221		\$ 131,221	\$ 131,221	\$ 1,792,385	\$ -	\$ 1,792,385
2	Generation.....	706,272	-	706,272	55,791		55,791	55,791	762,063	-	762,063
3	Ferc Order #472 - Sales for resale.....	466,188	-	466,188	36,825		36,825	36,825	503,013	-	503,013
4	Miscellaneous Other.....	539,362	-	539,362	42,607		42,607	42,607	581,969	-	581,969
5	Total (928.101).....	3,372,986	-	3,372,986	266,444		266,444	266,444	3,639,430	-	3,639,430
6	FERC - Rate Case (928.102).....	704	-	704	23		23	23	727	-	727
7	FERC - Oregon Hydro (928.104).....	158,506	-	158,506	5,227		5,227	5,227	163,733	-	163,733
8	Total FERC expense.....	3,532,196	-	3,532,196	271,694		271,694	271,694	3,803,890	-	3,803,890
	Idaho Public Utilities Commission expense:										
9	Rate case (928.202).....	1,024	-	1,024	54,349		54,349	54,349	55,373	-	55,373
10	Other (928.203).....	31,419	(5,748)	25,671	42,077		42,077	42,077	67,748	-	67,748
11	Total IPUC expense.....	32,443	(5,748)	26,695	96,426		96,426	96,426	123,121	-	123,121
	Oregon Public Utility Commission expense:										
12	Filing Fees (928.301).....	-	-	-	-		-	-	-	-	-
13	Rate case (928.302).....	6,532	-	6,532	216		216	216	6,748	-	6,748
14	Other (928.303).....	226,666	-	226,666	72,596		72,596	72,596	299,262	-	299,262
15	Total OPUC expense.....	233,198	-	233,198	72,812		72,812	72,812	306,010	-	306,010
	Nevada Public Service Commission expense:										
16	Other (928.403).....	-	-	-	-		-	-	-	-	-
17	Total NPSC expense.....	-	-	-	-		-	-	-	-	-
18	Total regulatory commission expenses.....	\$ 3,797,837	\$ (5,748)	\$ 3,792,089	\$ 440,932		\$ 440,932	\$ 440,932	\$ 4,233,021	\$ -	\$ 4,233,021

IDAHO POWER COMPANY  
DEPRECIATION AND AMORTIZATION EXPENSE  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					2010 Base	Other				
Accounts 403 and 404:										
1	Amortization expense.....	\$ 6,857,301	\$ -	\$ 6,857,301	\$ 184,774	\$ 184,774	\$ 184,774	\$ 7,042,075	\$ 189,455	\$ 7,231,530
2	Depreciation expense.....	109,099,197	-	109,099,197	4,789,543	4,789,543	4,789,543	113,888,740	2,225,161	116,113,901
3	Total.....	\$ 115,956,498	\$ -	\$ 115,956,498	\$ 4,974,317	\$ 4,974,317	\$ 4,974,317	\$ 120,930,815	\$ 2,414,616	\$ 123,345,431

IDAHO POWER COMPANY  
ELECTRIC PLANT/REGULATORY ASSETS - AMORT., ADJUST., GAINS & LOSSES  
For Twelve Months Ended December 31, 2011

(1) Line No	(2)	(3) Description	(4) 2010 Actuals	(5) 2010 Adjustments	(6) 2010 Base	(7) Forecast Methodology 2010		(9) Forecast Adjustment	(10) 2011 Unadjusted Test Year	(11) Annualizing	(12) 2011 Test Year
						Base	Other				
1	406	Amortization of electric plant acquisition adjustment - Prairie Power.....	\$ (22,723)	\$ -	\$ (22,723)	\$ -	\$ -	\$ -	\$ (22,723)	\$ -	\$ (22,723)
2		Total.....	\$ (22,723)	\$ -	\$ (22,723)	\$ -	\$ -	<b>F</b>	\$ (22,723)	\$ -	\$ (22,723)

IDAHO POWER COMPANY  
REGULATORY DEBITS AND CREDITS  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology 2010		(7) Other	(8) Forecast Adjustment	Ref No	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					Base	Other						
Regulatory Debits/Credits (Acct 407.3/407.4):												
1	Amortization of Oregon deferred pension.....	\$ 21,955	\$ -	\$ 21,955	\$ 5,802	\$ 5,802	\$ 5,802	\$ 5,802		\$ 27,757	\$ -	\$ 27,757
2	Total.....	\$ 21,955	\$ -	\$ 21,955	\$ 5,802	\$ 5,802	\$ 5,802	\$ 5,802	<b>G</b>	\$ 27,757	\$ -	\$ 27,757



IDAHO POWER COMPANY  
TAXES OTHER THAN INCOME TAXES  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) 2010 Base	(7) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
						Base	Other				
	Federal taxes:										
1	Unemployment.....	\$ 120,285	\$ (120,285)		YES				\$ -		\$ -
2	Social Security .....	12,457,819	(12,457,819)		YES				-		-
3	Total federal taxes.....	12,578,104	(12,578,104)						-		-
	State, county and local taxes:										
	Real and personal property:										
4	Idaho.....	14,864,080	-	14,864,080		2,655,853		2,655,853	17,519,933		17,519,933
5	Oregon.....	2,228,127	-	2,228,127		162,507		162,507	2,390,634		2,390,634
6	Montana.....	210,443	-	210,443		14,557		14,557	225,000		225,000
7	Wyoming.....	1,271,134	-	1,271,134		228,866		228,866	1,500,000		1,500,000
8	Nevada.....	1,108,774	-	1,108,774		(15,571)		(15,571)	1,093,203		1,093,203
9	Shoshone-Bannock.....	70,533	-	70,533		1,058		1,058	71,591		71,591
10	Total real and personal property.....	19,753,091	-	19,753,091		3,047,270		3,047,270	22,800,361		22,800,361
11	Kilowatt-hour tax - Idaho.....	1,645,778	-	1,645,778		390,851		390,851	2,036,629		2,036,629
	Licenses:										
12	Wyoming.....	3,950	-	3,950		730		730	4,680		4,680
13	Shoshone-Bannock.....	300	-	300		(150)		(150)	150		150
14	Total licenses.....	4,250	-	4,250		580		580	4,830		4,830
	Regulatory commission:										
15	Idaho.....	1,837,184	-	1,837,184	YES				1,837,184		1,837,184
16	Oregon.....	92,603	-	92,603		48,339		48,339	140,942		140,942
17	Total regulatory commission.....	1,929,787	-	1,929,787		48,339		48,339	1,978,126		1,978,126
	Franchise:										
18	Oregon total franchise.....	713,129	-	713,129		(32,970)		(32,970)	680,159		680,159
19	Unemployment - total state.....	1,108,246	(1,108,246)	-	YES				-		-
20	Total state, county and local taxes.....	25,154,281	(1,108,246)	24,046,035		3,454,070		3,454,070	27,500,105		27,500,105
21	Total other taxes.....	37,732,385	(13,686,350)	24,046,035		3,454,070		3,454,070	27,500,105		27,500,105
22	Less: State & Fed P/R Loading Reversal.....	(13,686,350)	13,686,350	-		-		-	-		-
23	Net other taxes.....	\$ 24,046,035	\$ -	\$ 24,046,035		\$ 3,454,070		\$ 3,454,070	\$ 27,500,105		\$ 27,500,105

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IDAHO POWER COMPANY  
STATEMENT OF INCOME  
FOR IDAHO ENERGY RESOURCES COMPANY  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					2010 Base	Other				
	Income:									
1	Bridger Coal Company - joint venture.....	\$ 11,280,852	\$ -	\$ 11,280,852	\$ (1,080,852)	\$ (1,080,852)	\$ (1,080,852)	\$ 10,200,000	\$ -	\$ 10,200,000
2	Bridger Coal Company - overriding royalties.....	66,342	-	66,342	7,644	7,644	7,644	73,986	-	73,986
3	Interest and dividend income.....	189,847	-	189,847	(189,847)	(189,847)	(189,847)	-	-	-
4	Taxes Other than Income Taxes.....	-	-	-	-	-	-	-	-	-
5	Total income.....	11,537,041	-	11,537,041	(1,263,055)	(1,263,055)	(1,263,055)	10,273,986	-	10,273,986
	Expenses:									
6	Operation expense.....	66,551	-	66,551	7,437	7,437	7,437	73,988	-	73,988
7	Income taxes.....	3,879,289	-	3,879,289	(341,975)	(341,975)	(341,975)	3,537,314	-	3,537,314
8	Provision for deferred income taxes.....	-	-	-	-	-	-	-	-	-
9	Intercompany interest expense.....	44,869	-	44,869	48,519	48,519	48,519	93,388	-	93,388
10	Interest expense.....	-	-	-	-	-	-	-	-	-
11	Total expenses.....	3,990,709	-	3,990,709	(286,019)	(286,019)	(286,019)	3,704,690	-	3,704,690
12	Net income from operations.....	7,546,332	-	7,546,332	(977,036)	(977,036)	(977,036)	6,569,296	-	6,569,296
13	Add: Interest expense from notes payable to parent (Net of Tax).....	29,165	-	29,165	31,537	31,537	31,537	60,702	-	60,702
14	Net income (earnings to Idaho Power Company).....	\$ 7,575,497	\$ -	\$ 7,575,497	\$ (945,499)	\$ (945,499)	\$ (945,499)	\$ 6,629,998	\$ -	\$ 6,629,998

IDAHO POWER COMPANY  
ELECTRIC PLANT IN SERVICE (Excluding ARO Entries)  
For The Thirteen Months Ended December 31, 2011

(1) Line No	(2) Month	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					2010 Base	Other				
1	December, 2009	\$ 4,156,814,543	\$ -	\$ 4,156,814,543	\$ 171,590,192	\$ -	\$ 171,590,192	\$ 4,328,404,735	\$ -	\$ 4,328,404,735
2	January, 2010	4,157,393,363	-	4,157,393,363	179,893,941	-	179,893,941	4,337,287,304	-	4,337,287,304
3	February	4,166,176,103	-	4,166,176,103	178,642,613	-	178,642,613	4,344,818,716	-	4,344,818,716
4	March	4,173,719,800	-	4,173,719,800	183,780,037	-	183,780,037	4,357,499,837	-	4,357,499,837
5	April	4,173,092,585	-	4,173,092,585	193,221,544	-	193,221,544	4,366,314,129	-	4,366,314,129
6	May	4,187,044,366	-	4,187,044,366	186,692,379	-	186,692,379	4,373,736,745	-	4,373,736,745
7	June	4,208,744,445	-	4,208,744,445	195,910,323	-	195,910,323	4,404,654,768	-	4,404,654,768
8	July	4,276,133,715	-	4,276,133,715	142,329,428	-	142,329,428	4,418,463,143	-	4,418,463,143
9	August	4,281,315,297	-	4,281,315,297	144,269,264	-	144,269,264	4,425,584,561	-	4,425,584,561
10	September	4,288,337,511	-	4,288,337,511	149,514,697	-	149,514,697	4,437,852,208	-	4,437,852,208
11	October	4,300,535,064	-	4,300,535,064	145,631,296	-	145,631,296	4,446,166,360	-	4,446,166,360
12	November	4,310,090,611	-	4,310,090,611	147,047,274	-	147,047,274	4,457,137,885	-	4,457,137,885
13	December	4,328,404,735	-	4,328,404,735	137,815,481	-	137,815,481	4,466,220,216	-	4,466,220,216
14	Average	\$ 4,231,369,395	\$ -	\$ 4,231,369,395	\$ 165,872,190	\$ -	\$ 165,872,190	\$ 4,397,241,565	\$ -	\$ 4,397,241,565

IDAHO POWER COMPANY  
ACCUMULATED PROVISION FOR DEPRECIATION (Excluding ARO Entries)  
For The Thirteen Months Ended December 31, 2011

(1) Line No	(2) Month	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) 2010 Forecast Methodology		(7) Other	(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					Base	Other					
1	December, 2009.....	\$ 1,690,985,018	\$ -	\$ 1,690,985,018	\$ 57,281,530	\$ -	\$ 57,281,530	\$ 57,281,530	\$ 1,748,266,548	\$ -	\$ 1,748,266,548
2	January, 2010.....	1,698,964,538	-	1,698,964,538	56,700,560	-	56,700,560	56,700,560	1,755,665,098	-	1,755,665,098
3	February.....	1,706,470,899	-	1,706,470,899	57,251,316	-	57,251,316	57,251,316	1,763,722,215	-	1,763,722,215
4	March.....	1,703,526,938	-	1,703,526,938	67,292,711	-	67,292,711	67,292,711	1,770,819,649	-	1,770,819,649
5	April.....	1,711,432,889	-	1,711,432,889	68,047,828	-	68,047,828	68,047,828	1,779,480,717	-	1,779,480,717
6	May.....	1,719,152,114	-	1,719,152,114	69,071,412	-	69,071,412	69,071,412	1,788,223,526	-	1,788,223,526
7	June.....	1,723,610,925	-	1,723,610,925	63,847,320	-	63,847,320	63,847,320	1,787,468,245	-	1,787,468,245
8	July.....	1,732,507,865	-	1,732,507,865	57,282,575	-	57,282,575	57,282,575	1,789,790,440	-	1,789,790,440
9	August.....	1,737,927,039	-	1,737,927,039	60,348,446	-	60,348,446	60,348,446	1,798,275,485	-	1,798,275,485
10	September.....	1,740,051,390	-	1,740,051,390	65,390,714	-	65,390,714	65,390,714	1,805,442,104	-	1,805,442,104
11	October.....	1,749,452,287	-	1,749,452,287	64,831,894	-	64,831,894	64,831,894	1,814,284,181	-	1,814,284,181
12	November.....	1,756,647,651	-	1,756,647,651	65,818,973	-	65,818,973	65,818,973	1,822,466,624	-	1,822,466,624
13	December.....	1,748,266,548	-	1,748,266,548	75,425,552	-	75,425,552	75,425,552	1,823,692,100	-	1,823,692,100
14	Average.....	\$ 1,724,538,162	\$ -	\$ 1,724,538,162	\$ 63,737,756	\$ -	\$ 63,737,756	\$ 63,737,756	\$ 1,786,275,918	\$ -	\$ 1,786,275,918

IDAHO POWER COMPANY  
ACCUMULATED PROVISION FOR AMORTIZATION (Excluding ARO Entries)  
OF ELECTRIC UTILITY PLANT  
For The Thirteen Months Ended December 31, 2011

(1) Line No	(2) Month	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Normalizing	(11) 2011 Test Year
					2010 Base	Other				
1	December, 2009.....	\$ 21,016,304	\$ -	\$ 21,016,304	\$ 320,750	\$ 320,750	\$ 320,750	\$ 21,337,054	\$ -	\$ 21,337,054
2	January, 2010.....	15,125,898	-	15,125,898	2,908,400	2,908,400	2,908,400	18,034,298	-	18,034,298
3	February.....	15,663,602	-	15,663,602	2,929,379	2,929,379	2,929,379	18,592,981	-	18,592,981
4	March.....	16,200,021	-	16,200,021	2,953,169	2,953,169	2,953,169	19,153,190	-	19,153,190
5	April.....	16,692,826	-	16,692,826	3,030,713	3,030,713	3,030,713	19,723,539	-	19,723,539
6	May.....	17,288,012	-	17,288,012	3,009,056	3,009,056	3,009,056	20,297,068	-	20,297,068
7	June.....	17,838,478	-	17,838,478	3,035,303	3,035,303	3,035,303	20,873,781	-	20,873,781
8	July.....	18,418,420	-	18,418,420	3,045,798	3,045,798	3,045,798	21,464,218	-	21,464,218
9	August.....	18,999,998	-	18,999,998	3,056,650	3,056,650	3,056,650	22,056,648	-	22,056,648
10	September.....	19,583,801	-	19,583,801	3,067,976	3,067,976	3,067,976	22,651,777	-	22,651,777
11	October.....	20,167,606	-	20,167,606	3,084,466	3,084,466	3,084,466	23,252,072	-	23,252,072
12	November.....	20,752,330	-	20,752,330	3,100,481	3,100,481	3,100,481	23,852,811	-	23,852,811
13	December.....	21,337,054	-	21,337,054	3,118,385	3,118,385	3,118,385	24,455,439	-	24,455,439
14	Average.....	\$ 18,391,104	\$ -	\$ 18,391,104	\$ 2,820,040	\$ 2,820,040	\$ 2,820,040	\$ 21,211,144	\$ -	\$ 21,211,144

IDAHO POWER COMPANY  
MATERIALS AND SUPPLIES  
For The Thirteen Months Ended December 31, 2011

(1) Line No.	(2) Month	(3)		(4) 2010 Actuals Account 163	(5) Total	(6) 2010 Adjustments	(7) 2010 Base	(8) Forecast Methodology 2010		(9) Other	(10) Forecast Adjustment	(11) 2011 Unadjusted Test Year	(12) Annualizing	(13) 2011 Test Year
		Account 154	Account 163					Base	Other					
1	December, 2009.....	\$ 43,342,060	\$ 4,711,966	\$ 48,054,026	\$ -	\$ 48,054,026	\$ (2,453,105)	\$ (2,453,105)	\$ -	\$ 45,600,921	\$ -	\$ 45,600,921		
2	January, 2010.....	43,921,795	4,787,486	48,709,281	-	48,709,281	(2,826,338)	(2,826,338)	-	45,882,943	-	45,882,943		
3	February.....	43,770,175	5,619,898	49,390,073	-	49,390,073	(3,731,364)	(3,731,364)	-	45,658,709	-	45,658,709		
4	March.....	43,124,506	4,410,396	47,534,902	-	47,534,902	(1,747,901)	(1,747,901)	-	45,787,001	-	45,787,001		
5	April.....	42,740,511	4,337,104	47,077,615	-	47,077,615	(1,162,321)	(1,162,321)	-	45,915,294	-	45,915,294		
6	May.....	43,088,560	4,254,186	47,342,746	-	47,342,746	(1,299,160)	(1,299,160)	-	46,043,586	-	46,043,586		
7	June.....	43,017,520	4,418,433	47,435,953	-	47,435,953	(1,264,074)	(1,264,074)	-	46,171,879	-	46,171,879		
8	July.....	41,900,492	4,064,137	45,964,629	-	45,964,629	335,542	335,542	-	46,300,171	-	46,300,171		
9	August.....	42,146,520	3,943,399	46,089,919	-	46,089,919	338,545	338,545	-	46,428,464	-	46,428,464		
10	September.....	41,479,326	3,851,381	45,330,707	-	45,330,707	1,226,049	1,226,049	-	46,556,756	-	46,556,756		
11	October.....	42,278,796	3,638,161	45,916,957	-	45,916,957	851,425	851,425	-	46,768,382	-	46,768,382		
12	November.....	41,862,927	3,518,161	45,381,088	-	45,381,088	1,598,920	1,598,920	-	46,980,008	-	46,980,008		
13	December.....	42,221,176	3,379,745	45,600,921	-	45,600,921	1,590,713	1,590,713	-	47,191,634	-	47,191,634		
14	Average.....	\$ 42,684,162	\$ 4,225,727	\$ 46,909,909	\$ -	\$ 46,909,909	\$ (657,159)	\$ (657,159)	\$ -	\$ 46,252,750	\$ -	\$ 46,252,750		

IDAHO POWER COMPANY  
OTHER DEFERRED PROGRAMS  
At December 31, 2011

(1) Line No	(2) Description	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(7) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					(6) 2010 Base	Other				
Idaho Public Utilities Commission:										
	Account 186									
1	American Falls Bond Refinancing - (PUC Order 25880)	\$ 886,145	\$ -	\$ 886,145	\$ (62,552)	\$ (62,552)	\$ (62,552)	\$ 823,593	\$ -	\$ 823,593
Account 182										
2	Intervenor Funding - CAPAI (PUC Order 30722)	10,572	-	10,572	(10,572)	(10,572)	(10,572)	-	-	-
3	Intervenor Funding - Idaho Irrigators (PUC Order 30722)	35,480	-	35,480	(35,480)	(35,480)	(35,480)	-	-	-
Oregon Public Utilities Commission:										
4	Citizen Utility Board 2010 Fund Grant - (OPUC Order 10-406)	30,100	-	30,100	(30,100)	(30,100)	(30,100)	-	-	-
5	SFAS 87 Capitalized Pension Costs - (OPUC Order 10-064)	939,890	-	939,890	383,271	383,271	383,271	1,323,161	-	1,323,161
6	Grid West Loans - (OPUC Order 06-483)	59,128	-	59,128	(14,191)	(14,191)	(14,191)	44,937	-	44,937
Federal Energy Regulatory Commission:										
7	Grid West Loans	195,524	-	195,524	(83,796)	(83,796)	(83,796)	111,728	-	111,728
8	Total	\$ 2,156,839	\$ -	\$ 2,156,839	\$ 146,580	\$ 146,580	\$ 146,580	\$ 2,303,419	\$ -	\$ 2,303,419

**IDAHO POWER COMPANY  
2011 RATE CASE  
ACCUMULATED DEFERRED INCOME TAXES**

	Balance Dec 31, 2010	2011 Change	Balance Dec 31, 2011	Average 2010- 2011
<b><u>ACCOUNT 190 - ACCUM DEF INC TAXES:</u></b>				
004003-CONSTRUCTION ADV-252	7,061,284	(1,884,474)	5,176,810	6,119,047
004022-FERC CREDIT OFA-ACCT 254	182,023	(182,023)	0	91,012
005010-SFAS 112-POST-EMPLY BEN 182/253	1,504,637	0	1,504,637	1,504,637
005033-NONVEBA PEN&BEN-Acct 228	414,233	0	414,233	414,233
005047-OTHER EMPLOYEE'S LT DEFERRED COMP-228	1,855,362	(451,156)	1,404,206	1,629,784
005053-FAS 123R-STOCK BASED COMPENSATION	2,496,071	0	2,496,071	2,496,071
005061-PENSION EXPENSE-OREGON	817,275	359,980	1,177,255	997,265
005531-RATE CASE DISALLOWANCES-REVERSE AMORT	2,765,194	(115,840)	2,649,354	2,707,274
008001-VEBA-POST RET BNFTS-TRUST-ACCT 228	5,658,260	952,818	6,611,078	6,134,669
<b>TOTAL 190</b>	<b>22,754,339</b>	<b>(1,320,695)</b>	<b>21,433,644</b>	<b>22,093,992</b>
<b><u>ACCOUNT 282 - ACCUM DEF INC TAXES - OTHER PROPERTY:</u></b>				
LIBERALIZED DEPR - ELECTRIC PLANT	(271,486,740)	(45,400,066)	(316,886,806)	(294,186,773)
N VALMY PARTNERSHIP CAPITALIZED ITEMS	(427,766)	76,500	(351,266)	(389,516)
<b>TOTAL 282</b>	<b>(271,914,506)</b>	<b>(45,323,566)</b>	<b>(317,238,072)</b>	<b>(294,576,289)</b>
<b><u>ACCOUNT 283 - ACCUM DEF INC TAXES - OTHER:</u></b>				
004501-ROYALTY INCOME	(293,553)	0	(293,553)	(293,553)
005023-PENSION EXPENSE-IDAHO & FERC	(22,197,834)	6,819,094	(15,378,740)	(18,788,287)
005048-BONUS DEFERRAL-ACCT 232	(515)	0	(515)	(515)
005054-IPUC GRID WEST LOANS-ACCT 182	(72,888)	72,888	0	(36,444)
005055-OPUC GRID WEST LOANS-ACCT 182	(23,115)	5,547	(17,568)	(20,342)
005056-FERC GRID WEST EXP-ACCT 182	(76,441)	32,760	(43,681)	(60,061)
005057-INTERVENOR FUNDING ORDERS-ACCT 182	(47,339)	47,339	0	(23,670)
005532-DELIVERY ACCRUALS-ACCT 253	(15,266)	0	(15,266)	(15,266)
008057-REORGANIZATION COSTS-ACCT 182	(360,700)	90,176	(270,524)	(315,612)
<b>TOTAL 283</b>	<b>(23,087,651)</b>	<b>7,067,804</b>	<b>(16,019,847)</b>	<b>(19,553,750)</b>
<b>TOTAL DEFERRED TAX BALANCES</b>	<b>(272,247,818)</b>	<b>(39,576,457)</b>	<b>(311,824,275)</b>	<b>(292,036,047)</b>

Deferred Tax Expense without ITC - 410 / 411	39,576,457
ITC Deferred Tax Expense - 411.4	(470,989)
Total Deferred Tax Expense	<u>39,105,468</u>



IDAHO POWER COMPANY  
CUSTOMER ADVANCES FOR CONSTRUCTION  
For The Thirteen Months Ended December 31, 2011

(1) Line No	(2) Month	(3) 2010 Actuals	(4) 2010 Adjustments	(5) 2010 Base	(6) Forecast Methodology		(8) Forecast Adjustment	(9) 2011 Unadjusted Test Year	(10) Annualizing	(11) 2011 Test Year
					2010 Base	Other				
1	December, 2009.....	\$ 25,180,988	\$ -	\$ 25,180,988	\$ (6,034,061)	\$ (6,034,061)	\$ (6,034,061)	\$ 19,146,937	\$ -	\$ 19,146,937
2	January, 2010.....	24,698,698	-	24,698,698	(5,799,110)	(5,799,110)	(5,799,110)	18,899,588	-	18,899,588
3	February.....	24,306,094	-	24,306,094	(5,939,591)	(5,939,591)	(5,939,591)	18,366,503	-	18,366,503
4	March.....	23,326,546	-	23,326,546	(5,298,114)	(5,298,114)	(5,298,114)	18,028,432	-	18,028,432
5	April.....	23,993,449	-	23,993,449	(6,311,561)	(6,311,561)	(6,311,561)	17,681,888	-	17,681,888
6	May.....	23,842,449	-	23,842,449	(6,420,582)	(6,420,582)	(6,420,582)	17,421,867	-	17,421,867
7	June.....	23,296,869	-	23,296,869	(6,147,375)	(6,147,375)	(6,147,375)	17,149,494	-	17,149,494
8	July.....	22,991,687	-	22,991,687	(5,860,206)	(5,860,206)	(5,860,206)	17,131,481	-	17,131,481
9	August.....	22,552,101	-	22,552,101	(5,820,649)	(5,820,649)	(5,820,649)	16,731,452	-	16,731,452
10	September.....	21,909,249	-	21,909,249	(5,507,016)	(5,507,016)	(5,507,016)	16,402,233	-	16,402,233
11	October.....	23,805,152	-	23,805,152	(7,796,760)	(7,796,760)	(7,796,760)	16,008,392	-	16,008,392
12	November.....	23,400,419	-	23,400,419	(7,597,138)	(7,597,138)	(7,597,138)	15,803,281	-	15,803,281
13	December.....	23,054,016	-	23,054,016	(7,425,632)	(7,425,632)	(7,425,632)	15,628,384	-	15,628,384
14	Average.....	\$ 23,565,979	\$ -	\$ 23,565,979	\$ (6,304,446)	\$ (6,304,446)	\$ (6,304,446)	\$ 17,261,533	\$ -	\$ 17,261,533

IDAHO POWER COMPANY  
IERCO - SUBSIDIARY RATE BASE COMPONENTS  
For The Thirteen Months Ended December 31, 2011

(1) Line No	(2) Month	(3) Investment	(4) 2010 Actuals		(5) Notes Rec from Subsidiary	(6) Total	(7) 2010 Adjustments	(8) 2010 Base	(9) Forecast Methodology		(11) Forecast Adjustment	(12) 2011 Unadjusted Test Year	(13) Annualizing	(14) 2011 Test Year
			(4) Advance Coal Royalties	(4) Notes Rec from Subsidiary					(9) Base	(10) Other				
1	December, 2009.....	\$ 65,015,441	\$ 1,507,205	\$ 18,894,101	\$ 85,416,747	\$ (85,531)	\$ 85,331,216	\$ 2,963,173	\$ 2,963,173	2,963,173	\$ 88,294,389	\$ -	\$ 88,294,389	
2	January, 2010.....	63,973,426	1,499,561	21,095,921	86,568,908	(85,531)	86,483,377	1,169,298	1,169,298	1,169,298	87,652,675	-	87,652,675	
3	February.....	64,975,377	1,495,220	20,747,697	87,218,294	(85,531)	87,132,763	(1,069,941)	(1,069,941)	(1,069,941)	86,062,822	-	86,062,822	
4	March.....	65,361,104	1,474,739	20,579,057	87,414,900	(85,531)	87,329,369	(2,575,652)	(2,575,652)	(2,575,652)	84,753,717	-	84,753,717	
5	April.....	65,432,902	1,471,734	20,302,131	87,206,767	(85,531)	87,121,236	(1,02,806)	(1,02,806)	(1,02,806)	87,018,430	-	87,018,430	
6	May.....	66,423,016	1,460,137	21,845,196	89,728,349	(85,531)	89,642,818	(1,005,031)	(1,005,031)	(1,005,031)	88,637,787	-	88,637,787	
7	June.....	66,643,635	1,460,794	22,317,896	90,422,325	(85,531)	90,336,794	664,044	664,044	664,044	91,000,838	-	91,000,838	
8	July.....	67,829,910	1,455,791	23,423,835	92,709,536	(85,531)	92,624,005	(1,501,926)	(1,501,926)	(1,501,926)	91,122,079	-	91,122,079	
9	August.....	68,522,619	1,450,728	21,129,029	91,102,376	(85,531)	91,016,845	256,183	256,183	256,183	91,273,028	-	91,273,028	
10	September.....	70,184,541	1,446,260	20,796,633	92,427,434	(85,531)	92,341,903	(1,072,320)	(1,072,320)	(1,072,320)	91,269,583	-	91,269,583	
11	October.....	70,410,295	1,443,426	17,899,998	89,753,719	(85,531)	89,668,188	852,399	852,399	852,399	90,520,587	-	90,520,587	
12	November.....	71,235,047	1,437,825	15,032,039	87,704,911	(85,531)	87,619,380	1,722,880	1,722,880	1,722,880	89,342,260	-	89,342,260	
13	December.....	72,561,774	1,433,219	14,384,928	88,379,921	(85,531)	88,294,390	1,703,385	1,703,385	1,703,385	89,997,775	-	89,997,775	
14	Average.....	\$ 67,582,237	\$ 1,464,357	\$ 19,880,651	\$ 88,927,245	\$ (85,531)	\$ 88,841,714	\$ 154,130	\$ 154,130	\$ 154,130	\$ 88,995,844	\$ -	\$ 88,995,844	

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Douglas N. Jones  
Deductions from Operations and Maintenance Expenses

July 29, 2011



IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
MEMBERSHIPS AND CONTRIBUTIONS  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Acct No	(3) Organization	(4) Contributions		(5) Actual	(6) Memberships		(7) 2010 Actuals	(8) 2010 Adjustments
			100%	100%	33.33%	100%			
1	537	Edison Electric Institute.....	\$ -	\$ -	\$ 833	\$ -	\$ -	833	\$ (833)
2	537	Lower Boise Watershed Council.....	1,000	-	-	-	-	1,000	(1,000)
3	537	Treasure Valley Chapter.....	300	-	-	-	-	300	(300)
4	539	Hells Canyon Riders Donation.....	312	-	-	-	-	312	(312)
5	560	Edison Electric Institute.....	-	-	11	-	-	11	(11)
6	580	National Arbor Day.....	309	-	-	-	-	309	(309)
7	580	Donation.....	4	-	-	-	-	4	(4)
8	580	Magic Valley Adult Leadership, Chamber of Commerce.....	-	-	107	-	-	107	(107)
9	580	Chamber of Commerce Pocatello.....	-	-	217	-	-	217	(217)
10	582	Rimrock Community Food Bank.....	100	-	-	-	-	100	(100)
11	586	Rotary Club Pocatello.....	-	-	20	-	-	20	(20)
12	588	Chamber of Commerce Boise Metro.....	-	-	7	-	-	7	(7)
13	588	Rotary Club McCall.....	-	-	133	-	-	133	(133)
14	588	Edison Electric Institute.....	-	-	217	-	-	217	(217)
15	588	City Club of Boise.....	-	-	3	-	-	3	(3)
16	593	National Arbor Day.....	7,309	-	-	-	-	7,309	(7,309)
17	907	Rotary Club Pocatello.....	-	-	244	-	-	244	(244)
18	908	Association of Idaho Cities.....	-	-	233	-	-	233	(233)
19	908	Chamber of Commerce.....	-	-	10	-	-	10	(10)
20	908	Chamber of Commerce Boise Metro.....	-	-	127	-	-	127	(127)
21	908	Chamber of Commerce Mountain Home.....	-	-	17	-	-	17	(17)
22	908	Chamber of Commerce Homedale.....	-	-	20	-	-	20	(20)
23	908	Chamber of Commerce Nampa.....	-	-	210	-	-	210	(210)
24	908	Donation.....	6	-	-	-	-	6	(6)
25	908	Edison Electric Institute.....	-	-	132	-	-	132	(132)
26	908	Chamber of Commerce Greater Pocatello.....	-	-	17	-	-	17	(17)
27	908	Kiwanis Club Eagle.....	-	-	77	-	-	77	(77)
28	908	Kiwanis Club Les Bois.....	-	-	283	-	-	283	(283)
29	908	KMTV TV Ag Show Booth.....	-	-	925	-	-	925	(925)
30	908	Lions Club Idaho City.....	-	-	33	-	-	33	(33)
31	908	Lions Club Jordan Valley.....	-	-	10	-	-	10	(10)
32	908	Lions Club Twin Falls.....	-	-	136	-	-	136	(136)
33	908	Rotary Club.....	-	-	34	-	-	34	(34)
34	908	Rotary Club Boise.....	-	-	221	-	-	221	(221)
35	908	Rotary Club Boise Centennial.....	-	-	270	-	-	270	(270)
36	908	Rotary Club Caldwell.....	-	-	85	-	-	85	(85)
37	910	Donation.....	15	-	-	-	-	15	(15)
38	910	Rotary Club Blackfoot.....	-	-	183	-	-	183	(183)
39	910	Rotary Club Gate City.....	-	-	84	-	-	84	(84)
40	921	Association of Idaho Cities.....	-	-	47	-	-	47	(47)
41	921	City Club of Boise.....	-	-	30	-	-	30	(30)
42	921	Edison Electric Institute.....	-	-	3,575	-	-	3,575	(3,575)
43	921	Chamber of Commerce North Idaho Legislative.....	2,500	-	-	-	-	2,500	(2,500)
44	921	Idaho Watercolor Society Sponsorship.....	300	-	-	-	-	300	(300)
45	921	Rotary Club of Boise - Sunrise.....	-	-	164	-	-	164	(164)
46	921	Chamber of Commerce Boise Metro.....	-	-	17	-	-	17	(17)

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
MEMBERSHIPS AND CONTRIBUTIONS  
For Twelve Months Ended December 31, 2011

(1) Line No	(2) Acct No	(3) Organization	(4)		(5)	(6)	(7)	(8)
			Contributions 100%	Actual 33.33%	Memberships 100%	Actuals	Adjustments	
47	930	American Planning Association of Idaho.....	500	-	-	500	(500)	
48	930	Associated Tax Payers of Idaho.....	-	-	21,252	21,252	(21,252)	
49	930	Association of Idaho Cities.....	-	1,083	-	1,083	(1,083)	
50	930	Chamber of Commerce Baker County.....	-	328	-	328	(328)	
51	930	Castleford Men's Club Contribution.....	-	-	20	20	(20)	
52	930	Chamber of Commerce.....	-	3,445	-	3,445	(3,445)	
53	930	Chamber of Commerce Idaho City.....	-	33	-	33	(33)	
54	930	Chamber of Commerce Blackfoot.....	-	8	-	8	(8)	
55	930	Chamber of Commerce Boise.....	-	4,240	-	4,240	(4,240)	
56	930	Chamber of Commerce Boise Metro.....	-	4,363	-	4,363	(4,363)	
57	930	Chamber of Commerce Caldwell.....	-	333	-	333	(333)	
58	930	Chamber of Commerce Hailey.....	-	238	-	238	(238)	
59	930	Chamber of Commerce Jerome.....	-	142	-	142	(142)	
60	930	Chamber of Commerce Eagle.....	-	158	-	158	(158)	
61	930	Chamber of Commerce Lincoln County.....	-	33	-	33	(33)	
62	930	Chamber of Commerce Buhl.....	-	158	-	158	(158)	
63	930	Chamber of Commerce Gem County.....	-	150	-	150	(150)	
64	930	Chamber of Commerce Hagerman.....	-	83	-	83	(83)	
65	930	Chamber of Commerce Idaho Falls.....	-	75	-	75	(75)	
66	930	Chamber of Commerce Kuna.....	-	333	-	333	(333)	
67	930	Chamber of Commerce McCall.....	-	332	-	332	(332)	
68	930	Chamber of Commerce Meridian.....	-	441	-	441	(441)	
69	930	Chamber of Commerce Mountain Home.....	-	67	-	67	(67)	
70	930	Chamber of Commerce Pocatello.....	-	1,549	-	1,549	(1,549)	
71	930	Chamber of Commerce Salmon River Valley.....	120	33	-	153	(153)	
72	930	Chamber of Commerce Payette.....	-	83	-	83	(83)	
73	930	Chamber of Commerce Donations/Contributions/Sponsorship.....	12,403	-	-	12,403	(12,403)	
74	930	City Club of Boise.....	-	200	-	200	(200)	
75	930	Economic Development Chamber of Commerce.....	-	100	-	100	(100)	
76	930	Economic Development Contribution Star.....	500	-	-	500	(500)	
77	930	Economic Development Contribution Caldwell.....	2,500	-	-	2,500	(2,500)	
78	930	Edison Electric Institute.....	-	122,243	-	122,243	(122,243)	
79	930	Lions Club Nampa.....	-	167	-	167	(167)	
80	930	Great River Business Development.....	1,000	-	-	1,000	(1,000)	
81	930	Salmon River Chamber Steelhead.....	200	-	-	200	(200)	
82	930	Idaho City Managers Association.....	500	-	-	500	(500)	
83	930	Rotary Club Gooding.....	-	447	-	447	(447)	
84	930	Rotary Club Blue Lakes.....	-	279	-	279	(279)	
85	930	Rotary Club Buhl.....	-	103	-	103	(103)	
86	930	Rotary Club Hailey.....	-	157	-	157	(157)	
87	930	Rotary Club Jerome.....	-	221	-	221	(221)	
88	930	Rotary Club Nampa.....	-	96	-	96	(96)	
89	930	Rotary Club Ketchum/Sun Valley.....	-	86	-	86	(86)	
90	930	Rotary Club Twin Falls.....	-	208	-	208	(208)	
91		Total.....	\$ 30,803	\$ 149,822	\$ 21,272	\$ 201,897	\$ (201,897)	

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
	<b>Darrel Anderson</b>		
1	Total Expenses.....	\$ 13,733	
2	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
3	Arid Club.....	-	
4	EEI.....	(6,438)	
5	Total.....	7,295	
6	Payroll Percentage Allocated to IDACORP.....	3.20%	
7	Net IDACORP Exclusions.....	233	
8	Other Exclusions:		
9	Arid Club (100% Per IPUC Order 29505).....	-	
10	EEI (1/3 Per IPUC Order 29505).....	2,146	
11	Total Exclusions.....	2,379	
12		\$	\$ (2,379)
	<b>Rex Blackburn</b>		
13	Total Expenses.....	\$ 1,162	
14	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
15	Arid Club.....	-	
16	EEI.....	-	
17	Total.....	1,162	
18	Payroll Percentage Allocated to IDACORP.....	2.10%	
19	Net IDACORP Exclusions.....	24	
20	Other Exclusions:		
21	Arid Club (100% Per IPUC Order 29505).....	-	
22	EEI (1/3 Per IPUC Order 29505).....	-	
23	Total Exclusions.....	24	
24		\$	\$ (24)
	<b>Naomi Crafton-Shankel</b>		
25	Total Expenses.....	\$ 3,453	
26	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
27	Arid Club.....	-	
28	EEI.....	-	
29	Total.....	3,453	
30	Payroll Percentage Allocated to IDACORP.....	1.40%	
31	Net IDACORP Exclusions.....	48	
32	Other Exclusions:		
33	Arid Club (100% Per IPUC Order 29505).....	-	
34	EEI (1/3 Per IPUC Order 29505).....	-	
35	Total Exclusions.....	48	
36		\$	\$ (48)

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
	<b>John Gale</b>		
39	Total Expenses.....	\$ 15,453	
40	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
41	Arid Club.....	-	
42	EEI.....	(4,738)	
43	Total.....	10,715	
44	Payroll Percentage Allocated to IDACORP.....	0.00%	
45	Net IDACORP Exclusions.....	-	
46	Other Exclusions:		
47	Arid Club (100% Per IPUC Order 29505).....	-	
48	EEI (1/3 Per IPUC Order 29505).....	1,579	
49	Total Exclusions.....	1,579	\$ (1,579)
50	Total Expenses.....	\$ 15,453	
	<b>Dennis Gribble</b>		
51	Total Expenses.....	\$ -	
52	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
53	Arid Club.....	-	
54	EEI.....	-	
55	Total.....	-	
56	Payroll Percentage Allocated to IDACORP.....	0.00%	
57	Net IDACORP Exclusions.....	-	
58	Other Exclusions:		
59	Arid Club (100% Per IPUC Order 29505).....	-	
60	EEI (1/3 Per IPUC Order 29505).....	-	
61	Total Exclusions.....	-	\$ -
62	Total Expenses.....	\$ -	
	<b>Lisa Grow</b>		
63	Total Expenses.....	\$ 3,097	
64	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
65	Arid Club.....	-	
66	EEI.....	-	
67	Total.....	3,097	
68	Payroll Percentage Allocated to IDACORP.....	0.00%	
69	Net IDACORP Exclusions.....	-	
70	Other Exclusions:		
71	Arid Club (100% Per IPUC Order 29505).....	-	
72	EEI (1/3 Per IPUC Order 29505).....	-	
73	Total Exclusions.....	-	\$ -
74	Total Expenses.....	\$ 3,097	



IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
75	<b>Patrick Harrington</b>		
76	Total Expenses.....	\$ 1,403	
77	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
78	Arid Club.....	-	
79	EEI.....	-	
80	Total.....	1,403	
81	Payroll Percentage Allocated to IDACORP.....	1,40%	
82	Net IDACORP Exclusions.....	20	
83	Other Exclusions:		
84	Arid Club (100% Per IPUC Order 29505).....	-	
85	EEI (1/3 Per IPUC Order 29505).....	-	
86	Total Exclusions.....	\$ 20	\$ (20)
87	<b>LaMont Keen</b>		
88	Total Expenses.....	\$ 11,253	
89	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
90	Arid Club.....	-	
91	EEI.....	(8,179)	
92	Total.....	3,074	
93	Payroll Percentage Allocated to IDACORP.....	1,70%	
94	Net IDACORP Exclusions.....	52	
95	Other Exclusions:		
96	Arid Club (100% Per IPUC Order 29505).....	-	
97	EEI (1/3 Per IPUC Order 29505).....	2,726	
98	Total Exclusions.....	\$ 2,778	\$ (2,778)
99	<b>Steve Keen</b>		
100	Total Expenses.....	\$ 3,206	
101	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
102	Arid Club.....	-	
103	EEI.....	(941)	
104	Total.....	2,265	
105	Payroll Percentage Allocated to IDACORP.....	0.60%	
106	Net IDACORP Exclusions.....	14	
107	Other Exclusions:		
108	Arid Club (100% Per IPUC Order 29505).....	-	
109	EEI (1/3 Per IPUC Order 29505).....	314	
110	Total Exclusions.....	\$ 328	\$ (328)

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
111	<b>Warren Kline</b>		
112	Total Expenses.....	\$ -	
113	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
114	Arid Club.....	-	
115	EEI.....	-	
116	Total.....	-	
117	Payroll Percentage Allocated to IDACORP.....	0.00%	
118	Net IDACORP Exclusions.....	-	
119	Other Exclusions:		
120	Arid Club (100% Per IPUC Order 29505).....	-	
121	EEI (1/3 Per IPUC Order 29505).....	-	
122	Total Exclusions.....	-	\$ -
123	<b>Luci McDonald</b>		
124	Total Expenses.....	\$ 1,899	
125	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
126	Arid Club.....	-	
127	EEI.....	(779)	
128	Total.....	1,120	
129	Payroll Percentage Allocated to IDACORP.....	2.80%	
130	Net IDACORP Exclusions.....	31	
131	Other Exclusions:		
132	Arid Club (100% Per IPUC Order 29505).....	-	
133	EEI (1/3 Per IPUC Order 29505).....	260	
134	Total Exclusions.....	291	\$ (291)
135	<b>Jeffrey Maimen</b>		
136	Total Expenses.....	\$ -	
137	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
138	Arid Club.....	-	
139	EEI.....	-	
140	Total.....	-	
141	Payroll Percentage Allocated to IDACORP.....	87.10%	
142	Net IDACORP Exclusions.....	-	
143	Other Exclusions:		
144	Arid Club (100% Per IPUC Order 29505).....	-	
145	EEI (1/3 Per IPUC Order 29505).....	-	
146	Total Exclusions.....	-	\$ -

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
147	<b>Dan Minor</b>		
148	Total Expenses.....	\$ 3,678	
149	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
150	Arid Club.....	-	
151	EEI.....	-	
152	Total.....	<u>3,678</u>	
153	Payroll Percentage Allocated to IDACORP.....	0.00%	
154	Net IDACORP Exclusions.....	-	
155	Other Exclusions:		
156	Arid Club (100% Per IPUC Order 29505).....	-	
157	EEI (1/3 Per IPUC Order 29505).....	-	
158	Total Exclusions.....	<u>-</u>	<u>-</u>
		<u>\$ -</u>	<u>\$ -</u>
159	<b>Ken Petersen</b>		
160	Total Expenses.....	\$ 1,946	
161	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
162	Arid Club.....	-	
163	EEI.....	-	
164	Total.....	<u>1,946</u>	
165	Payroll Percentage Allocated to IDACORP.....	0.30%	
166	Net IDACORP Exclusions.....	<u>6</u>	
167	Other Exclusions:		
168	Arid Club (100% Per IPUC Order 29505).....	-	
169	EEI (1/3 Per IPUC Order 29505).....	-	
170	Total Exclusions.....	<u>6</u>	<u>(6)</u>
		<u>\$ 6</u>	<u>\$ (6)</u>
171	<b>Newell V Porter</b>		
172	Total Expenses.....	\$ 3,822	
173	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
174	Arid Club.....	-	
175	EEI.....	(1,140)	
176	Total.....	<u>2,682</u>	
177	Payroll Percentage Allocated to IDACORP.....	0.00%	
178	Net IDACORP Exclusions.....	-	
179	Other Exclusions:		
180	Arid Club (100% Per IPUC Order 29505).....	-	
181	EEI (1/3 Per IPUC Order 29505).....	380	
182	Total Exclusions.....	<u>380</u>	<u>(360)</u>
		<u>\$ 380</u>	<u>\$ (360)</u>

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
ADJUSTMENT TO MANAGEMENT EXPENSES  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)
No	Name	2010 Actuals	2010 Adjustments
183	<b>Gregory Said</b>		
184	Total Expenses.....	\$ 5,739	
185	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
186	Arid Club.....	-	
187	EEI.....	(3,690)	
188	Total.....	2,049	
189	Payroll Percentage Allocated to IDACORP.....	0.00%	
190	Net IDACORP Exclusions.....	-	
191	Other Exclusions:		
192	Arid Club (100% Per IPUC Order 29505).....	-	
193	EEI (1/3 Per IPUC Order 29505).....	1,230	
194	Total Exclusions.....	<u>1,230</u>	\$ (1,230)
195	<b>Lori Smith</b>		
196	Total Expenses.....	\$ 2,213	
197	IDACORP Exclusions Requiring Special Treatment (Listed Below):		
198	Arid Club.....	-	
199	EEI.....	-	
200	Total.....	2,213	
201	Payroll Percentage Allocated to IDACORP.....	4.30%	
202	Net IDACORP Exclusions.....	95	
203	Other Exclusions:		
204	Arid Club (100% Per IPUC Order 29505).....	-	
205	EEI (1/3 Per IPUC Order 29505).....	-	
206	Total Exclusions.....	<u>95</u>	\$ (95)
207	Total Reduction to Officer's Expenses.....	<u>\$ 9,158</u>	<u>\$ (9,158)</u>

IDAHO POWER COMPANY  
DEDUCTIONS FROM OPERATION AND MAINTENANCE EXPENSES  
OTHER EXCLUSIONS  
For Twelve Months Ended December 31, 2011

(1)	(2)	(3)	(4)	(5)	(6)		(7)		(8)	(9)	(10)	(11)
					2010	2010	Forecast Methodology	Forecast Ref				
Account	Actuals	2010	2010	2010	Base	Other	Adjustmen	No	Unadjusted	Annualizing	2011	Test Year
			Adjustments	Base	Base		Adjustmen	No	Test Year			Test Year
1	535	\$ 66	\$ (66)	\$ -	YES	\$ -	\$ -	-	\$ -	\$ -	\$ -	\$ -
2	536	22	(22)	-	YES	-	-	-	-	-	-	-
3	537	367	(367)	-	YES	-	-	-	-	-	-	-
4	539	39	(39)	-	YES	-	-	-	-	-	-	-
5	560	119	(119)	-	YES	-	-	-	-	-	-	-
6	561	76	(76)	-	YES	-	-	-	-	-	-	-
7	570	9	(9)	-	YES	-	-	-	-	-	-	-
8	571	11	(11)	-	YES	-	-	-	-	-	-	-
9	580	525	(525)	-	YES	-	-	-	-	-	-	-
10	583	74	(74)	-	YES	-	-	-	-	-	-	-
11	584	71	(71)	-	YES	-	-	-	-	-	-	-
12	586	15	(15)	-	YES	-	-	-	-	-	-	-
13	587	55	(55)	-	YES	-	-	-	-	-	-	-
14	588	245	(245)	-	YES	-	-	-	-	-	-	-
15	592	113	(113)	-	YES	-	-	-	-	-	-	-
16	593	124	(124)	-	YES	-	-	-	-	-	-	-
17	901	103	(103)	-	YES	-	-	-	-	-	-	-
18	903	69	(69)	-	YES	-	-	-	-	-	-	-
19	908	281	(281)	-	YES	-	-	-	-	-	-	-
20	910	47	(47)	-	YES	-	-	-	-	-	-	-
21	920	89	(89)	-	YES	-	-	-	-	-	-	-
22	921	1,467	(1,467)	-	YES	-	-	-	-	-	-	-
23	926	1,027	(1,027)	-	YES	-	-	-	-	-	-	-
24	928	17	(17)	-	YES	-	-	-	-	-	-	-
25	935	16	(16)	-	YES	-	-	-	-	-	-	-
26	Total	\$ 5,047	\$ (5,047)	\$ -			\$ -		\$ -	\$ -	\$ -	\$ -

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Douglas N. Jones  
Specific Rate Base, Revenue, and Expense Adjustments Not Provided Elsewhere

July 29, 2011

Idaho Power Company  
DETAIL OF ADDITIONAL RATE BASE, REVENUE AND EXPENSE ADJUSTMENTS  
FOR THE YEARS 2010 AND 2011

(1) Line No.	(2) Description	(3) Account No.	2010		2011			
			(4) Ratebase	(5) Revenue	(6) Expense	(7) Ratebase	(8) Revenue	(9) Expense
1	Prairie Power Acquisition Adjustment (IPUC Order No. 29505)	114	\$ (454,449)			\$ -		
2	Prairie Power Acquisition Adjustment Accumulated Amortization (IPUC Order No. 29505)	115	418,472			22,723		
3	Net Prairie Power Acquisition Adjustment		\$ (35,977)			\$ 22,723		
4	IERC Rate Base Adjustment (Bridge Used and Useful Adjustment - IPUC Order No. 29505)	123	\$ (85,531)					
5	FSAS 87 Pension Expense (OPUC Order No. 10-064)	926						\$ 8,788
6	Pension Expense Amortization (IPUC Order No. 31091)	926						\$ 13,993,913
7	Pension Expense Amortization (FERC)	926						\$ 129,964
8	Energy Efficiency Rider (IPUC Order No. 30189)	456		\$ (42,479,689)	\$ (42,479,689)			
9	Energy Efficiency Rider (IPUC Order No. 30189)	908						
10	Energy Efficiency Rider (Oregon)	456		\$ (1,704,367)	\$ (1,704,367)			
11	Energy Efficiency Rider (Oregon)	908						
12	Preliminary Survey and Investigation Charge - Coal Plant (IPUC Order No. 29904)	506			\$ (64,325)			
13	2010 Incentive	920			\$ (16,398,839)			
14	Architectural Fees Deferral (IPUC Order No. 30722)	923			\$ (7,395)			\$ 4,379
15	Intervenor Funding Amortization - CAPAI (IPUC Order No. 30976)	928						\$ 32,350
16	Citizens Utility Board 2011 Funding Grant Amortization (OPUC Order No. 11-011)	928						\$ 32,772
17	Citizens Utility Board 2010 Funding Grant (OPUC Order No. 10-406)	928						\$ 11,464
18	Intervenor Funding - CAPAI (IPUC Order No. 30722)	928						\$ 38,472
19	Intervenor Funding - Irrigators (IPUC Order No. 30722)	928						\$ 10,510
20	Intervenor Funding - CAPAI (IPUC Order No. 30892)	928						\$ 9,854
21	Intervenor Funding - ICL (IPUC Order No. 30892)	928						\$ 20,677
22	Intervenor Funding - IIPA (IPUC Order No. 30892)	928						\$ (2,180)
23	Intervenor Funding - Renewable Northwest Project and NW Energy Coalition (IPUC Order No. 30488)	928						\$ (3,551)
24	Intervenor Funding - Irrigators (IPUC Order No. 30508)	928						

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**SCOTT WRIGHT**

**July 29, 2011**



1 **Q. Please state your name and business address.**

2 A. My name is Scott Wright. I am employed by Idaho Power Company (“Idaho Power”  
3 or “Company”) as a Regulatory Analyst II in the Regulatory Affairs Department. My  
4 business address is 1221 West Idaho Street, Boise, Idaho 83702.

5 **Q. Please describe your educational background.**

6 A. I received a Bachelor of Science degree in Business Economics from Eastern  
7 Oregon University. I have also attended the Center for Public Utilities “Practical  
8 Skills for a Changing Electric Industry” course at New Mexico State University in  
9 Albuquerque, New Mexico, as well as the Edison Electric Institute’s “Electric Rate  
10 Advanced Course” in Madison, Wisconsin.

11 **Q. Please describe your work experience.**

12 A. In May 1998, I accepted a position as Research Assistant with Idaho Power in the  
13 Regulatory Affairs Department. In March 2007, I was promoted to a Regulatory  
14 Analyst I. In March 2010, I was promoted to a Regulatory Analyst II. As a  
15 Regulatory Analyst II, I am responsible for running the AURORA model to calculate  
16 net power supply expenses (“NPSE”) for ratemaking purposes, as well as the  
17 marginal cost of energy used in the Company’s marginal cost analysis. My duties  
18 also include providing analytical support for other regulatory activities within the  
19 Regulatory Affairs Department. In my current role, I served as the Company’s power  
20 supply expense witness in the last three Annual Power Cost Update (“APCU”) filings  
21 before the Oregon Public Utilities Commission (“Commission”), UE-203, UE-214, and  
22 UE-222.

23 **Q. What is the purpose of your testimony?**

24 A. The purpose of my testimony is to describe the Company’s variable power supply  
25 expenses under the 2011 Test Year and to compare those results to variable power  
26 supply expenses currently reflected in rates as a result of the Company’s 2011

1 October Update, the first portion of the APCU. As described in Company witness Mr.  
2 Timothy E. Tatum's testimony, the Company is not proposing to update the variable  
3 power supply expenses that have been modeled for the 2011 Test Year; instead, the  
4 Company is proposing to continue using the variable power supply expenses that  
5 were approved in Order No. 11-178 from the Company's 2011 October Update. As a  
6 result, the purpose of my testimony is to provide updated power supply expenses for  
7 informational purposes only.

8 **Q. How are variable power supply expenses "normalized" for ratemaking**  
9 **purposes?**

10 A. Variable power supply expenses are determined for each water condition starting  
11 with 1928. In this case, 83 water conditions have been evaluated. The average of  
12 the 83 water conditions is considered a reasonable representation of power supply  
13 expenses the Company might encounter during the test year.

14 **Q. Please define the term "power supply expense" as the Company and the**  
15 **Commission have used the term historically.**

16 A. The Company and the Commission have used the term "power supply expense" to  
17 refer to the sum of the following Federal Energy Regulatory Commission ("FERC")  
18 accounts: (FERC Accounts 501 and 547) and purchased power expenses (FERC  
19 Account 555), excluding Public Utility Regulatory Policies Act of 1978 ("PURPA")  
20 expenses minus surplus sales revenues (FERC Account 447). For ratemaking  
21 purposes, PURPA expenses have been quantified separately from other power  
22 supply expenses and are treated as fixed inputs to power supply modeling rather  
23 than variable inputs.

24 **Q. How does the Company determine its normalized variable power supply**  
25 **expenses for ratemaking purposes?**

26

1 A. The Company uses the AURORA model, which is a comprehensive electric market  
2 resource dispatch model. As with the October Update, the Company updated  
3 streamflows, loads, fuel prices, transportation costs, plant capacities, maintenance  
4 rates, heat rates, and forced outage rates for thermal plants.

5 **Q. Please describe the changes in the Company's system loads since the 2011**  
6 **October Update.**

7 A. The Company's 2011 October Update annual normalized system load was 1,826  
8 average megawatts ("aMW"). The Company's 2011 annual normalized system load  
9 used in the 2011 Test Year is 1,819 aMW, a decrease of 7 aMW.

10 **Q. Why have loads decreased by 7 aMW from what was previously filed in the**  
11 **2011 October Update?**

12 A. The decrease in loads from the 2011 October Update to the 2011 Test Year can be  
13 attributed to two primary factors. First, a term sales contract with Raft River Rural  
14 Electric Cooperative ("Raft River") is scheduled to expire on September 30, 2011.  
15 The Raft River load was included in the 2011 October Update, but it was removed  
16 from the 2011 Test Year as an annualizing adjustment. Also, the 2011 October  
17 Update uses a test period of April 2011 through March 2012, whereas the 2011 Test  
18 Year is a 2011 calendar year.

19 **Q. Is the Hoku Materials, Inc. ("Hoku") special contract load reflected in this**  
20 **annual normalized system load?**

21 A. Yes. As per Mr. Tatum's instruction, the Hoku special contract load was included in  
22 the 2011 Test Year at annualized 2012 levels to reflect Hoku's anticipated loads  
23 during the time that new rates will be effective.

24 **Q. Please explain the Hoku contract.**

25 A. The Electric Service Agreement ("ESA") between the Company and Hoku is  
26 separated into two revenue blocks. The first block revenues of the contract are

1 primarily the result of market based rates, while the second block revenues result  
2 from embedded cost-based rates. The energy component of the first block revenues  
3 is treated in a manner similar to surplus sales revenue, which reduces the NPSE.  
4 The first block revenue reduction of NPSE, equates to a \$23.9 million benefit to  
5 customers.

6 **Q. Was Hoku included in the 2011 October Update?**

7 A. Yes. The Hoku load was included in the 2011 October Update for the April 2011  
8 through March 2012 time period.

9 **Q. How have the fuel costs of the Company's coal-fired resources changed since  
10 the 2011 October Update?**

11 A. The fuel cost for the Bridger plant has not materially changed (from \$22.33 per  
12 megawatt-hours ("MWh") to \$22.21 per MWh), coal costs for Boardman have also  
13 remained relatively stable (from \$18.25 per MWh to \$18.07 per MWh), while coal  
14 costs for Valmy have increased (from \$30.94 per MWh to \$33.89 per MWh).

15 **Q. Please explain why coal costs have increased since the 2011 October Update  
16 for the Valmy plant.**

17 A. Coal price increases are the result of a number of factors, principally changes in  
18 mining and transportation costs. These price changes are passed to the plant via  
19 contract clauses which are tied to price indexes.

20 It is also worth mentioning that the unit cost at the Valmy plant has increased  
21 due to the same fixed costs being spread over smaller units of production. In other  
22 words, the amount of coal delivered to the plant has remained relatively constant,  
23 while the amount of energy production has declined from previous years, due to the  
24 economic dispatch of the plant. As mentioned earlier, this has led to a higher unit  
25 cost in terms of \$/MWh than in previous years.

26 **Q. Have natural gas prices changed since the 2011 October Update?**

1 A. Yes. Natural gas prices have declined since the 2011 October Update. The average  
2 Henry Hub gas price for the 2011 October Update was \$4.98 per MMBtu, while the  
3 average Henry Hub gas price used for the 2011 Test Year is \$4.25 per MMBtu.

4 **Q. Please explain how an increase or decrease in natural gas prices affects NPSE.**

5 A. Natural gas prices influence electricity prices within the AURORA model. When  
6 natural gas prices are high, surplus sales revenues are greater due to higher market  
7 prices, whereas when natural gas prices are low, the inverse occurs. Because Idaho  
8 Power is a net seller of electricity under "normal" conditions, a decrease in electricity  
9 prices caused by lower gas prices results in an increase in NPSE.

10 **Q. Have you prepared an exhibit to demonstrate the normalization of variable**  
11 **power supply expenses describing the changes you have described in your**  
12 **testimony?**

13 A. Yes. Exhibit 701 shows the results of the variable power supply expense  
14 normalization modeling for the 2011 Test Year. Exhibit 701 also shows the summary  
15 results containing the 83-year average variable power supply generation sources  
16 and expenses.

17 **Q. Please summarize the sources and disposition of energy shown on Exhibit**  
18 **701.**

19 A. Hydro generation supplies 8.7 million MWh, approximately 51 percent (8.7 million  
20 MWh / 17.2 million MWh = 51 percent) of the generation mix. Thermal generation  
21 supplies 5.0 million MWh (Bridger 4.0, Boardman 0.3, Valmy 0.7), approximately 29  
22 percent (5.0 million MWh / 17.2 million MWh = 29 percent) of the generation mix.  
23 Danskin and Bennett Mountain are peaking units so they supply energy at times  
24 when resources and/or transmission lines are constrained. Purchases of power are  
25 made up of short-term and longer-term market purchases and PURPA. PURPA  
26 purchases are normalized and account for nearly 1.8 million MWh. PURPA

1 purchases are not included on Exhibit 701; however, when combined with market  
2 purchases of 1.7 million MWh, total purchases amount to 3.5 million MWh (1.8  
3 million MWh + 1.7 million MWh = 3.5 million MWh) approximately 20 percent (3.5  
4 million MWh / 17.2 million MWh = 20 percent) of the generation mix. Of the 17.2  
5 million MWh consumed, 15.9 million MWh are utilized for system loads while nearly  
6 1.3 million MWh are sold as surplus.

7 **Q. Please describe the expense and revenue information associated with the**  
8 **normalized operation you described in Exhibit 701.**

9 A. Exhibit 701 contains variable power supply expense and revenue information limited  
10 to FERC Accounts 501, Fuel (coal); 547, Fuel (gas); 555, Purchased Power; and  
11 447, Sales for Resale. Hydro generation has no assumed fuel expense. Coal  
12 expenses of \$119.2 million are comprised of Bridger at \$88.5 million, Valmy at \$24.6  
13 million, and Boardman at \$6.1 million. Gas expenses of \$5.3 million are comprised  
14 of Danskin and Bennett Mountain. Purchased power expenses, not including  
15 PURPA, amount to \$70.8 million, surplus sales expenses amount to \$36.8 million,  
16 and the Hoku first block surplus sales amount to \$23.9 million. The NPSE amount to  
17 \$134.6 million (119.2 + 5.3 + 70.8 – 36.8 – 23.9).

18 **Q. How do these NPSE compare to the 2011 October Update?**

19 A. The NPSE approved in the 2011 October Update was \$118.4 million shown on  
20 Exhibit 702. The NPSE presented for the 2011 Test Year of \$134.6 million  
21 represents a \$16.2 million increase before PURPA repricing.

22 **Q. Please explain why the NPSE in the 2011 Test Year is higher than the NPSE for**  
23 **the 2011 October Update.**

24 A. The methodology used in the 2011 October Update used an average of forward  
25 market prices to reprice purchased power and surplus sales, while the Test Year  
26 scenario relies on AURORA to price purchased power and surplus sales.

1 **Q. Please describe the change in PURPA generation and expenses since the 2011**  
2 **October Update.**

3 A. PURPA generation increased from 195 aMW to 207 aMW, an increase of 12 aMW.  
4 PURPA expenses also increased from \$129.1 million to \$132.9 million, an increase  
5 of \$3.8 million. This increase was caused by additional PURPA coming on-line.

6 **Q. Have PURPA contracts been repriced to reflect the unlevelized avoided costs?**

7 A. Yes. PURPA contracts were repriced in both the 2011 October Update, and in the  
8 2011 Test Year.

9 **Q. How does the 2011 October Update NPSE including PURPA compare to the**  
10 **2011 Test Year?**

11 A. The 2011 October Update NPSE including PURPA was \$247.5 million, while the  
12 2011 NPSE including PURPA for the 2011 Test Year is \$267.5 million, an increase  
13 of \$20.0 million.

14 **Q. Did you provide the results of your analysis to Mr. Tatum?**

15 A. Yes.

16 **Q. Is any portion of the Company's request for rate relief associated with your**  
17 **power supply expense analysis for the 2011 Test Year?**

18 A. No. As mentioned earlier in my testimony, Mr. Tatum instructed me to quantify the  
19 Company's variable power supply expenses for a 2011 Test Year for information  
20 purposes only. Although my power supply expense analysis would suggest the need  
21 to increase rates, the Company is not requesting an upward adjustment to rates for  
22 power supply expenses changes. As described in Mr. Tatum's testimony, the  
23 Company believes that this matter is appropriately addressed in the context of the  
24 annual October Update component of the APCU.

25 **Q. Does this conclude your testimony?**

26 A. Yes.

Idaho Power/701  
Witness: Scott Wright

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Scott Wright  
Power Supply Expense for 2011 Normalized Loads Over  
83 Water Year Conditions

July 29, 2011



IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

AVERAGE

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	781,641.4	834,551.9	865,477.9	865,560.6	931,957.3	928,812.8	676,249.1	550,556.2	552,398.5	526,166.2	456,577.2	677,070.2	8,647,019.4
Bridge Energy (MWh)	375,072.7	324,257.9	284,091.1	196,192.6	159,202.9	135,471.9	380,850.4	420,232.3	368,078.1	427,788.0	437,123.1	475,437.9	3,983,798.9
Cost (\$ x 1000)	\$ 8,395.2	\$ 7,200.3	\$ 6,338.1	\$ 4,394.6	\$ 3,574.4	\$ 3,054.5	\$ 8,485.5	\$ 9,323.0	\$ 8,187.9	\$ 9,482.3	\$ 9,651.2	\$ 10,457.0	\$ 88,484.1
Boardman Energy (MWh)	30,164.5	28,089.6	30,690.8	13,314.7	-	17,002.0	37,787.0	37,855.7	36,025.3	35,492.0	34,519.7	37,487.3	338,428.6
Cost (\$ x 1000)	\$ 555.1	\$ 514.4	\$ 561.7	\$ 247.9	\$ -	\$ 318.6	\$ 672.8	\$ 674.6	\$ 643.5	\$ 638.4	\$ 620.4	\$ 668.9	\$ 6,116.3
Vainoy Energy (MWh)	55,353.6	47,705.1	11,443.6	2,538.2	1,148.0	145.2	65,809.2	95,402.8	61,135.6	117,390.0	119,757.9	146,581.4	724,410.4
Cost (\$ x 1000)	\$ 1,881.4	\$ 1,619.6	\$ 394.5	\$ 87.9	\$ 39.9	\$ 5.1	\$ 2,247.1	\$ 3,236.1	\$ 2,080.1	\$ 3,974.4	\$ 4,047.8	\$ 4,939.2	\$ 24,553.1
Danskin Energy (MWh)	-	-	-	-	-	8.9	2,109.8	3,185.4	356.5	77.6	5.4	0.3	5,743.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.4	\$ 102.7	\$ 157.4	\$ 18.2	\$ 3.5	\$ 0.2	\$ 0.0	\$ 282.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 437.0	\$ 553.4	\$ 608.3	\$ 455.4	\$ 454.6	\$ 437.7	\$ 451.5	\$ 5,343.8
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	219.9	156.8	4.9	2.3	-	-	383.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10.9	\$ 8.2	\$ 0.3	\$ 0.1	\$ -	\$ -	\$ 19.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10.9	\$ 8.2	\$ 0.3	\$ 0.1	\$ -	\$ -	\$ 19.5
Purchased Power (Excluding CSPP)	64,812.3	9,448.3	20,608.0	17,067.2	84,608.2	154,907.4	367,840.8	280,924.8	154,202.8	10,907.2	23,764.0	29,485.4	1,218,576.4
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,908.7
Contract Energy (MWh)	98,554.0	39,007.5	48,982.5	47,246.7	113,900.3	217,196.7	430,273.6	343,130.7	179,536.3	41,377.4	57,709.5	68,570.8	1,685,486.1
Market Cost (\$ x 1000)	\$ 1,891.4	\$ 275.2	\$ 601.9	\$ 484.3	\$ 2,445.1	\$ 4,120.9	\$ 12,939.3	\$ 10,475.5	\$ 5,696.8	\$ 345.8	\$ 751.3	\$ 1,287.1	\$ 41,314.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,734.2	\$ 1,891.1	\$ 1,744.2	\$ 1,695.5	\$ 3,623.0	\$ 8,776.3	\$ 17,920.8	\$ 15,479.3	\$ 7,083.3	\$ 2,011.9	\$ 2,976.5	\$ 3,846.6	\$ 70,782.8
Surplus Sales	92,507.5	220,742.7	212,402.1	198,637.7	73,765.2	51,791.2	1,860.6	5,293.8	40,348.6	157,284.0	63,522.7	144,346.3	1,262,502.5
Revenue Including Transmission Costs (\$ x 1000)	\$ 2,897.8	\$ 6,703.7	\$ 5,728.6	\$ 4,934.8	\$ 1,648.2	\$ 781.2	\$ 45.0	\$ 152.6	\$ 1,158.5	\$ 5,699.0	\$ 2,448.4	\$ 5,821.7	\$ 38,013.5
Transmission Costs (\$ x 1000)	\$ 92.5	\$ 220.7	\$ 212.4	\$ 198.6	\$ 73.8	\$ 51.8	\$ 1.9	\$ 5.3	\$ 40.3	\$ 157.3	\$ 63.5	\$ 144.3	\$ 1,262.5
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 2,805.3	\$ 6,482.9	\$ 5,516.2	\$ 4,736.2	\$ 1,574.5	\$ 729.4	\$ 43.1	\$ 147.3	\$ 1,118.1	\$ 5,541.7	\$ 2,384.9	\$ 5,677.4	\$ 36,751.0
Hoku First Block Revenues (\$ x 1000)	\$ 2,353.4	\$ 2,125.6	\$ 2,350.2	\$ 2,277.5	\$ 2,353.4	\$ 1,498.3	\$ 743.2	\$ 1,254.6	\$ 1,977.8	\$ 2,353.4	\$ 2,280.6	\$ 2,353.4	\$ 23,921.5
Net Power Supply Expenses (\$ x 1000)	\$ 9,693.0	\$ 2,931.4	\$ 1,571.2	\$ (151.6)	\$ 3,759.8	\$ 10,363.9	\$ 29,104.1	\$ 27,927.5	\$ 15,354.6	\$ 8,666.6	\$ 13,068.1	\$ 12,332.5	\$ 134,621.1





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1930

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	563,426.1	726,948.5	664,073.1	516,206.0	700,680.1	644,111.9	557,281.7	469,240.3	437,395.3	411,832.8	404,157.4	474,856.1	6,570,209.3
Bridger Energy (MWh)	483,442.6	436,348.0	479,560.5	379,288.0	302,365.9	279,206.5	475,507.8	472,063.4	437,426.2	462,983.0	459,098.3	483,436.8	5,150,726.8
Cost (\$ x 1000)	\$ 10,617.7	\$ 9,584.0	\$ 10,539.8	\$ 8,409.2	\$ 6,754.7	\$ 6,256.7	\$ 10,458.4	\$ 10,389.3	\$ 9,664.6	\$ 10,207.1	\$ 10,099.6	\$ 10,617.6	\$ 113,598.7
Boardman Energy (MWh)	39,537.4	34,952.1	39,091.4	16,481.6	-	21,573.7	38,916.1	38,066.2	36,356.4	37,353.0	36,864.5	39,904.4	379,096.8
Cost (\$ x 1000)	\$ 700.3	\$ 620.9	\$ 693.5	\$ 298.3	\$ -	\$ 400.7	\$ 690.8	\$ 677.8	\$ 648.5	\$ 666.9	\$ 656.3	\$ 705.9	\$ 6,760.0
Valmy Energy (MWh)	160,061.6	135,175.7	87,311.8	23,140.2	14,300.8	970.0	135,435.5	150,686.3	141,834.8	152,869.2	152,611.1	169,245.7	1,323,642.7
Cost (\$ x 1000)	\$ 5,381.4	\$ 4,562.1	\$ 2,983.8	\$ 806.2	\$ 499.6	\$ 35.0	\$ 4,597.2	\$ 5,083.4	\$ 4,792.8	\$ 5,152.6	\$ 5,134.9	\$ 5,673.2	\$ 44,702.2
Danskin Energy (MWh)	-	-	-	-	-	-	4,197.7	4,597.6	859.4	268.7	-	-	9,923.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 222.7	\$ 250.3	\$ 46.3	\$ 14.8	\$ -	\$ -	\$ 534.0
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 673.3	\$ 701.1	\$ 483.4	\$ 466.0	\$ 437.5	\$ 451.5	\$ 5,595.4
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	168.9	296.4	-	-	-	-	465.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9.1	\$ 16.4	\$ -	\$ -	\$ -	\$ -	\$ 25.4
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9.1	\$ 16.4	\$ -	\$ -	\$ -	\$ -	\$ 25.4
Purchased Power (Excluding CSPP)	14,132.2	-	130.4	30,864.5	114,087.8	240,289.8	317,899.8	256,743.0	136,086.7	6,603.4	7,090.2	66,196.8	1,190,124.6
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	47,874.0	29,559.2	28,504.9	61,044.1	143,379.9	302,579.1	380,332.6	318,948.9	161,420.2	37,073.6	41,035.7	105,282.1	1,657,034.3
Total Energy Excl. CSPP (MWh)	81,615.7	59,118.4	56,879.4	91,223.6	172,672.0	364,868.4	448,235.4	381,154.8	186,753.7	67,543.8	74,071.3	144,367.5	2,124,044.0
Market Cost (\$ x 1000)	\$ 584.8	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,366.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 49,265.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,145.9	\$ 2,152.7	\$ 5,010.7	\$ 11,951.8	\$ 19,222.5	\$ 16,928.6	\$ 7,632.9	\$ 1,983.2	\$ 2,533.6	\$ 6,128.4	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,427.6	\$ 3,231.8	\$ 2,288.3	\$ 3,363.8	\$ 6,186.7	\$ 16,607.3	\$ 24,084.0	\$ 21,932.3	\$ 9,000.4	\$ 3,649.3	\$ 4,785.8	\$ 8,686.9	\$ 78,733.8
Surplus Sales Energy (MWh)	46,084.9	310,128.8	270,268.4	69,958.4	28,293.2	1,616.3	405.0	8,668.5	58,100.1	111,369.7	51,594.8	11,931.2	968,419.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,904.9	\$ 12,276.4	\$ 9,334.0	\$ 2,318.4	\$ 679.9	\$ 46.9	\$ 11.4	\$ 258.8	\$ 1,863.1	\$ 4,447.1	\$ 2,281.5	\$ 563.8	\$ 36,006.0
Transmission Costs (\$ x 1000)	\$ 46.1	\$ 310.1	\$ 270.3	\$ 70.0	\$ 28.3	\$ 1.6	\$ 0.4	\$ 8.7	\$ 58.1	\$ 111.4	\$ 51.6	\$ 11.9	\$ 968.4
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,858.8	\$ 11,966.3	\$ 9,063.7	\$ 2,248.4	\$ 651.6	\$ 45.2	\$ 11.0	\$ 250.1	\$ 1,805.0	\$ 4,335.7	\$ 2,229.9	\$ 571.9	\$ 35,037.5
Net Power Supply Expenses (\$ x 1000)	\$ 17,614.1	\$ 4,731.0	\$ 6,698.3	\$ 9,854.2	\$ 12,063.8	\$ 19,035.5	\$ 35,640.4	\$ 33,546.5	\$ 21,417.3	\$ 14,140.0	\$ 16,631.9	\$ 23,004.8	\$ 214,377.9













IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1936

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,507.2	537,660.6	615,416.6	982,264.0	997,317.6	759,635.6	561,484.5	488,518.4	444,031.9	458,936.4	407,351.7	484,606.9	7,277,731.3
Bridger Energy (MWh)	481,436.6	436,093.9	437,104.5	290,050.1	232,423.1	221,740.9	450,182.3	464,316.2	423,520.2	450,669.5	457,996.4	483,265.2	4,828,798.9
Cost (\$ x 1000)	\$ 10,577.4	\$ 9,578.9	\$ 9,658.2	\$ 6,493.1	\$ 5,218.7	\$ 4,981.6	\$ 9,947.4	\$ 10,233.8	\$ 9,370.8	\$ 9,959.9	\$ 10,077.5	\$ 10,614.1	\$ 106,711.3
Boardman Energy (MWh)	36,585.0	34,828.6	34,824.0	14,201.5	-	22,589.5	39,511.3	38,519.3	36,726.7	36,848.3	36,923.3	39,697.1	371,254.7
Cost (\$ x 1000)	\$ 655.1	\$ 619.0	\$ 628.1	\$ 263.4	\$ -	\$ 422.4	\$ 699.9	\$ 684.7	\$ 654.2	\$ 659.1	\$ 657.2	\$ 702.8	\$ 6,646.0
Valmy Energy (MWh)	119,625.9	119,891.6	811.7	-	-	-	114,804.1	142,620.7	115,100.1	147,213.9	151,349.5	168,662.9	1,080,080.3
Cost (\$ x 1000)	\$ 4,081.8	\$ 4,075.5	\$ 29.4	\$ -	\$ -	\$ -	\$ 3,912.8	\$ 4,817.8	\$ 3,918.8	\$ 4,973.1	\$ 5,094.9	\$ 5,654.7	\$ 36,558.8
Danskin Energy (MWh)	-	-	-	-	-	-	3,420.9	5,376.8	600.5	22.1	-	-	9,420.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 167.3	\$ 269.9	\$ 29.8	\$ 1.1	\$ -	\$ -	\$ 468.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 618.0	\$ 720.7	\$ 466.9	\$ 452.3	\$ 437.5	\$ 451.5	\$ 5,529.5
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	474.2	332.5	-	-	-	-	806.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 23.5	\$ 16.9	\$ -	\$ -	\$ -	\$ -	\$ 40.4
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 23.5	\$ 16.9	\$ -	\$ -	\$ -	\$ -	\$ 40.4
Purchased Power (Excluding CSPP) Market Energy (MWh)	68,082.7	285.1	17,693.9	197.7	15,746.7	186,393.0	339,182.9	250,105.1	149,941.6	3,472.9	8,806.0	59,329.2	1,099,216.8
Contract Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPP (MWh)	101,824.4	29,824.4	46,068.4	30,377.2	45,038.9	248,682.3	401,615.6	312,310.9	175,275.1	33,943.1	42,761.5	98,414.6	1,566,126.5
Market Cost (\$ x 1000)	\$ 2,408.6	\$ 7.5	\$ 549.7	\$ 7.0	\$ 381.8	\$ 5,075.4	\$ 13,572.4	\$ 10,636.5	\$ 6,237.7	\$ 126.7	\$ 365.1	\$ 2,957.1	\$ 42,325.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,251.5	\$ 1,623.4	\$ 1,692.0	\$ 1,218.1	\$ 1,569.8	\$ 9,730.9	\$ 18,553.9	\$ 15,640.2	\$ 7,624.2	\$ 1,792.8	\$ 2,590.4	\$ 5,516.6	\$ 71,793.7
Surplus Sales Energy (MWh)	11,716.9	105,449.9	105,946.0	390,669.4	142,312.5	5,817.6	59.8	6,767.1	38,066.9	136,622.9	54,204.8	13,855.9	1,011,489.6
Revenue Including Transmission Costs (\$ x 1000)	\$ 475.4	\$ 4,012.2	\$ 3,240.4	\$ 10,571.6	\$ 3,572.6	\$ 144.7	\$ 1.8	\$ 199.4	\$ 1,153.7	\$ 5,342.9	\$ 2,287.9	\$ 643.2	\$ 31,645.9
Transmission Costs (\$ x 1000)	\$ 11.7	\$ 105.4	\$ 105.9	\$ 390.7	\$ 142.3	\$ 5.8	\$ 0.1	\$ 6.8	\$ 38.1	\$ 136.6	\$ 54.2	\$ 13.9	\$ 1,011.5
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 463.6	\$ 3,906.8	\$ 3,134.5	\$ 10,181.0	\$ 3,430.3	\$ 138.9	\$ 1.8	\$ 192.7	\$ 1,115.6	\$ 5,206.3	\$ 2,233.6	\$ 629.4	\$ 30,634.4
Net Power Supply Expenses (\$ x 1000)	\$ 19,448.0	\$ 12,304.4	\$ 9,272.3	\$ (1,770.2)	\$ 3,798.5	\$ 15,432.6	\$ 33,753.8	\$ 31,921.6	\$ 20,919.3	\$ 12,630.9	\$ 16,623.8	\$ 22,310.3	\$ 196,645.3



IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1938

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	550,966.8	770,204.1	870,727.0	938,908.1	1,138,307.2	1,160,857.0	738,184.1	521,476.5	510,938.1	508,794.6	407,436.8	764,612.8	8,881,413.1
Bridger Energy (MWh)	418,142.8	382,088.1	283,850.3	121,091.7	103,035.9	117,538.8	391,650.8	443,537.0	394,427.7	440,850.5	453,854.6	482,863.3	4,032,931.6
Cost (\$ x 1000)	\$ 9,283.7	\$ 8,494.9	\$ 6,386.7	\$ 2,747.0	\$ 2,338.8	\$ 2,684.9	\$ 8,757.8	\$ 9,816.8	\$ 8,772.1	\$ 9,762.8	\$ 9,994.3	\$ 10,606.1	\$ 89,646.0
Boardman Energy (MWh)	29,397.3	28,281.0	29,444.6	13,799.2	-	21,664.5	37,869.2	38,631.3	36,345.4	35,814.8	36,116.1	39,370.5	346,733.8
Cost (\$ x 1000)	\$ 545.0	\$ 518.7	\$ 545.7	\$ 257.2	\$ -	\$ 405.2	\$ 674.8	\$ 686.4	\$ 648.4	\$ 643.3	\$ 644.9	\$ 697.8	\$ 6,267.4
Valmy Energy (MWh)	15,331.1	5,177.1	-	-	-	-	54,438.5	113,835.6	50,559.4	139,175.1	144,031.1	160,818.8	663,366.6
Cost (\$ x 1000)	\$ 527.7	\$ 178.4	\$ -	\$ -	\$ -	\$ -	\$ 1,864.4	\$ 3,868.2	\$ 1,735.5	\$ 4,709.3	\$ 4,862.4	\$ 5,405.2	\$ 23,151.1
Danskin Energy (MWh)	-	-	-	-	-	-	127.6	4,334.7	126.3	9.9	-	-	4,598.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.7	\$ 198.8	\$ 5.7	\$ 0.5	\$ -	\$ -	\$ 210.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 456.4	\$ 649.6	\$ 442.8	\$ 451.6	\$ 437.5	\$ 451.5	\$ 5,272.0
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	112.5	-	-	-	-	112.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.2	\$ -	\$ -	\$ -	\$ -	\$ 5.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.2	\$ -	\$ -	\$ -	\$ -	\$ 5.2
Purchased Power (Excluding CSPP)	206,008.4	3,913.6	23,644.9	4,837.5	16,781.1	20,293.9	307,078.5	264,792.2	159,790.3	3,665.9	16,082.1	1,145.9	1,028,025.3
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	239,750.1	33,472.8	52,019.4	35,017.0	46,073.3	82,583.2	369,511.3	326,998.0	185,123.8	34,127.1	50,027.7	40,231.2	1,494,935.0
Market Cost (\$ x 1000)	\$ 6,248.4	\$ 99.2	\$ 707.5	\$ 146.0	\$ 464.6	\$ 537.4	\$ 10,489.4	\$ 10,111.4	\$ 5,877.0	\$ 100.8	\$ 584.6	\$ 36.5	\$ 35,402.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 8,091.2	\$ 1,715.0	\$ 1,849.9	\$ 1,357.1	\$ 1,642.6	\$ 5,192.8	\$ 15,470.9	\$ 15,115.1	\$ 7,263.5	\$ 1,766.9	\$ 2,809.8	\$ 2,595.9	\$ 64,870.8
Surplus Sales	5,309.9	166,356.5	207,760.0	182,601.0	154,960.0	135,793.4	336.9	3,703.9	20,330.8	167,762.5	49,300.4	227,099.8	1,321,315.0
Energy (MWh)	186.6	5,385.7	5,754.0	4,551.5	3,465.5	2,851.9	10.5	101.9	572.6	6,247.8	1,963.2	10,269.2	41,360.4
Revenue Including Transmission Costs (\$ x 1000)	\$ 5.3	\$ 166.4	\$ 207.8	\$ 162.6	\$ 155.0	\$ 135.8	\$ 0.3	\$ 3.7	\$ 20.3	\$ 167.8	\$ 49.3	\$ 227.1	\$ 1,321.3
Transmission Costs (\$ x 1000)	\$ 181.3	\$ 5,219.4	\$ 5,546.3	\$ 4,368.9	\$ 3,310.6	\$ 2,716.1	\$ 10.1	\$ 98.2	\$ 552.2	\$ 6,080.0	\$ 1,913.9	\$ 10,042.1	\$ 40,039.0
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 181.3	\$ 5,219.4	\$ 5,546.3	\$ 4,368.9	\$ 3,310.6	\$ 2,716.1	\$ 10.1	\$ 98.2	\$ 552.2	\$ 6,080.0	\$ 1,913.9	\$ 10,042.1	\$ 40,039.0
Net Power Supply Expenses (\$ x 1000)	\$ 18,612.2	\$ 6,002.2	\$ 3,635.2	\$ 428.6	\$ 1,121.1	\$ 6,003.4	\$ 27,214.1	\$ 30,043.1	\$ 18,310.1	\$ 11,254.0	\$ 16,835.0	\$ 9,714.4	\$ 149,173.4

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1939

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	661,997.8	755,940.7	928,490.4	954,831.4	942,172.5	703,223.6	564,207.2	477,788.7	443,994.4	480,422.8	405,247.3	494,440.0	7,812,756.7
Bridger Energy (MWh)	471,573.3	434,441.4	445,832.1	318,567.6	263,423.1	245,123.7	449,926.6	464,957.7	428,139.4	447,811.0	456,698.7	483,319.7	4,909,814.2
Cost (\$ x 1000)	\$ 10,379.5	\$ 9,545.7	\$ 9,848.1	\$ 7,118.9	\$ 5,903.9	\$ 5,509.3	\$ 9,941.9	\$ 10,246.7	\$ 9,478.2	\$ 9,902.5	\$ 10,051.4	\$ 10,615.2	\$ 108,541.4
Boardman Energy (MWh)	34,846.5	35,178.8	37,563.8	14,823.0	-	21,167.9	39,343.4	38,107.3	36,696.0	36,109.3	36,499.8	39,681.7	370,017.5
Cost (\$ x 1000)	\$ 628.5	\$ 624.4	\$ 670.1	\$ 272.9	\$ -	\$ 394.5	\$ 697.3	\$ 678.4	\$ 653.7	\$ 647.8	\$ 650.7	\$ 702.5	\$ 6,620.9
Valmy Energy (MWh)	116,430.1	128,226.2	5,684.3	-	-	-	113,248.7	141,039.7	114,245.8	146,260.9	150,266.7	167,133.0	1,082,535.4
Cost (\$ x 1000)	\$ 3,977.8	\$ 4,336.7	\$ 204.0	\$ -	\$ -	\$ -	\$ 3,857.8	\$ 4,764.0	\$ 3,891.1	\$ 4,942.8	\$ 5,060.5	\$ 5,606.0	\$ 36,640.8
Danskin Energy (MWh)	-	-	-	-	-	-	3,780.4	5,132.2	756.6	0.0	-	-	9,669.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 185.7	\$ 258.6	\$ 37.7	\$ 0.0	\$ -	\$ -	\$ 482.0
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 636.3	\$ 709.5	\$ 474.8	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,543.4
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	535.8	303.6	-	-	-	-	839.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 26.7	\$ 15.5	\$ -	\$ -	\$ -	\$ -	\$ 42.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 26.7	\$ 15.5	\$ -	\$ -	\$ -	\$ -	\$ 42.2
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 26.7	\$ 15.5	\$ -	\$ -	\$ -	\$ -	\$ 42.2
Purchased Power (Excluding CSPPP)	15,378.2	-	963.7	-	20,206.8	221,600.3	358,009.2	263,662.8	147,069.8	2,798.5	9,966.4	55,384.5	1,095,040.3
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	49,120.0	29,559.2	29,338.2	30,179.5	49,499.0	283,889.6	420,441.9	325,868.7	172,403.3	33,268.7	43,911.9	94,469.9	1,561,950.0
Total Energy Excl. CSPPP (MWh)	431.0	1,615.9	1,142.4	1,211.1	1,176.0	6,341.4	14,388.6	11,233.8	6,244.4	91.2	399.8	2,674.6	42,367.1
Market Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,366.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Contract Cost (\$ x 1000)	\$ 2,273.8	\$ 1,615.9	\$ 1,177.4	\$ 1,211.1	\$ 1,705.1	\$ 10,996.9	\$ 19,370.1	\$ 16,237.5	\$ 7,630.9	\$ 1,757.3	\$ 2,625.0	\$ 5,234.1	\$ 71,835.3
Total Cost Excl. CSPPP (\$ x 1000)	\$ 4,116.7	\$ 3,231.8	\$ 2,319.8	\$ 2,422.2	\$ 2,881.1	\$ 15,652.4	\$ 23,741.6	\$ 21,241.2	\$ 8,997.4	\$ 3,423.4	\$ 4,850.2	\$ 7,793.6	\$ 101,303.5
Surplus Sales Energy (MWh)	85,697.5	330,491.9	418,627.3	392,183.1	122,646.8	6,582.2	51.1	7,970.3	39,047.7	152,859.7	50,455.7	18,248.8	1,624,862.1
Revenue Including Transmission Costs (\$ x 1000)	\$ 3,320.5	\$ 12,207.3	\$ 12,753.3	\$ 11,009.9	\$ 3,418.1	\$ 169.5	\$ 1.4	\$ 234.0	\$ 1,194.8	\$ 6,028.0	\$ 2,124.5	\$ 872.8	\$ 53,334.0
Transmission Costs (\$ x 1000)	\$ 85.7	\$ 330.5	\$ 418.6	\$ 392.2	\$ 122.6	\$ 6.6	\$ 0.1	\$ 8.0	\$ 39.0	\$ 152.9	\$ 50.5	\$ 18.2	\$ 1,624.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 3,234.8	\$ 11,876.8	\$ 12,334.7	\$ 10,617.7	\$ 3,295.5	\$ 162.9	\$ 1.3	\$ 226.0	\$ 1,155.8	\$ 5,875.1	\$ 2,074.0	\$ 854.5	\$ 51,709.1
Net Power Supply Expenses (\$ x 1000)	\$ 14,370.7	\$ 4,560.3	\$ (36.0)	\$ (1,578.5)	\$ 4,763.9	\$ 17,174.4	\$ 34,528.9	\$ 32,425.6	\$ 20,973.1	\$ 11,826.5	\$ 16,751.1	\$ 21,754.9	\$ 177,514.9

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1940

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	523,550.7	747,383.7	945,137.2	853,081.2	994,582.5	676,610.1	565,527.9	467,175.1	480,842.8	506,612.5	404,675.2	525,584.0	7,690,742.9
Bridger Energy (MWh)	479,579.9	428,323.5	403,735.4	287,940.2	277,306.9	253,126.0	454,162.4	470,055.1	422,515.6	443,367.8	457,045.3	483,259.8	4,860,417.9
Cost (\$ x 1000)	\$ 10,540.2	\$ 9,422.9	\$ 8,973.7	\$ 6,447.9	\$ 6,207.5	\$ 5,687.1	\$ 10,030.0	\$ 10,349.0	\$ 9,365.3	\$ 9,813.4	\$ 10,058.4	\$ 10,614.0	\$ 107,509.4
Boardman Energy (MWh)	35,305.6	33,114.4	32,929.3	12,874.9	-	20,049.4	39,494.5	38,936.2	36,198.7	35,569.7	36,592.4	39,647.0	360,712.1
Cost (\$ x 1000)	\$ 635.5	\$ 592.8	\$ 599.1	\$ 243.0	\$ -	\$ 373.8	\$ 699.7	\$ 691.1	\$ 646.1	\$ 639.5	\$ 652.2	\$ 702.0	\$ 6,474.8
Valmy Energy (MWh)	116,043.5	101,700.2	811.7	-	-	-	116,581.5	145,121.4	102,019.2	143,208.4	149,991.0	167,297.3	1,042,774.2
Cost (\$ x 1000)	\$ 3,960.8	\$ 3,472.5	\$ 29.4	\$ -	\$ -	\$ -	\$ 3,974.0	\$ 4,902.0	\$ 3,478.3	\$ 4,841.8	\$ 5,051.7	\$ 5,611.2	\$ 35,321.8
Danskin Energy (MWh)	-	-	-	-	-	-	4,149.1	5,988.3	274.2	-	-	-	10,361.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 203.0	\$ 298.1	\$ 13.6	\$ -	\$ -	\$ -	\$ 514.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 653.6	\$ 748.9	\$ 450.7	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,576.0
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	303.8	541.6	-	-	-	-	845.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15.1	\$ 27.6	\$ -	\$ -	\$ -	\$ -	\$ 42.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15.1	\$ 27.6	\$ -	\$ -	\$ -	\$ -	\$ 42.6
Purchased Power (Excluding CSPPP)	70,919.0	-	518.5	2,890.6	6,471.3	242,272.6	348,827.5	263,261.7	131,816.7	3,245.4	9,770.6	35,638.4	1,115,632.3
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	104,660.7	29,559.2	28,893.0	33,070.1	35,763.4	304,581.9	411,260.3	325,467.5	157,150.3	33,715.6	43,716.2	74,723.8	1,582,542.0
Market Cost (\$ x 1000)	\$ 2,433.9	\$ -	\$ 16.0	\$ 86.4	\$ 174.3	\$ 6,778.1	\$ 14,103.4	\$ 11,386.1	\$ 5,346.1	\$ 90.2	\$ 391.6	\$ 1,595.3	\$ 42,401.4
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,881.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 4,276.7	\$ 1,615.9	\$ 1,158.4	\$ 1,287.5	\$ 1,352.2	\$ 11,433.5	\$ 19,084.9	\$ 16,389.8	\$ 6,732.6	\$ 1,756.3	\$ 2,616.9	\$ 4,154.8	\$ 71,869.6
Surplus Sales Energy (MWh)	10,873.7	287,221.3	383,215.0	260,727.9	175,214.9	7,523.4	48.4	8,011.9	41,805.7	171,458.4	49,852.4	29,716.8	1,425,669.7
Revenue Including Transmission Costs (\$ x 1000)	\$ 427.0	\$ 10,306.1	\$ 11,065.3	\$ 7,312.4	\$ 5,013.0	\$ 211.2	\$ 1.3	\$ 232.8	\$ 1,297.6	\$ 6,807.9	\$ 2,106.3	\$ 1,447.9	\$ 46,228.9
Transmission Costs (\$ x 1000)	\$ 10.9	\$ 287.2	\$ 383.2	\$ 280.7	\$ 175.2	\$ 7.5	\$ 0.0	\$ 8.0	\$ 41.8	\$ 171.5	\$ 49.9	\$ 29.7	\$ 1,425.7
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 416.1	\$ 10,018.8	\$ 10,682.1	\$ 7,051.7	\$ 4,837.7	\$ 203.7	\$ 1.3	\$ 224.8	\$ 1,255.8	\$ 6,636.4	\$ 2,056.5	\$ 1,418.2	\$ 44,803.2
Net Power Supply Expenses (\$ x 1000)	\$ 19,342.9	\$ 5,399.6	\$ 477.5	\$ 1,373.1	\$ 3,172.3	\$ 17,727.4	\$ 34,456.0	\$ 32,883.7	\$ 19,417.3	\$ 10,865.9	\$ 16,760.1	\$ 20,115.4	\$ 181,991.1

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1941

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	545,622.8	654,167.1	680,863.9	613,038.0	877,461.5	838,420.6	591,782.0	516,770.6	500,677.4	502,375.7	402,997.6	583,328.9	7,307,506.1
Bridger Energy (MWh)	477,678.8	434,762.1	453,609.8	335,092.4	283,072.7	236,721.7	450,096.8	466,081.4	399,904.6	432,785.6	448,713.8	478,966.3	4,897,486.1
Cost (\$ x 1000)	\$ 10,502.0	\$ 9,552.1	\$ 10,004.2	\$ 7,473.6	\$ 6,334.3	\$ 5,322.8	\$ 9,948.4	\$ 10,269.3	\$ 8,867.3	\$ 9,601.0	\$ 9,891.2	\$ 10,527.9	\$ 108,294.0
Boardman Energy (MWh)	34,308.2	34,581.1	38,714.5	14,625.6	-	21,001.0	39,542.2	38,709.7	35,418.9	34,427.7	33,202.9	33,470.9	358,002.7
Cost (\$ x 1000)	\$ 620.2	\$ 615.2	\$ 687.7	\$ 269.9	\$ -	\$ 391.2	\$ 700.4	\$ 687.6	\$ 634.2	\$ 622.1	\$ 600.2	\$ 607.4	\$ 6,436.2
Valmy Energy (MWh)	116,059.4	112,755.8	19,660.3	-	-	-	113,985.8	134,165.6	100,822.9	140,318.1	143,647.0	152,837.0	1,034,252.0
Cost (\$ x 1000)	\$ 3,965.3	\$ 3,844.5	\$ 698.3	\$ -	\$ -	\$ -	\$ 3,882.8	\$ 4,548.6	\$ 3,443.1	\$ 4,750.9	\$ 4,850.3	\$ 5,151.8	\$ 35,135.5
Danskin Energy (MWh)	-	-	-	-	-	-	2,730.1	4,577.8	71.5	8.6	-	-	7,388.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 133.5	\$ 228.9	\$ 3.5	\$ 0.4	\$ -	\$ -	\$ 366.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 584.2	\$ 679.7	\$ 440.7	\$ 451.6	\$ 437.5	\$ 451.5	\$ 5,427.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	306.1	154.1	-	-	-	-	460.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15.1	\$ 7.8	\$ -	\$ -	\$ -	\$ -	\$ 22.9
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15.1	\$ 7.8	\$ -	\$ -	\$ -	\$ -	\$ 22.9
Purchased Power (Excluding CSPPP)	57,593.0	-	5,439.2	28,808.7	24,711.9	118,584.4	330,649.0	230,327.9	135,396.6	8,007.2	23,385.2	36,037.4	998,940.6
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	91,334.8	29,559.2	33,813.7	58,988.2	54,004.0	180,873.6	393,081.8	292,533.8	160,730.2	38,477.4	57,330.8	75,122.8	1,465,850.3
Market Cost (\$ x 1000)	\$ 1,924.2	\$ -	\$ 189.1	\$ 795.1	\$ 656.8	\$ 2,991.4	\$ 13,245.7	\$ 9,856.0	\$ 5,333.5	\$ 222.4	\$ 801.7	\$ 1,129.0	\$ 37,144.8
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 3,767.0	\$ 1,615.9	\$ 1,331.4	\$ 2,006.2	\$ 1,834.8	\$ 7,646.9	\$ 18,227.2	\$ 14,859.8	\$ 6,720.0	\$ 1,888.5	\$ 3,026.9	\$ 3,688.5	\$ 66,613.0
Surplus Sales Energy (MWh)	16,736.4	212,971.4	198,394.1	95,537.4	82,102.4	30,186.6	93.0	7,768.4	40,428.0	157,372.0	43,716.5	62,909.0	948,215.1
Revenue Including Transmission Costs (\$ x 1000)	\$ 661.7	\$ 7,880.9	\$ 6,419.2	\$ 2,841.4	\$ 2,394.7	\$ 840.2	\$ 2.6	\$ 226.3	\$ 1,254.5	\$ 6,173.4	\$ 1,830.0	\$ 3,008.2	\$ 33,533.1
Transmission Costs (\$ x 1000)	\$ 16.7	\$ 213.0	\$ 198.4	\$ 95.5	\$ 82.1	\$ 30.2	\$ 0.1	\$ 7.8	\$ 40.4	\$ 157.4	\$ 43.7	\$ 62.9	\$ 948.2
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 644.9	\$ 7,667.9	\$ 6,220.8	\$ 2,745.9	\$ 2,312.6	\$ 810.0	\$ 2.5	\$ 218.6	\$ 1,214.0	\$ 6,016.0	\$ 1,786.3	\$ 2,945.3	\$ 32,584.9
Net Power Supply Expenses (\$ x 1000)	\$ 18,555.5	\$ 8,274.2	\$ 6,899.9	\$ 7,440.1	\$ 6,306.7	\$ 12,987.5	\$ 33,355.6	\$ 30,834.2	\$ 18,891.1	\$ 11,298.0	\$ 17,019.7	\$ 17,481.8	\$ 189,344.3

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1942

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	559,499.1	723,417.0	634,919.5	871,909.2	927,209.8	887,241.2	621,880.3	480,400.7	550,460.0	506,716.2	407,916.6	588,336.4	7,759,908.2
Bridger Energy (MWh)	443,280.6	389,346.3	445,257.3	306,004.8	289,351.2	240,962.7	432,331.3	454,871.4	429,329.6	451,753.9	457,228.5	483,102.3	4,822,819.8
Cost (\$ x 1000)	\$ 9,811.6	\$ 8,640.6	\$ 9,836.5	\$ 6,845.2	\$ 6,482.4	\$ 5,422.7	\$ 9,591.9	\$ 10,044.3	\$ 9,502.1	\$ 9,981.7	\$ 10,062.1	\$ 10,610.9	\$ 106,832.0
Boardman Energy (MWh)	30,233.0	28,322.1	36,990.9	14,102.6	-	21,265.5	38,156.3	37,510.2	36,697.9	36,798.7	36,118.6	38,450.1	354,646.0
Cost (\$ x 1000)	\$ 557.8	\$ 519.4	\$ 661.3	\$ 261.9	\$ -	\$ 396.0	\$ 679.2	\$ 669.3	\$ 653.8	\$ 658.4	\$ 644.9	\$ 683.7	\$ 6,385.5
Valmy Energy (MWh)	92,771.4	81,414.5	17,002.3	-	-	-	110,324.6	126,731.9	106,041.6	146,278.1	148,014.4	164,320.7	992,899.5
Cost (\$ x 1000)	\$ 3,183.5	\$ 2,801.2	\$ 603.7	\$ -	\$ -	\$ -	\$ 3,764.5	\$ 4,302.0	\$ 3,616.1	\$ 4,940.8	\$ 4,989.0	\$ 5,516.6	\$ 33,717.3
Danskin Energy (MWh)	-	-	-	-	-	-	697.9	4,085.2	2.7	52.3	-	-	4,838.1
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 33.9	\$ 203.8	\$ 0.1	\$ 2.6	\$ -	\$ -	\$ 240.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 484.6	\$ 654.7	\$ 437.3	\$ 453.8	\$ 437.5	\$ 451.5	\$ 5,301.9
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	50.5	-	-	-	-	50.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2.6	\$ -	\$ -	\$ -	\$ -	\$ 2.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2.6	\$ -	\$ -	\$ -	\$ -	\$ 2.6
Purchased Power (Excluding CSPP)	103,089.4	3,630.6	6,508.9	1,244.7	10,002.8	88,280.3	325,766.1	285,949.2	87,703.7	1,219.3	11,971.4	19,189.2	944,536.7
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	136,831.1	33,189.9	34,884.4	31,424.2	39,294.9	150,549.6	388,198.9	348,155.0	113,037.2	31,689.5	45,917.0	58,274.6	1,411,446.4
Market Cost (\$ x 1000)	\$ 3,006.3	\$ 89.5	\$ 197.8	\$ 35.6	\$ 285.3	\$ 2,246.5	\$ 12,447.0	\$ 11,716.4	\$ 3,597.4	\$ 39.4	\$ 476.7	\$ 710.7	\$ 34,848.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,849.2	\$ 1,705.4	\$ 1,340.1	\$ 1,246.7	\$ 1,463.3	\$ 6,902.0	\$ 17,428.5	\$ 16,720.2	\$ 4,983.9	\$ 1,705.4	\$ 2,701.9	\$ 3,270.2	\$ 64,316.7
Surplus Sales Energy (MWh)	14,333.9	202,823.8	140,780.5	297,222.8	123,418.4	53,193.6	148.0	6,576.0	78,376.1	182,279.3	53,027.3	71,682.9	1,223,862.5
Revenue Including Transmission Costs (\$ x 1000)	\$ 561.4	\$ 7,331.0	\$ 4,423.3	\$ 8,275.0	\$ 3,533.3	\$ 1,587.2	\$ 4.2	\$ 186.3	\$ 2,467.9	\$ 7,178.3	\$ 2,229.8	\$ 3,561.6	\$ 41,308.3
Transmission Costs (\$ x 1000)	\$ 14.3	\$ 202.8	\$ 140.8	\$ 297.2	\$ 123.4	\$ 53.2	\$ 0.1	\$ 6.6	\$ 78.4	\$ 182.3	\$ 53.0	\$ 71.7	\$ 1,223.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 547.0	\$ 7,128.1	\$ 4,281.6	\$ 7,977.8	\$ 3,409.9	\$ 1,504.0	\$ 4.0	\$ 179.7	\$ 2,389.5	\$ 6,996.0	\$ 2,176.8	\$ 3,489.9	\$ 40,084.4
Net Power Supply Expenses (\$ x 1000)	\$ 18,200.9	\$ 6,852.9	\$ 8,559.2	\$ 8,123.3	\$ 4,986.1	\$ 11,653.3	\$ 31,944.5	\$ 32,213.2	\$ 16,803.6	\$ 10,744.2	\$ 16,658.6	\$ 17,042.8	\$ 176,471.5







IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1945

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	543,439.1	931,897.8	609,492.4	653,829.0	1,052,955.4	1,123,321.6	646,442.1	527,661.1	622,981.3	498,681.4	522,187.0	838,776.0	8,571,644.2
Bridger Energy (MWh)	482,397.7	420,303.3	410,397.6	319,175.8	244,743.1	170,066.1	417,567.5	458,698.4	404,697.4	444,339.1	452,841.1	482,754.2	4,707,981.2
Cost (\$ x 1000)	\$ 10,596.7	\$ 9,261.9	\$ 9,092.6	\$ 7,102.2	\$ 5,495.8	\$ 3,853.8	\$ 9,295.5	\$ 10,121.1	\$ 8,978.2	\$ 9,832.9	\$ 9,974.0	\$ 10,603.9	\$ 104,208.7
Boardman Energy (MWh)	38,013.2	33,608.1	38,201.1	17,004.4	-	20,717.4	38,154.9	38,544.9	36,667.9	36,391.5	35,841.1	38,255.4	371,400.0
Cost (\$ x 1000)	\$ 677.0	\$ 600.3	\$ 679.9	\$ 306.3	\$ -	\$ 387.6	\$ 679.1	\$ 685.1	\$ 653.3	\$ 652.1	\$ 640.6	\$ 680.7	\$ 6,642.1
Valmy Energy (MWh)	110,519.6	50,558.1	6,486.9	-	-	-	84,648.0	122,172.7	85,695.5	141,759.8	144,252.8	159,529.9	905,623.2
Cost (\$ x 1000)	\$ 3,775.8	\$ 1,737.0	\$ 231.1	\$ -	\$ -	\$ -	\$ 2,889.1	\$ 4,151.2	\$ 2,927.7	\$ 4,792.2	\$ 4,869.5	\$ 5,364.3	\$ 30,737.9
Danskin Energy (MWh)	-	-	-	-	-	-	259.3	3,655.3	-	-	-	-	3,914.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12.1	\$ 174.6	\$ -	\$ -	\$ -	\$ -	\$ 186.7
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 462.7	\$ 625.5	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,248.0
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	73.7	-	-	-	-	73.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3.6	\$ -	\$ -	\$ -	\$ -	\$ 3.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3.6	\$ -	\$ -	\$ -	\$ -	\$ 3.6
Purchased Power (Excluding CSPPP)	77,447.7	-	31,857.3	30,284.3	8,394.9	17,699.6	342,005.8	240,075.6	72,257.7	2,233.7	639.9	340.2	823,216.9
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	111,189.5	29,559.2	60,231.8	60,443.8	37,687.0	79,988.9	404,438.6	302,281.4	97,591.2	32,703.9	34,585.5	39,425.6	1,290,126.6
Market Cost (\$ x 1000)	\$ 2,796.6	\$ -	\$ 1,010.9	\$ 929.9	\$ 253.4	\$ 432.8	\$ 12,465.3	\$ 9,652.6	\$ 2,812.9	\$ 73.4	\$ 17.6	\$ 10.8	\$ 30,456.2
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 4,639.5	\$ 1,615.9	\$ 2,153.3	\$ 2,141.0	\$ 1,431.3	\$ 5,088.3	\$ 17,446.9	\$ 14,656.3	\$ 4,199.4	\$ 1,739.5	\$ 2,242.8	\$ 2,570.2	\$ 59,924.4
Surplus Sales Energy (MWh)	37,299.1	413,065.3	96,547.4	124,259.0	202,939.1	147,251.5	71.8	7,863.5	90,421.1	162,865.7	147,536.5	297,936.6	1,728,056.5
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,364.8	\$ 13,821.1	\$ 3,073.1	\$ 3,640.2	\$ 5,234.2	\$ 3,482.0	\$ 2.3	\$ 224.6	\$ 2,822.9	\$ 6,230.4	\$ 5,971.1	\$ 13,550.0	\$ 59,416.9
Transmission Costs (\$ x 1000)	\$ -37.3	\$ 413.1	\$ 96.5	\$ 124.3	\$ 202.9	\$ 147.3	\$ 0.1	\$ 7.9	\$ 90.4	\$ 162.9	\$ 147.5	\$ 297.9	\$ 1,728.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,327.5	\$ 13,408.0	\$ 2,976.6	\$ 3,515.9	\$ 5,031.3	\$ 3,334.8	\$ 2.2	\$ 216.8	\$ 2,732.5	\$ 6,067.6	\$ 5,823.6	\$ 13,252.1	\$ 57,688.8
Net Power Supply Expenses (\$ x 1000)	\$ 18,707.3	\$ 121.6	\$ 9,579.4	\$ 6,469.9	\$ 2,346.2	\$ 6,431.5	\$ 30,771.2	\$ 30,026.0	\$ 14,463.2	\$ 11,400.3	\$ 12,340.8	\$ 6,418.5	\$ 149,075.8





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1948

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	888,864.3	940,615.6	747,225.4	948,817.6	898,697.8	1,239,790.9	656,199.1	528,135.7	530,053.6	516,132.6	411,569.3	663,898.8	8,989,800.6
Bridger Energy (MWh)	364,278.9	307,943.0	280,603.3	120,187.9	99,528.4	21,225.0	356,043.9	409,964.9	380,416.1	430,130.4	449,146.7	482,617.6	3,702,086.2
Cost (\$ x 1000)	\$ 8,155.0	\$ 6,901.0	\$ 6,352.3	\$ 2,725.1	\$ 2,269.6	\$ 487.5	\$ 7,977.1	\$ 9,142.9	\$ 8,476.1	\$ 9,532.9	\$ 9,899.9	\$ 10,601.1	\$ 82,520.6
Boardman Energy (MWh)	26,286.0	24,690.4	29,493.7	13,830.5	-	-	36,783.1	36,383.6	35,826.3	35,370.2	35,604.8	39,594.5	313,863.1
Cost (\$ x 1000)	\$ 494.3	\$ 463.8	\$ 546.5	\$ 257.7	\$ -	\$ -	\$ 656.3	\$ 652.0	\$ 640.4	\$ 636.5	\$ 637.0	\$ 701.2	\$ 5,685.7
Valmy Energy (MWh)	-	-	-	-	-	-	22,180.0	100,130.5	18,383.6	132,854.6	141,973.6	159,759.8	575,282.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 765.9	\$ 3,408.5	\$ 638.9	\$ 4,498.9	\$ 4,797.1	\$ 5,371.6	\$ 19,480.8
Danskin Energy (MWh)	-	-	-	-	-	-	612.3	2,258.9	10.9	-	0.0	-	2,882.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 26.4	\$ 99.9	\$ 0.5	\$ -	\$ 0.0	\$ -	\$ 126.8
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 477.1	\$ 550.8	\$ 437.6	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,188.1
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPPP)	54,882.9	4,472.4	52,235.3	6,345.9	139,333.1	40,629.9	457,196.3	307,173.1	180,097.0	9,407.7	18,150.8	3,837.8	1,273,762.0
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	88,624.6	34,031.6	80,609.8	36,525.4	168,625.2	102,919.2	519,629.0	369,378.9	205,430.5	39,877.9	52,096.4	42,923.2	1,740,671.7
Market Cost (\$ x 1000)	\$ 1,390.6	\$ 1,227.7	\$ 1,525.7	\$ 1,849.9	\$ 3,474.9	\$ 719.6	\$ 14,794.2	\$ 10,554.2	\$ 6,399.4	\$ 281.1	\$ 589.7	\$ 130.3	\$ 40,167.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 3,233.5	\$ 1,738.6	\$ 2,668.0	\$ 1,396.0	\$ 4,652.9	\$ 5,375.1	\$ 19,775.7	\$ 15,557.9	\$ 7,785.9	\$ 1,947.2	\$ 2,814.9	\$ 2,689.8	\$ 69,635.6
Surplus Sales Energy (MWh)	119,561.0	254,400.5	109,661.5	193,145.9	34,382.0	117,021.7	-	1,019.0	12,933.5	163,356.9	48,223.6	148,001.3	1,201,707.1
Revenue Including Transmission Costs (\$ x 1000)	\$ 3,680.5	\$ 7,306.6	\$ 3,155.4	\$ 4,683.3	\$ 547.5	\$ 1,259.8	\$ -	\$ 25.5	\$ 343.8	\$ 5,939.2	\$ 1,861.2	\$ 6,550.2	\$ 35,363.1
Transmission Costs (\$ x 1000)	\$ 119.6	\$ 254.4	\$ 109.7	\$ 193.1	\$ 34.4	\$ 117.0	\$ -	\$ 1.0	\$ 12.9	\$ 163.4	\$ 48.2	\$ 148.0	\$ 1,201.7
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 3,570.9	\$ 7,052.2	\$ 3,045.8	\$ 4,490.1	\$ 513.1	\$ 1,142.8	\$ -	\$ 24.5	\$ 330.9	\$ 5,775.9	\$ 1,813.0	\$ 6,402.2	\$ 34,161.4
Net Power Supply Expenses (\$ x 1000)	\$ 8,657.7	\$ 2,365.6	\$ 6,920.2	\$ 324.9	\$ 6,859.7	\$ 5,156.4	\$ 29,652.1	\$ 29,287.6	\$ 17,648.0	\$ 11,290.9	\$ 16,773.3	\$ 13,413.1	\$ 148,349.5











IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1953

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	921,662.2	1,055,971.3	1,014,350.7	1,010,740.0	886,256.2	1,181,472.7	766,563.5	548,171.8	569,603.3	515,261.9	407,698.2	650,283.6	9,530,035.7
Bridger Energy (MWh)	345,561.2	263,439.8	264,263.2	178,550.7	78,893.4	44,657.0	328,855.2	403,179.6	359,192.7	426,815.1	425,596.6	480,005.7	3,599,010.3
Cost (\$ x 1000)	\$ 7,735.4	\$ 5,908.3	\$ 6,002.2	\$ 4,064.0	\$ 1,813.9	\$ 1,030.9	\$ 7,384.7	\$ 9,006.8	\$ 8,005.9	\$ 9,466.4	\$ 9,397.7	\$ 10,548.7	\$ 80,364.8
Boardman Energy (MWh)	28,273.1	24,667.7	34,233.9	15,008.0	-	16,793.7	37,747.2	37,393.7	36,803.3	35,782.6	34,522.0	37,793.7	339,018.7
Cost (\$ x 1000)	\$ 527.8	\$ 463.4	\$ 619.1	\$ 275.7	\$ -	\$ 319.5	\$ 672.9	\$ 667.5	\$ 655.4	\$ 642.8	\$ 620.4	\$ 673.6	\$ 6,138.1
Valmy Energy (MWh)	-	-	-	-	-	-	17,063.2	65,743.6	3,392.7	122,269.0	133,257.1	149,557.9	491,283.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 604.5	\$ 2,256.7	\$ 118.1	\$ 4,145.6	\$ 4,510.7	\$ 5,047.6	\$ 16,683.3
Danskin Energy (MWh)	-	-	-	-	-	-	208.0	1,933.1	128.5	141.5	-	-	2,411.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8.5	\$ 81.4	\$ 5.4	\$ 6.0	\$ -	\$ -	\$ 401.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 459.2	\$ 532.3	\$ 442.5	\$ 457.2	\$ 437.5	\$ 451.5	\$ 5,162.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	56,602.6	471.2	702.4	1,170.3	161,402.7	58,623.8	378,661.9	327,385.2	175,956.3	11,842.5	44,478.0	15,547.1	1,232,844.0
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	90,344.4	30,030.4	29,076.9	31,349.9	190,694.8	120,913.1	441,094.7	389,591.0	201,289.8	42,312.7	78,423.6	54,632.5	1,699,753.7
Market Cost (\$ x 1000)	\$ 1,536.0	\$ 15.3	\$ 23.0	\$ 34.2	\$ 4,420.2	\$ 1,317.8	\$ 11,804.7	\$ 11,043.6	\$ 6,085.9	\$ 365.4	\$ 1,432.2	\$ 497.4	\$ 38,575.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,396.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,378.8	\$ 1,631.1	\$ 1,165.4	\$ 1,245.3	\$ 5,598.1	\$ 5,973.3	\$ 16,786.2	\$ 16,047.3	\$ 7,472.4	\$ 2,031.5	\$ 3,657.4	\$ 3,056.9	\$ 68,043.8
Surplus Sales	137,558.3	321,232.0	313,646.0	309,439.6	25,422.9	116,976.4	88.5	787.6	13,229.6	151,578.9	37,333.0	111,474.2	1,538,767.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 4,186.0	\$ 8,747.6	\$ 8,089.4	\$ 7,426.2	\$ 573.2	\$ 1,508.1	\$ 2.4	\$ 20.2	\$ 354.0	\$ 5,337.0	\$ 1,401.7	\$ 4,648.4	\$ 42,284.2
Transmission Costs (\$ x 1000)	\$ 137.6	\$ 321.2	\$ 313.6	\$ 309.4	\$ 25.4	\$ 117.0	\$ 0.1	\$ 0.8	\$ 13.2	\$ 151.6	\$ 37.3	\$ 111.5	\$ 1,538.8
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 4,048.4	\$ 8,426.4	\$ 7,775.8	\$ 7,116.7	\$ 547.8	\$ 1,391.1	\$ 2.3	\$ 19.4	\$ 340.8	\$ 5,185.4	\$ 1,364.4	\$ 4,536.9	\$ 40,755.4
Net Power Supply Expenses (\$ x 1000)	\$ 7,939.4	\$ (109.1)	\$ 410.0	\$ (1,095.4)	\$ 7,314.6	\$ 6,369.2	\$ 25,905.3	\$ 28,491.1	\$ 16,353.5	\$ 11,556.0	\$ 17,259.3	\$ 15,241.5	\$ 135,637.3

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1954

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	788,830.6	1,048,560.3	992,005.9	1,022,987.2	746,748.9	904,390.0	654,827.7	534,401.0	506,114.9	516,433.7	408,124.9	510,272.3	8,633,697.5
Bridger Energy (MWh)	371,785.7	314,540.3	202,045.4	95,312.7	79,959.8	43,179.5	355,110.9	401,932.8	369,721.0	429,420.9	434,364.1	482,927.1	3,580,300.2
Cost (\$ x 1000)	\$ 8,309.7	\$ 7,064.2	\$ 4,593.7	\$ 2,174.5	\$ 1,812.3	\$ 994.8	\$ 7,958.4	\$ 8,967.0	\$ 8,261.5	\$ 9,533.4	\$ 9,603.2	\$ 10,607.4	\$ 79,879.9
Boardman Energy (MWh)	27,659.7	24,677.1	28,504.6	13,796.5	-	16,050.6	35,170.2	34,976.0	32,769.2	34,555.4	32,287.9	38,357.9	318,805.3
Cost (\$ x 1000)	\$ 518.4	\$ 463.6	\$ 531.3	\$ 257.2	\$ -	\$ 308.8	\$ 633.4	\$ 630.5	\$ 593.6	\$ 624.0	\$ 586.2	\$ 682.3	\$ 5,829.2
Valmy Energy (MWh)	-	-	-	-	-	-	14,408.9	88,096.0	-	127,637.1	135,683.3	160,219.7	526,045.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 501.9	\$ 3,002.1	\$ -	\$ 4,326.8	\$ 4,592.5	\$ 5,386.3	\$ 17,809.6
Danskin Energy (MWh)	-	-	-	-	-	-	383.0	1,312.1	8.3	0.0	-	-	1,703.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 16.4	\$ 57.8	\$ 0.4	\$ 0.0	\$ -	\$ -	\$ 74.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 467.1	\$ 508.6	\$ 437.5	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,135.9
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	2.3	-	-	-	-	2.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.1
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.1
Purchased Power (Excluding CSPP)	82,445.5	458.4	2,729.6	3,345.1	289,996.8	223,488.5	469,122.2	322,652.6	228,907.2	9,275.9	34,519.0	53,566.3	1,719,487.1
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	116,187.2	30,017.6	31,104.1	33,524.6	318,288.9	285,757.8	531,554.9	384,858.5	254,240.8	39,746.1	68,464.6	92,651.7	2,186,396.8
Market Cost (\$ x 1000)	\$ 2,126.7	\$ 14.4	\$ 81.2	\$ 93.6	\$ 7,715.0	\$ 4,887.7	\$ 14,660.1	\$ 10,768.9	\$ 7,655.7	\$ 249.9	\$ 1,014.3	\$ 2,224.2	\$ 51,491.8
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,969.6	\$ 1,630.3	\$ 1,223.5	\$ 1,304.8	\$ 8,893.0	\$ 9,543.2	\$ 19,641.6	\$ 15,772.6	\$ 9,042.2	\$ 1,916.0	\$ 3,239.5	\$ 4,783.7	\$ 80,960.0
Surplus Sales	56,176.2	364,913.6	225,375.9	239,398.7	12,556.9	2,527.1	-	339.0	5,656.5	156,781.1	36,751.4	23,634.5	1,124,110.8
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,766.3	\$ 10,134.4	\$ 5,906.9	\$ 5,602.1	\$ 209.3	\$ 44.1	\$ -	\$ 8.4	\$ 142.8	\$ 5,643.6	\$ 1,384.1	\$ 1,008.4	\$ 31,650.5
Transmission Costs (\$ x 1000)	\$ -56.2	\$ 364.9	\$ 225.4	\$ 239.4	\$ 12.6	\$ 2.5	\$ -	\$ 0.3	\$ 5.7	\$ 156.8	\$ 36.8	\$ 23.6	\$ 1,124.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,710.1	\$ 9,769.5	\$ 5,681.5	\$ 5,362.7	\$ 196.8	\$ 41.6	\$ -	\$ 8.1	\$ 137.1	\$ 5,486.8	\$ 1,347.4	\$ 984.8	\$ 30,726.4
Net Power Supply Expenses (\$ x 1000)	\$ 11,433.3	\$ (297.0)	\$ 1,066.1	\$ (1,190.0)	\$ 10,958.8	\$ 11,241.8	\$ 29,202.4	\$ 28,872.9	\$ 18,197.6	\$ 11,364.6	\$ 17,111.4	\$ 20,926.3	\$ 158,888.3

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1955

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	601,540.0	749,639.5	635,071.2	542,422.1	800,409.0	764,675.3	612,362.5	487,849.6	528,300.5	506,622.3	406,413.8	736,700.6	7,372,006.5
Bridger Energy (MWh)	438,111.5	397,747.9	411,342.7	318,782.3	289,190.4	215,901.8	404,860.7	446,789.7	422,858.6	433,811.8	426,561.7	474,994.1	4,680,953.1
Cost (\$ x 1000)	\$ 9,684.5	\$ 8,809.2	\$ 9,111.6	\$ 7,104.8	\$ 6,468.1	\$ 4,872.1	\$ 9,023.3	\$ 9,882.0	\$ 9,372.2	\$ 9,621.6	\$ 9,446.6	\$ 10,448.1	\$ 103,844.1
Boardman Energy (MWh)	30,978.5	28,747.5	35,790.7	14,066.8	-	17,862.7	35,133.8	37,390.1	36,600.8	34,406.2	30,915.2	33,557.7	335,450.0
Cost (\$ x 1000)	\$ 569.2	\$ 525.9	\$ 642.9	\$ 261.3	\$ -	\$ 339.2	\$ 632.9	\$ 667.4	\$ 652.3	\$ 621.7	\$ 565.2	\$ 608.7	\$ 6,086.8
Valmy Energy (MWh)	98,061.5	58,397.2	6,569.0	-	-	-	89,078.7	125,395.5	104,035.3	136,269.0	136,586.9	151,078.8	909,471.7
Cost (\$ x 1000)	\$ 3,365.7	\$ 2,006.9	\$ 237.3	\$ -	\$ -	\$ -	\$ 3,046.1	\$ 4,260.7	\$ 3,546.5	\$ 4,680.5	\$ 4,689.5	\$ 5,096.0	\$ 30,929.2
Danskin Energy (MWh)	-	-	-	-	-	-	586.4	4,193.5	31.7	-	-	-	4,811.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 28.1	\$ 205.8	\$ 1.5	\$ -	\$ -	\$ -	\$ 235.4
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 478.7	\$ 656.7	\$ 438.7	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,296.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	32.5	-	-	-	-	32.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1.6	\$ -	\$ -	\$ -	\$ -	\$ 1.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1.6	\$ -	\$ -	\$ -	\$ -	\$ 1.6
Purchased Power (Excluding CSPP)	82,492.8	2,155.1	27,876.1	73,458.6	59,376.3	193,321.1	387,004.5	286,630.2	101,810.1	8,605.1	48,283.0	12,997.4	1,284,010.2
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	116,234.6	31,714.3	56,250.5	103,638.1	88,668.4	255,610.4	449,437.2	348,836.0	127,143.7	39,075.3	82,228.6	52,082.8	1,750,919.9
Market Cost (\$ x 1000)	\$ 2,512.3	\$ 55.6	\$ 897.4	\$ 2,139.3	\$ 1,767.1	\$ 4,851.1	\$ 13,376.2	\$ 11,449.8	\$ 4,121.1	\$ 234.8	\$ 1,500.5	\$ 352.3	\$ 43,257.4
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,366.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,355.1	\$ 1,671.5	\$ 2,039.8	\$ 3,350.4	\$ 2,945.0	\$ 9,506.5	\$ 18,357.7	\$ 16,453.5	\$ 5,507.6	\$ 1,900.9	\$ 3,725.7	\$ 2,911.8	\$ 72,725.6
Surplus Sales	36,648.5	213,379.7	116,750.1	52,710.4	45,841.8	7,204.4	-	5,258.0	61,779.2	161,166.0	42,523.4	187,595.0	930,856.5
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,374.8	\$ 7,458.0	\$ 3,600.6	\$ 1,580.3	\$ 1,222.7	\$ 185.6	\$ -	\$ 147.7	\$ 1,928.4	\$ 6,257.3	\$ 1,770.5	\$ 8,481.6	\$ 34,007.5
Transmission Costs (\$ x 1000)	\$ -36.6	\$ -213.4	\$ 116.8	\$ 52.7	\$ 45.8	\$ 7.2	\$ -	\$ 5.3	\$ 61.8	\$ 161.2	\$ 42.5	\$ 187.6	\$ 930.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,338.1	\$ 7,244.6	\$ 3,483.8	\$ 1,527.6	\$ 1,176.9	\$ 178.4	\$ -	\$ 142.5	\$ 1,866.6	\$ 6,096.1	\$ 1,728.0	\$ 8,294.0	\$ 33,076.6
Net Power Supply Expenses (\$ x 1000)	\$ 16,982.3	\$ 6,083.3	\$ 8,946.9	\$ 9,625.1	\$ 8,686.6	\$ 14,976.0	\$ 31,538.6	\$ 31,779.5	\$ 17,650.7	\$ 11,179.8	\$ 17,136.5	\$ 11,222.2	\$ 185,807.5













IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1961

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,384.5	641,850.0	587,016.5	483,106.9	738,823.8	740,486.2	543,536.2	462,408.7	444,082.5	495,264.1	406,780.3	506,945.9	6,570,685.6
Bridger Energy (MWh)	438,845.7	360,994.9	372,230.8	320,891.3	276,400.0	233,596.3	440,578.9	466,437.1	427,025.7	447,843.8	458,888.2	483,216.7	4,726,949.3
Cost (\$ x 1000)	\$ 9,722.6	\$ 8,056.8	\$ 8,311.8	\$ 7,169.5	\$ 6,197.6	\$ 5,263.5	\$ 9,757.4	\$ 10,276.4	\$ 9,441.1	\$ 9,903.2	\$ 10,095.4	\$ 10,613.2	\$ 104,808.5
Boardman Energy (MWh)	29,842.7	24,093.3	28,794.9	13,950.3	-	8,590.4	37,992.7	38,052.9	36,658.3	36,038.1	36,567.8	39,543.9	330,125.4
Cost (\$ x 1000)	\$ 551.8	\$ 454.6	\$ 535.8	\$ 259.5	\$ -	\$ 169.4	\$ 676.7	\$ 677.6	\$ 653.2	\$ 646.7	\$ 651.8	\$ 700.4	\$ 5,977.5
Valmy Energy (MWh)	119,564.2	64,693.5	6,113.0	-	-	-	111,611.3	146,464.4	123,590.2	146,413.8	151,676.4	166,796.4	1,036,923.2
Cost (\$ x 1000)	\$ 4,053.5	\$ 2,201.0	\$ 216.9	\$ -	\$ -	\$ -	\$ 3,790.0	\$ 4,949.5	\$ 4,207.8	\$ 4,947.6	\$ 5,105.2	\$ 5,695.3	\$ 35,066.8
Danskin Energy (MWh)	-	-	-	-	-	-	4,419.3	6,048.1	864.9	-	-	-	11,332.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 221.0	\$ 310.3	\$ 43.9	\$ -	\$ -	\$ -	\$ 575.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 671.6	\$ 761.1	\$ 481.0	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,636.5
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	150.3	290.3	-	-	-	-	440.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7.6	\$ 15.1	\$ -	\$ -	\$ -	\$ -	\$ 22.7
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7.6	\$ 15.1	\$ -	\$ -	\$ -	\$ -	\$ 22.7
Purchased Power (Excluding CSPP)	116,558.8	39,865.8	65,159.6	103,347.8	116,595.8	207,410.6	390,719.7	272,567.9	143,672.9	2,741.1	7,510.4	46,398.9	1,512,549.3
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	150,300.5	69,425.0	93,534.1	133,527.3	145,888.0	269,699.9	453,152.4	334,773.8	169,006.4	33,211.3	41,456.0	85,484.3	1,979,459.0
Market Cost (\$ x 1000)	\$ 3,439.8	\$ 922.2	\$ 1,796.1	\$ 2,908.7	\$ 3,468.2	\$ 4,908.8	\$ 15,474.4	\$ 11,811.9	\$ 6,260.9	\$ 81.7	\$ 326.0	\$ 2,213.2	\$ 53,612.0
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,366.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 5,282.7	\$ 2,538.1	\$ 2,938.5	\$ 4,119.8	\$ 4,646.2	\$ 9,564.3	\$ 20,456.0	\$ 16,815.7	\$ 7,647.4	\$ 1,747.8	\$ 2,551.2	\$ 4,772.7	\$ 83,080.2
Surplus Sales	10,651.0	108,172.3	59,397.2	25,262.9	28,666.6	5,511.3	-	9,248.0	44,041.2	167,754.0	53,200.3	21,190.2	533,094.9
Revenue Including Transmission Costs (\$ x 1000)	\$ 402.6	\$ 3,799.1	\$ 1,810.2	\$ 748.8	\$ 633.6	\$ 145.6	\$ -	\$ 269.7	\$ 1,372.3	\$ 6,709.3	\$ 2,276.8	\$ 1,025.5	\$ 19,192.5
Transmission Costs (\$ x 1000)	\$ 10.7	\$ 108.2	\$ 59.4	\$ 25.3	\$ 28.7	\$ 5.5	\$ -	\$ 9.2	\$ 44.0	\$ 167.8	\$ 53.2	\$ 21.2	\$ 533.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 391.9	\$ 3,691.0	\$ 1,750.8	\$ 723.5	\$ 605.0	\$ 140.1	\$ -	\$ 260.4	\$ 1,328.2	\$ 6,540.5	\$ 2,223.6	\$ 1,004.3	\$ 18,659.4
Net Power Supply Expenses (\$ x 1000)	\$ 19,564.4	\$ 9,874.0	\$ 10,651.2	\$ 11,261.6	\$ 10,689.1	\$ 15,293.7	\$ 35,359.3	\$ 33,234.9	\$ 21,102.3	\$ 11,156.0	\$ 16,617.4	\$ 21,128.8	\$ 215,932.8





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1964

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	781,761.4	868,936.2	672,681.2	1,209,024.2	835,188.6	1,214,904.3	657,399.1	621,056.8	618,281.6	496,195.6	502,950.7	1,068,768.0	9,547,149.6
Bridger Energy (MWh)	351,759.3	309,366.2	237,710.8	64,941.9	98,831.2	-	325,880.1	390,873.5	342,284.1	408,908.6	424,476.9	440,731.5	3,395,764.3
Cost (\$ x 1000)	\$ 7,874.5	\$ 6,917.3	\$ 5,406.6	\$ 1,510.0	\$ 2,267.6	-	\$ 7,320.1	\$ 8,735.2	\$ 7,643.2	\$ 9,107.0	\$ 9,390.0	\$ 9,760.5	\$ 75,931.8
Boardman Energy (MWh)	28,465.7	27,220.4	31,744.1	13,525.8	-	5,351.2	36,759.9	37,819.6	35,583.1	33,332.1	33,791.5	32,201.1	315,794.4
Cost (\$ x 1000)	\$ 530.7	\$ 502.5	\$ 581.0	\$ 253.0	-	\$ 106.4	\$ 655.4	\$ 674.0	\$ 636.7	\$ 605.3	\$ 609.3	\$ 588.0	\$ 5,742.2
Valmy Energy (MWh)	-	-	-	-	-	-	5,438.4	46,538.4	5,435.0	110,190.0	131,882.8	135,727.7	435,212.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 191.9	\$ 1,595.2	\$ 189.0	\$ 3,748.7	\$ 4,467.1	\$ 4,598.7	\$ 14,790.5
Danskin Energy (MWh)	-	-	-	-	-	-	258.8	136.8	-	-	-	-	395.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10.5	\$ 5.7	\$ -	\$ -	\$ -	\$ -	\$ 16.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 461.2	\$ 456.5	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 461.2	\$ 456.5	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,077.5
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPPP)	107,923.0	18,006.4	113,702.0	148.3	193,560.9	58,022.5	503,273.3	287,763.4	152,786.9	20,690.4	15,642.5	2,467.6	1,473,987.4
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	141,664.8	47,565.7	142,076.5	30,327.8	222,853.0	120,311.8	565,706.1	349,969.2	178,120.5	51,160.6	49,588.1	41,553.0	1,940,897.1
Market Cost (\$ x 1000)	\$ 2,955.8	\$ 537.6	\$ 3,324.0	\$ 4.5	\$ 5,372.1	\$ 1,103.2	\$ 15,425.7	\$ 9,473.2	\$ 5,089.9	\$ 596.4	\$ 445.7	\$ 65.0	\$ 44,393.2
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 4,798.6	\$ 2,153.5	\$ 4,466.4	\$ 1,215.6	\$ 6,550.1	\$ 5,758.7	\$ 20,407.2	\$ 14,476.9	\$ 6,476.4	\$ 2,262.5	\$ 2,670.9	\$ 2,624.5	\$ 73,861.4
Surplus Sales Energy (MWh)	55,376.9	200,222.2	55,956.7	391,596.4	24,462.5	93,675.2	-	1,168.3	22,520.5	108,776.7	100,521.6	458,158.0	1,512,435.1
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,702.3	\$ 5,773.8	\$ 1,573.6	\$ 8,686.8	\$ 574.7	\$ 924.1	\$ -	\$ 29.7	\$ 610.2	\$ 3,748.6	\$ 3,693.2	\$ 16,621.2	\$ 43,918.2
Transmission Costs (\$ x 1000)	\$ 55.4	\$ 200.2	\$ 56.0	\$ 391.6	\$ 24.5	\$ 93.7	\$ -	\$ 1.2	\$ 22.5	\$ 108.8	\$ 100.5	\$ 458.2	\$ 1,512.4
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,646.9	\$ 5,573.5	\$ 1,517.7	\$ 8,275.2	\$ 550.3	\$ 830.5	\$ -	\$ 28.5	\$ 587.7	\$ 3,639.8	\$ 3,592.6	\$ 16,163.0	\$ 42,405.7
Net Power Supply Expenses (\$ x 1000)	\$ 11,902.8	\$ 4,314.3	\$ 9,335.3	\$ (4,860.3)	\$ 8,717.7	\$ 5,471.3	\$ 29,035.7	\$ 25,909.3	\$ 14,794.7	\$ 12,534.8	\$ 13,982.0	\$ 1,860.1	\$ 132,997.6







IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1967

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	573,494.5	889,886.7	576,232.0	868,876.2	845,716.6	1,168,472.3	673,075.5	519,531.4	607,288.2	573,894.1	532,333.2	766,302.3	8,585,083.3
Bridger Energy (MWh)	397,226.5	326,288.5	291,701.4	238,814.2	182,949.0	71,595.5	370,748.5	423,120.6	383,619.8	433,122.1	443,789.3	482,679.9	4,045,655.2
Cost (\$ x 1000)	\$ 8,857.8	\$ 7,309.8	\$ 6,546.8	\$ 5,353.8	\$ 4,134.8	\$ 1,652.1	\$ 8,302.4	\$ 9,407.0	\$ 8,540.4	\$ 9,607.7	\$ 9,792.3	\$ 10,602.4	\$ 90,107.2
Boardman Energy (MWh)	26,925.9	24,817.4	29,878.6	14,429.9	-	4,580.2	35,611.4	37,416.8	36,249.2	35,263.0	34,513.7	38,515.2	318,201.3
Cost (\$ x 1000)	\$ 504.1	\$ 465.7	\$ 552.4	\$ 266.9	\$ -	\$ 92.2	\$ 640.2	\$ 667.8	\$ 646.9	\$ 634.9	\$ 620.3	\$ 684.7	\$ 5,776.0
Valmy Energy (MWh)	-	-	-	-	-	-	23,229.0	107,253.3	42,371.5	132,094.4	137,549.0	157,607.0	600,104.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 797.3	\$ 3,649.5	\$ 1,453.6	\$ 4,477.2	\$ 4,651.7	\$ 5,303.2	\$ 20,332.5
Danskin Energy (MWh)	-	-	-	-	-	-	112.0	2,555.7	-	1.5	-	-	2,669.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4.9	\$ 115.4	\$ -	\$ 0.1	\$ -	\$ -	\$ 120.4
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 455.6	\$ 566.2	\$ 437.1	\$ 451.3	\$ 437.5	\$ 451.5	\$ 5,181.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	220,901.6	8,372.2	134,670.2	7,905.0	123,759.0	44,190.4	426,248.0	296,446.8	109,620.5	2,921.8	2,858.1	1,178.0	1,379,071.6
Market Energy (MWh)	33,741.7	29,569.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	254,643.4	37,931.5	163,044.7	38,084.5	153,051.1	106,479.7	488,680.7	358,652.6	134,954.0	33,392.0	36,803.6	40,263.4	1,845,981.3
Market Cost (\$ x 1000)	\$ 6,282.6	\$ 2,156.6	\$ 3,925.9	\$ 235.2	\$ 3,529.9	\$ 812.9	\$ 13,630.5	\$ 10,634.5	\$ 3,961.0	\$ 79.0	\$ 77.5	\$ 34.1	\$ 43,418.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 8,125.5	\$ 1,831.4	\$ 5,068.2	\$ 1,446.3	\$ 4,707.8	\$ 5,488.4	\$ 18,612.1	\$ 15,638.2	\$ 5,347.5	\$ 1,745.1	\$ 2,302.7	\$ 2,593.6	\$ 72,886.8
Surplus Sales Energy (MWh)	4,004.8	226,044.1	32,590.7	224,008.2	49,288.1	104,231.9	-	3,300.9	47,270.2	216,754.6	142,816.1	224,567.6	1,274,877.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 126.6	\$ 6,610.9	\$ 975.6	\$ 6,183.2	\$ 1,154.0	\$ 1,553.1	\$ -	\$ 88.9	\$ 1,353.4	\$ 7,862.5	\$ 5,519.1	\$ 9,910.2	\$ 41,337.3
Transmission Costs (\$ x 1000)	\$ 4.0	\$ 226.0	\$ 32.6	\$ 224.0	\$ 49.3	\$ 104.2	\$ -	\$ 3.3	\$ 47.3	\$ 216.8	\$ 142.8	\$ 224.6	\$ 1,274.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 122.6	\$ 6,384.9	\$ 943.0	\$ 5,959.2	\$ 1,104.7	\$ 1,448.9	\$ -	\$ 85.6	\$ 1,306.1	\$ 7,645.7	\$ 5,376.3	\$ 9,685.6	\$ 40,062.5
Net Power Supply Expenses (\$ x 1000)	\$ 17,710.5	\$ 3,536.6	\$ 11,623.5	\$ 1,544.1	\$ 8,188.2	\$ 6,200.4	\$ 28,807.5	\$ 29,843.2	\$ 15,119.4	\$ 9,270.4	\$ 12,428.3	\$ 9,949.7	\$ 154,221.8

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1968

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	772,192.0	892,536.1	917,326.0	759,857.6	807,967.9	802,456.5	577,007.2	582,628.6	615,330.3	496,561.9	527,578.1	786,817.9	8,538,260.2
Bridger Energy (MWh)	403,181.4	357,045.2	227,986.3	240,691.0	204,918.2	139,324.6	390,389.0	424,008.7	373,197.8	421,037.3	417,373.0	478,243.1	4,077,395.4
Cost (\$ x 1000)	\$ 8,892.0	\$ 7,992.3	\$ 5,162.3	\$ 5,409.6	\$ 4,612.0	\$ 3,185.7	\$ 8,727.9	\$ 9,424.8	\$ 8,327.5	\$ 9,354.1	\$ 9,262.1	\$ 10,513.3	\$ 90,963.7
Boardman Energy (MWh)	29,064.8	26,341.2	28,113.5	14,498.3	-	19,396.3	38,061.6	37,246.1	33,775.4	33,272.8	30,561.7	36,211.3	326,543.1
Cost (\$ x 1000)	\$ 539.9	\$ 489.0	\$ 525.4	\$ 267.9	\$ -	\$ 362.9	\$ 677.7	\$ 665.2	\$ 609.0	\$ 604.4	\$ 559.8	\$ 649.4	\$ 5,950.6
Valmy Energy (MWh)	-	-	-	-	-	-	61,300.0	108,011.7	21,257.7	130,338.5	132,436.3	152,976.8	606,321.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,099.0	\$ 3,675.2	\$ 730.7	\$ 4,419.0	\$ 4,487.0	\$ 5,156.2	\$ 20,567.0
Danskin Energy (MWh)	-	-	-	-	-	-	2,254.3	1,105.7	-	37.9	-	-	3,997.9
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 99.4	\$ 50.0	\$ -	\$ 1.7	\$ -	\$ -	\$ 151.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 550.1	\$ 500.9	\$ 437.1	\$ 452.9	\$ 437.5	\$ 451.5	\$ 5,212.5
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	5.4	1.9	-	-	-	-	7.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.2	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.2	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.3
Purchased Power (Excluding CSPP)	62,628.4	145.1	20,508.4	24,535.7	131,337.0	227,298.8	459,985.9	233,549.0	118,233.0	14,213.5	19,042.0	4,032.0	1,315,508.9
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	96,370.1	29,704.4	48,882.9	54,715.2	160,629.1	289,588.1	522,418.6	295,754.8	143,566.5	44,683.7	52,987.6	43,117.4	1,782,418.6
Market Cost (\$ x 1000)	\$ 1,573.5	\$ 3.6	\$ 591.9	\$ 723.6	\$ 3,779.7	\$ 5,794.4	\$ 15,878.0	\$ 8,362.7	\$ 4,093.9	\$ 405.4	\$ 497.2	\$ 112.8	\$ 41,816.7
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,881.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,416.4	\$ 1,619.4	\$ 1,734.3	\$ 1,934.7	\$ 4,957.7	\$ 10,449.9	\$ 20,859.5	\$ 13,366.5	\$ 5,480.4	\$ 2,071.4	\$ 2,722.4	\$ 2,672.3	\$ 71,284.9
Surplus Sales Energy (MWh)	52,523.8	252,751.7	194,026.8	143,568.2	41,094.8	3,935.8	-	3,525.7	29,927.3	134,914.6	118,752.7	236,559.6	1,211,581.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,721.6	\$ 7,657.0	\$ 5,322.3	\$ 4,028.2	\$ 997.5	\$ 104.5	\$ -	\$ 98.8	\$ 822.7	\$ 4,897.3	\$ 4,521.6	\$ 10,285.0	\$ 40,456.5
Transmission Costs (\$ x 1000)	\$ 1,525.5	\$ 252.8	\$ 194.0	\$ 143.6	\$ 41.1	\$ 3.9	\$ -	\$ 3.5	\$ 29.9	\$ 134.9	\$ 118.8	\$ 236.6	\$ 1,211.6
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,669.1	\$ 7,404.3	\$ 5,128.3	\$ 3,884.6	\$ 956.4	\$ 100.6	\$ -	\$ 95.2	\$ 792.8	\$ 4,762.4	\$ 4,402.8	\$ 10,048.4	\$ 39,244.9
Net Power Supply Expenses (\$ x 1000)	\$ 11,625.0	\$ 3,011.0	\$ 2,692.7	\$ 4,163.8	\$ 9,063.6	\$ 14,334.6	\$ 32,914.5	\$ 27,537.4	\$ 14,792.0	\$ 12,139.5	\$ 13,065.9	\$ 9,394.3	\$ 154,734.3



IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1970

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	1,079,887.0	1,103,528.0	848,781.2	1,021,338.0	1,116,262.8	1,288,202.3	786,720.2	670,424.2	622,856.4	535,340.3	524,900.7	893,563.0	10,471,804.1
Bridger Energy (MWh)	367,240.9	332,476.5	272,695.7	186,989.5	65,721.5	-	346,683.9	408,519.6	357,734.7	419,333.0	438,572.7	479,882.7	3,675,850.7
Cost (\$ x 1000)	\$ 8,218.4	\$ 7,423.0	\$ 6,173.9	\$ 4,232.5	\$ 1,496.1	\$ -	\$ 7,779.4	\$ 9,113.9	\$ 7,974.2	\$ 9,289.2	\$ 9,687.6	\$ 10,546.3	\$ 81,934.5
Boardman Energy (MWh)	28,860.0	27,851.4	32,789.3	14,786.5	-	17,462.7	38,984.9	38,560.7	36,649.5	36,708.5	34,917.1	38,300.8	345,871.2
Cost (\$ x 1000)	\$ 536.8	\$ 512.2	\$ 597.0	\$ 272.3	\$ -	\$ 332.0	\$ 691.9	\$ 685.4	\$ 653.0	\$ 657.0	\$ 626.5	\$ 681.4	\$ 6,245.4
Valmy Energy (MWh)	-	-	-	-	-	-	14,715.8	93,840.2	9,359.1	125,617.4	136,002.9	149,763.3	529,298.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 511.8	\$ 3,218.5	\$ 324.4	\$ 4,259.6	\$ 4,602.7	\$ 5,054.1	\$ 17,971.1
Danskin Energy (MWh)	-	-	-	-	-	-	393.8	656.9	-	54.3	-	-	1,105.1
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 16.4	\$ 28.1	\$ -	\$ 2.4	\$ -	\$ -	\$ 46.8
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 467.1	\$ 478.9	\$ 437.1	\$ 453.5	\$ 437.5	\$ 451.5	\$ 5,108.1
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	7,453.5	2.9	26,959.9	220.4	22,306.3	29,822.5	341,586.4	179,963.2	131,562.9	12,142.1	4,317.1	123.8	756,461.0
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	41,195.2	29,562.2	55,334.4	30,399.9	51,598.4	92,111.7	404,019.2	242,169.0	156,896.5	42,612.3	38,262.6	39,209.2	1,223,370.7
Market Cost (\$ x 1000)	\$ 216.1	\$ 0.1	\$ 800.6	\$ 6.8	\$ 624.3	\$ 720.8	\$ 11,205.6	\$ 6,091.3	\$ 4,598.1	\$ 401.1	\$ 115.6	\$ 3.4	\$ 24,783.7
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,059.0	\$ 1,616.0	\$ 1,942.9	\$ 1,218.0	\$ 1,802.2	\$ 5,376.2	\$ 16,187.1	\$ 11,095.1	\$ 5,984.6	\$ 2,067.2	\$ 2,340.8	\$ 2,562.9	\$ 54,251.9
Surplus Sales Energy (MWh)	268,897.8	440,544.8	181,334.4	327,305.6	101,151.9	130,906.9	85.6	8,944.3	26,310.6	168,662.9	130,486.7	339,915.6	2,124,547.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 8,001.0	\$ 12,328.5	\$ 5,073.5	\$ 8,061.4	\$ 2,385.6	\$ 1,626.2	\$ 2.4	\$ 259.0	\$ 719.8	\$ 5,962.7	\$ 4,868.1	\$ 13,834.5	\$ 63,122.5
Transmission Costs (\$ x 1000)	\$ 268.9	\$ 440.5	\$ 181.3	\$ 327.3	\$ 101.2	\$ 130.9	\$ 0.1	\$ 8.9	\$ 26.3	\$ 168.7	\$ 130.5	\$ 339.9	\$ 2,124.5
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 7,732.1	\$ 11,888.0	\$ 4,892.1	\$ 7,734.1	\$ 2,284.4	\$ 1,495.3	\$ 2.3	\$ 250.1	\$ 693.4	\$ 5,794.1	\$ 4,737.6	\$ 13,494.6	\$ 60,998.0
Net Power Supply Expenses (\$ x 1000)	\$ 3,427.9	\$ (2,022.4)	\$ 4,220.8	\$ (1,575.0)	\$ 1,464.2	\$ 4,649.6	\$ 25,635.0	\$ 24,341.6	\$ 14,679.8	\$ 10,932.4	\$ 12,957.5	\$ 5,801.6	\$ 104,512.9











IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1975

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	976,387.9	1,101,679.9	1,192,406.0	1,134,802.9	1,094,780.9	1,262,788.4	890,024.7	727,197.5	842,459.8	739,771.1	614,719.1	981,403.2	11,558,371.5
Bridger Energy (MWh)	233,691.2	235,725.6	169,007.6	31,799.8	42,427.7	25,496.8	289,981.3	352,780.6	264,803.9	382,194.7	388,729.4	422,335.9	2,838,974.6
Cost (\$ x 1000)	\$ 5,321.9	\$ 5,322.5	\$ 3,950.2	\$ 735.4	\$ 984.3	\$ 600.3	\$ 6,545.5	\$ 7,914.1	\$ 5,944.2	\$ 8,526.6	\$ 8,657.7	\$ 9,391.2	\$ 63,893.9
Boardman Energy (MWh)	27,805.9	26,469.8	26,740.1	13,912.1	-	9,132.3	34,856.8	37,384.7	35,859.0	33,606.0	30,700.4	30,599.3	307,066.3
Cost (\$ x 1000)	\$ 520.6	\$ 491.0	\$ 504.3	\$ 258.9	\$ -	\$ 174.8	\$ 625.6	\$ 667.3	\$ 640.9	\$ 609.5	\$ 561.9	\$ 563.4	\$ 5,618.3
Valmy Energy (MWh)	-	-	-	-	-	-	4,328.9	-	-	24,707.9	40,291.5	111,335.2	180,663.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 156.6	\$ -	\$ -	\$ 865.5	\$ 1,399.7	\$ 3,781.2	\$ 6,203.1
Danskin Energy (MWh)	-	-	-	-	-	-	1.3	21.0	0.3	4.7	-	-	27.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.0	\$ 0.8	\$ 0.0	\$ 0.2	\$ -	\$ -	\$ 1.1
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 451.6	\$ 437.1	\$ 451.4	\$ 437.5	\$ 451.5	\$ 5,062.4
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	74,384.9	396.0	-	-	37,943.3	27,104.8	310,341.4	269,254.5	89,856.4	12,145.2	31,365.6	11,145.4	863,937.5
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	108,126.6	29,955.3	28,374.5	30,179.5	67,235.4	89,394.0	372,774.2	331,460.4	115,189.9	42,615.4	65,311.2	50,230.8	1,330,847.2
Market Cost (\$ x 1000)	\$ 2,052.7	\$ 12.8	\$ -	\$ -	\$ 970.8	\$ 545.2	\$ 8,666.2	\$ 8,308.6	\$ 2,865.9	\$ 368.9	\$ 859.1	\$ 281.5	\$ 24,931.8
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,895.6	\$ 1,628.7	\$ 1,142.4	\$ 1,211.1	\$ 2,146.8	\$ 5,200.6	\$ 13,647.7	\$ 13,312.3	\$ 4,252.4	\$ 2,035.0	\$ 3,084.3	\$ 2,841.0	\$ 54,400.0
Surplus Sales Energy (MWh)	97,740.3	340,960.8	388,243.3	284,475.3	72,009.6	139,929.3	519.3	3,620.8	101,128.2	231,838.0	97,578.4	335,082.9	2,093,126.3
Revenue Including Transmission Costs (\$ x 1000)	\$ 2,899.3	\$ 8,755.1	\$ 8,787.4	\$ 5,997.8	\$ 1,468.5	\$ 1,580.9	\$ 14.1	\$ 93.6	\$ 2,566.1	\$ 7,344.2	\$ 3,302.0	\$ 11,752.0	\$ 54,561.0
Transmission Costs (\$ x 1000)	\$ 97.7	\$ 341.0	\$ 388.2	\$ 284.5	\$ 72.0	\$ 139.9	\$ 0.5	\$ 3.6	\$ 101.1	\$ 231.8	\$ 97.6	\$ 335.1	\$ 2,093.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 2,801.5	\$ 8,414.1	\$ 8,399.1	\$ 5,713.4	\$ 1,396.5	\$ 1,441.0	\$ 13.6	\$ 90.0	\$ 2,465.0	\$ 7,112.3	\$ 3,204.4	\$ 11,416.9	\$ 52,467.9
Net Power Supply Expenses (\$ x 1000)	\$ 7,282.4	\$ (657.5)	\$ (2,403.1)	\$ (3,071.7)	\$ 2,186.9	\$ 4,971.3	\$ 21,412.4	\$ 22,255.4	\$ 8,809.7	\$ 5,375.6	\$ 10,936.8	\$ 5,611.5	\$ 82,709.8



**IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS**

1977

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	684,088.1	659,287.3	674,327.4	454,493.5	556,920.7	505,444.7	535,335.4	450,031.2	419,094.8	425,292.8	408,041.2	561,148.7	6,333,505.8
Bridger Energy (MWh)	483,431.4	436,524.0	476,444.3	391,668.0	305,298.4	283,598.2	478,695.0	477,153.4	434,607.1	463,109.2	458,419.7	483,033.5	5,171,982.4
Cost (\$ x 1000)	\$ 10,617.5	\$ 9,587.5	\$ 10,477.2	\$ 8,657.7	\$ 6,813.5	\$ 6,355.9	\$ 10,522.4	\$ 10,491.5	\$ 9,608.0	\$ 10,209.6	\$ 10,086.0	\$ 10,609.5	\$ 114,036.3
Boardman Energy (MWh)	38,270.8	35,335.8	38,594.4	17,017.7	-	22,570.8	39,538.6	38,688.7	36,310.3	37,274.9	36,047.2	35,107.2	374,756.5
Cost (\$ x 1000)	\$ 680.9	\$ 626.8	\$ 685.9	\$ 306.5	\$ -	\$ 418.8	\$ 700.3	\$ 687.3	\$ 647.8	\$ 665.7	\$ 643.8	\$ 632.5	\$ 6,696.3
Valmy Energy (MWh)	154,872.9	135,565.9	73,085.9	23,840.2	14,575.3	-	134,924.3	152,868.2	141,645.0	152,004.1	150,254.7	158,886.3	1,292,522.8
Cost (\$ x 1000)	\$ 5,216.5	\$ 4,574.5	\$ 2,498.2	\$ 829.0	\$ 505.3	\$ -	\$ 4,576.7	\$ 5,152.8	\$ 4,786.8	\$ 5,125.1	\$ 5,060.0	\$ 5,343.9	\$ 43,668.8
Danskin Energy (MWh)	-	-	-	-	-	-	6,791.0	5,350.3	1,522.5	186.0	-	-	13,849.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 359.4	\$ 290.2	\$ 81.7	\$ 10.2	\$ -	\$ -	\$ 741.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 810.1	\$ 741.0	\$ 518.8	\$ 461.4	\$ 437.5	\$ 451.5	\$ 5,802.9
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	829.9	532.2	7.7	-	-	-	1,369.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 44.5	\$ 29.3	\$ 0.4	\$ -	\$ -	\$ -	\$ 74.1
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 44.5	\$ 29.3	\$ 0.4	\$ -	\$ -	\$ -	\$ 74.1
Purchased Power (Excluding CSPP)	670.2	-	101.6	52,699.5	231,879.4	372,918.0	333,160.9	269,295.4	147,123.5	4,841.6	10,417.0	33,558.4	1,456,665.6
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,472.0	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	34,411.9	29,559.2	28,476.1	82,879.1	261,171.6	435,207.3	395,593.7	331,501.3	172,457.0	35,311.8	44,362.6	72,643.8	1,923,575.3
Total Energy Excl. CSPP (MWh)	-	-	2.8	1,764.8	7,978.0	11,333.2	15,154.4	12,679.2	6,740.8	221.5	423.7	1,278.5	57,598.1
Market Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Contract Cost (\$ x 1000)	\$ 1,864.1	\$ 1,615.9	\$ 1,145.1	\$ 2,976.0	\$ 9,155.9	\$ 15,988.7	\$ 20,135.9	\$ 17,682.9	\$ 8,127.3	\$ 1,887.6	\$ 2,649.0	\$ 3,838.0	\$ 87,066.2
Total Cost Excl. CSPP (\$ x 1000)	146,808.2	243,419.5	262,654.4	43,701.2	5,540.4	-	279.3	10,899.5	48,452.9	122,167.7	54,951.1	50,004.8	988,879.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 5,991.0	\$ 9,723.8	\$ 9,031.2	\$ 1,425.1	\$ 135.7	\$ -	\$ 8.1	\$ 323.8	\$ 1,546.1	\$ 4,893.2	\$ 2,436.9	\$ 2,578.9	\$ 38,083.9
Transmission Costs (\$ x 1000)	\$ 146.8	\$ 243.4	\$ 262.7	\$ 43.7	\$ 5.5	\$ -	\$ 0.3	\$ 10.9	\$ 48.5	\$ 122.2	\$ 55.0	\$ 50.0	\$ 988.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 5,844.2	\$ 9,480.4	\$ 8,768.5	\$ 1,381.4	\$ 130.1	\$ -	\$ 7.9	\$ 312.9	\$ 1,497.6	\$ 4,771.1	\$ 2,382.0	\$ 2,528.9	\$ 37,105.1
Net Power Supply Expenses (\$ x 1000)	\$ 12,880.6	\$ 7,238.8	\$ 6,437.0	\$ 11,824.0	\$ 16,794.9	\$ 23,200.0	\$ 36,782.0	\$ 34,471.8	\$ 22,191.6	\$ 13,578.3	\$ 16,494.2	\$ 18,346.4	\$ 220,239.6

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1978

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	581,145.0	729,773.3	743,366.7	854,018.0	995,782.6	894,807.2	732,698.6	522,051.1	625,214.6	573,715.8	517,350.1	765,904.7	8,535,827.8
Bridger Energy (MWh)	429,413.0	377,385.5	329,648.2	152,983.6	142,472.3	147,693.3	392,473.1	424,272.1	388,701.5	429,927.6	424,641.8	476,489.8	4,116,101.8
Cost (\$ x 1000)	\$ 9,533.3	\$ 8,400.5	\$ 7,393.2	\$ 3,463.3	\$ 3,206.2	\$ 3,378.9	\$ 8,767.3	\$ 9,430.1	\$ 8,642.4	\$ 9,543.6	\$ 9,408.0	\$ 10,478.2	\$ 91,645.0
Boardman Energy (MWh)	29,744.7	27,740.6	32,231.1	12,840.6	-	20,556.2	38,132.2	37,070.2	36,094.9	34,309.3	31,628.1	35,083.6	335,431.4
Cost (\$ x 1000)	\$ 550.3	\$ 510.5	\$ 588.4	\$ 242.5	-	\$ 385.2	\$ 678.8	\$ 662.5	\$ 644.5	\$ 620.2	\$ 576.1	\$ 632.1	\$ 6,091.2
Valmy Energy (MWh)	10,598.2	-	-	-	-	-	53,298.9	107,549.8	55,885.0	133,069.0	134,932.4	152,039.6	647,372.8
Cost (\$ x 1000)	\$ 366.2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,826.3	\$ 3,658.0	\$ 1,915.9	\$ 4,512.9	\$ 4,568.6	\$ 5,126.5	\$ 21,974.4
Danskin Energy (MWh)	-	-	-	-	-	-	1.3	2,919.5	-	-	-	-	2,920.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ 133.3	\$ -	\$ -	\$ -	\$ -	\$ 133.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,194.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	3.1	-	-	-	-	3.1
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.1
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ -	\$ -	\$ -	\$ -	\$ 0.1
Purchased Power (Excluding CSPP)	165,338.5	12,876.0	36,637.0	19,548.2	46,860.7	141,499.9	312,510.6	292,226.4	87,082.6	4,319.8	15,882.6	7,624.3	1,142,406.5
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	199,080.2	42,435.2	65,011.5	49,727.7	76,152.8	203,789.1	374,943.3	354,432.3	112,416.2	34,790.0	49,828.2	46,709.7	1,609,316.2
Market Cost (\$ x 1000)	\$ 4,899.0	\$ 325.6	\$ 1,139.7	\$ 555.0	\$ 1,325.0	\$ 3,429.0	\$ 10,723.6	\$ 10,561.1	\$ 3,199.2	\$ 115.8	\$ 429.0	\$ 205.7	\$ 36,907.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.5	\$ 2,559.5	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 6,741.8	\$ 1,941.5	\$ 2,282.0	\$ 1,766.1	\$ 2,503.0	\$ 8,084.4	\$ 15,705.1	\$ 15,564.9	\$ 4,585.7	\$ 1,781.9	\$ 2,654.2	\$ 2,765.2	\$ 66,375.8
Surplus Sales	1,703.4	124,466.3	141,984.2	143,355.2	81,978.7	20,021.3	106.3	3,067.0	61,121.3	214,794.5	116,200.4	215,417.6	1,124,216.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 57.8	\$ 3,997.4	\$ 4,129.8	\$ 3,654.2	\$ 2,216.4	\$ 543.2	\$ 3.2	\$ 81.2	\$ 1,793.4	\$ 7,797.3	\$ 4,478.0	\$ 9,377.1	\$ 38,129.1
Transmission Costs (\$ x 1000)	\$ 1.7	\$ 124.5	\$ 142.0	\$ 143.4	\$ 82.0	\$ 20.0	\$ 0.1	\$ 3.1	\$ 61.1	\$ 214.8	\$ 116.2	\$ 215.4	\$ 1,124.2
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 56.1	\$ 3,873.0	\$ 3,987.8	\$ 3,510.8	\$ 2,134.4	\$ 523.2	\$ 3.1	\$ 78.1	\$ 1,732.3	\$ 7,582.5	\$ 4,361.8	\$ 9,161.7	\$ 37,004.9
Net Power Supply Expenses (\$ x 1000)	\$ 17,481.4	\$ 7,294.0	\$ 6,674.9	\$ 2,397.3	\$ 4,025.1	\$ 11,761.9	\$ 27,425.1	\$ 29,821.7	\$ 14,493.4	\$ 9,327.2	\$ 13,282.6	\$ 10,291.8	\$ 154,276.3





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1981

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	813,090.9	993,582.9	830,030.6	757,686.0	912,239.7	932,887.2	612,324.3	508,572.5	519,640.9	509,128.3	408,699.0	735,987.6	8,533,870.0
Bridger Energy (MWh)	407,004.5	364,791.5	289,299.5	222,715.6	131,943.6	88,178.4	392,957.9	442,656.9	392,831.2	440,095.6	452,187.6	482,946.2	4,107,608.5
Cost (\$ x 1000)	\$ 9,068.8	\$ 8,133.0	\$ 6,528.1	\$ 5,044.8	\$ 2,993.0	\$ 2,004.6	\$ 8,786.8	\$ 9,799.1	\$ 8,740.0	\$ 9,747.7	\$ 9,960.9	\$ 10,607.7	\$ 91,414.6
Boardman Energy (MWh)	29,115.4	27,461.8	28,826.1	13,668.0	-	22,154.3	37,722.3	38,663.5	36,085.5	35,841.0	35,604.6	39,217.1	344,359.6
Cost (\$ x 1000)	\$ 540.7	\$ 506.2	\$ 536.3	\$ 255.2	\$ -	\$ 415.7	\$ 672.5	\$ 686.9	\$ 644.4	\$ 643.7	\$ 637.0	\$ 695.4	\$ 6,234.1
Valmy Energy (MWh)	-	-	-	-	-	-	47,144.2	112,564.8	43,483.3	137,404.9	143,120.6	161,884.9	645,602.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,614.1	\$ 3,825.8	\$ 1,494.0	\$ 4,650.7	\$ 4,833.5	\$ 5,439.1	\$ 21,857.3
Danskin Energy (MWh)	-	-	-	-	-	-	943.1	4,460.4	228.0	-	-	-	5,631.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 42.0	\$ 203.6	\$ 10.3	\$ -	\$ -	\$ -	\$ 256.9
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 492.6	\$ 654.5	\$ 447.4	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,317.2
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	110.8	-	-	-	-	110.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.1	\$ -	\$ -	\$ -	\$ -	\$ 5.1
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.1	\$ -	\$ -	\$ -	\$ -	\$ 5.1
Purchased Power (Excluding CSPP)	52,105.5	1,536.2	27,720.0	27,024.2	108,224.3	160,632.6	437,918.6	279,159.5	157,550.5	4,349.8	19,288.6	1,879.0	1,277,368.8
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	85,847.2	31,095.4	56,094.5	57,203.7	137,516.4	222,921.8	500,351.3	341,365.4	182,884.1	34,820.0	53,214.2	40,964.4	1,744,278.5
Market Cost (\$ x 1000)	\$ 1,309.3	\$ 44.8	\$ 827.5	\$ 754.7	\$ 2,850.4	\$ 3,875.8	\$ 14,934.4	\$ 10,554.7	\$ 5,752.8	\$ 117.8	\$ 694.4	\$ 57.5	\$ 41,774.0
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,152.1	\$ 1,660.7	\$ 1,969.8	\$ 1,965.8	\$ 4,026.3	\$ 8,531.3	\$ 19,915.9	\$ 15,558.4	\$ 7,139.3	\$ 1,783.9	\$ 2,919.6	\$ 2,617.0	\$ 71,242.2
Surplus Sales	86,771.6	364,058.3	175,970.3	125,068.6	49,248.2	19,308.9	-	3,171.6	17,962.5	166,280.8	50,659.5	200,204.0	1,258,704.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 2,828.6	\$ 10,981.2	\$ 4,939.9	\$ 3,500.3	\$ 1,122.7	\$ 489.6	\$ -	\$ 85.4	\$ 487.0	\$ 6,184.6	\$ 2,022.2	\$ 9,098.7	\$ 41,730.2
Transmission Costs (\$ x 1000)	\$ 86.8	\$ 364.1	\$ 176.0	\$ 125.1	\$ 49.2	\$ 19.3	\$ -	\$ 3.2	\$ 18.0	\$ 166.3	\$ 50.7	\$ 200.2	\$ 1,258.7
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 2,741.8	\$ 10,617.2	\$ 4,764.0	\$ 3,375.2	\$ 1,073.4	\$ 480.3	\$ -	\$ 82.2	\$ 469.0	\$ 6,018.3	\$ 1,951.5	\$ 8,898.5	\$ 40,471.5
Net Power Supply Expenses (\$ x 1000)	\$ 10,365.6	\$ (2.8)	\$ 4,669.3	\$ 4,326.9	\$ 6,398.3	\$ 10,908.0	\$ 31,482.0	\$ 30,447.6	\$ 17,996.1	\$ 11,258.9	\$ 16,836.9	\$ 10,912.3	\$ 155,599.1

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1982

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	1,009,681.2	1,029,566.7	1,143,961.1	968,733.9	1,114,970.9	1,266,950.2	1,018,148.7	743,421.7	947,226.1	789,422.2	694,032.4	1,053,853.9	11,779,969.0
Bridger Energy (MWh)	185,331.6	98,572.6	16,556.6	18,426.3	-	-	228,509.7	313,599.4	169,740.4	382,934.3	401,787.4	452,772.0	2,268,230.2
Cost (\$ x 1000)	\$ 4,332.3	\$ 2,274.7	\$ 391.3	\$ 428.8	\$ -	\$ -	\$ 5,209.6	\$ 7,071.1	\$ 3,861.7	\$ 8,541.4	\$ 8,934.6	\$ 10,002.1	\$ 51,047.6
Boardman Energy (MWh)	23,724.9	16,468.4	19,913.9	10,468.2	-	959.9	35,252.9	36,717.9	35,734.2	35,643.8	33,086.4	37,822.5	285,793.0
Cost (\$ x 1000)	\$ 455.1	\$ 319.7	\$ 384.4	\$ 203.1	\$ -	\$ 18.3	\$ 631.6	\$ 657.1	\$ 639.0	\$ 640.7	\$ 598.5	\$ 674.1	\$ 5,221.6
Valmy Energy (MWh)	-	-	-	-	-	-	5,186.7	-	-	-	-	65,147.3	70,334.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 187.7	\$ -	\$ -	\$ -	\$ -	\$ 2,237.7	\$ 2,425.4
Danskin Energy (MWh)	-	-	-	-	-	-	3.7	4.1	3.8	29.1	2.0	21.3	63.9
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.1	\$ 0.1	\$ 0.1	\$ 1.1	\$ 0.1	\$ 1.0	\$ 2.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.8	\$ 451.0	\$ 437.3	\$ 452.2	\$ 437.5	\$ 452.5	\$ 5,063.9
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPPP)	65,910.8	6,160.6	92.8	5,393.5	35,659.5	32,882.7	248,201.6	294,963.4	107,461.9	8,336.8	13,042.3	549.8	818,655.7
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,432.8	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	99,652.5	35,719.8	28,467.3	35,573.1	64,951.7	95,171.9	310,634.3	357,169.3	132,795.4	38,807.0	46,987.9	39,635.2	1,285,665.4
Market Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 8,352.6	\$ 3,327.8	\$ 246.5	\$ 345.6	\$ 14.6	\$ 22,489.8
Contract Cost (\$ x 1000)	\$ 3,504.6	\$ 1,777.2	\$ 1,144.5	\$ 1,347.9	\$ 1,967.9	\$ 5,279.4	\$ 11,808.3	\$ 5,003.7	\$ 1,366.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 5,347.5	\$ 3,393.1	\$ 2,286.9	\$ 2,559.0	\$ 3,143.9	\$ 9,934.9	\$ 16,673.8	\$ 13,356.3	\$ 4,714.3	\$ 1,912.6	\$ 2,570.8	\$ 2,574.1	\$ 51,958.0
Surplus Sales Energy (MWh)	70,112.4	127,436.9	180,595.8	106,996.0	47,453.6	116,184.7	6,294.7	5,687.7	128,320.4	255,631.7	133,727.3	388,451.8	1,567,093.1
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,927.6	\$ 2,755.4	\$ 3,422.1	\$ 2,082.4	\$ 700.2	\$ 1,054.0	\$ 160.7	\$ 144.0	\$ 3,010.6	\$ 7,692.1	\$ 4,187.3	\$ 13,531.9	\$ 40,648.2
Transmission Costs (\$ x 1000)	\$ 70.1	\$ 127.4	\$ 180.6	\$ 107.0	\$ 47.5	\$ 116.2	\$ 6.3	\$ 5.7	\$ 128.3	\$ 255.8	\$ 133.7	\$ 388.5	\$ 1,567.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,857.5	\$ 2,627.9	\$ 3,241.5	\$ 1,955.4	\$ 652.7	\$ 937.8	\$ 154.4	\$ 138.3	\$ 2,862.3	\$ 7,436.2	\$ 4,053.5	\$ 13,143.5	\$ 39,081.1
Net Power Supply Expenses (\$ x 1000)	\$ 6,780.3	\$ 2,058.2	\$ (922.3)	\$ 460.8	\$ 1,765.5	\$ 4,796.4	\$ 18,133.7	\$ 21,397.3	\$ 6,770.0	\$ 4,110.7	\$ 8,487.8	\$ 2,797.0	\$ 76,635.4







IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1985

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	1,078,395.9	1,119,881.8	954,444.2	1,221,389.9	1,151,048.8	796,516.3	602,118.3	536,509.4	617,249.5	524,208.4	410,574.9	750,331.8	9,762,669.3
Bridger Energy (MWh)	358,733.3	345,465.4	296,594.1	42,501.0	34,161.8	71,529.0	357,922.5	406,904.2	372,484.0	438,862.3	447,092.9	479,115.4	3,651,365.9
Cost (\$ x 1000)	\$ 8,009.6	\$ 7,713.2	\$ 6,674.5	\$ 968.6	\$ 777.9	\$ 1,635.7	\$ 8,024.6	\$ 9,081.5	\$ 8,302.2	\$ 9,722.9	\$ 9,856.6	\$ 10,530.9	\$ 81,300.1
Boardman Energy (MWh)	28,906.5	27,381.5	37,193.9	13,581.2	-	21,746.3	39,146.8	37,463.9	36,570.1	36,501.2	35,303.3	37,003.1	350,797.8
Cost (\$ x 1000)	\$ 537.5	\$ 505.0	\$ 664.4	\$ 253.9	\$ -	\$ 403.4	\$ 694.3	\$ 668.6	\$ 651.8	\$ 653.8	\$ 632.4	\$ 661.5	\$ 6,326.6
Valmy Energy (MWh)	-	-	-	-	-	-	18,083.5	101,499.9	14,805.4	126,685.5	139,122.6	149,404.9	549,601.9
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 627.5	\$ 3,458.4	\$ 512.1	\$ 4,292.7	\$ 4,701.8	\$ 5,042.8	\$ 18,635.3
Danskin Energy (MWh)	-	-	-	-	-	-	2,873.8	1,885.4	-	93.8	-	-	4,853.1
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 120.3	\$ 80.9	\$ -	\$ 4.1	\$ -	\$ -	\$ 205.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 570.9	\$ 531.8	\$ 437.1	\$ 455.3	\$ 437.5	\$ 451.5	\$ 5,266.6
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	144.7	7.7	-	-	-	-	152.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6.1	\$ 0.3	\$ -	\$ -	\$ -	\$ -	\$ 6.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6.1	\$ 0.3	\$ -	\$ -	\$ -	\$ -	\$ 6.5
Purchased Power (Excluding CSPP)	15,120.7	-	6,032.2	-	20,060.1	302,478.5	508,706.7	301,021.7	119,973.7	3,255.3	23,755.8	6,716.2	1,307,120.8
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	48,862.4	29,559.2	34,406.7	30,179.5	49,352.2	364,767.7	571,139.4	363,227.6	145,307.2	33,725.5	57,701.4	45,801.6	1,774,030.5
Market Cost (\$ x 1000)	\$ 424.5	\$ -	\$ 188.5	\$ -	\$ 552.2	\$ 7,903.7	\$ 16,938.1	\$ 10,238.1	\$ 4,243.7	\$ 92.0	\$ 783.9	\$ 198.4	\$ 41,563.1
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,267.4	\$ 1,615.9	\$ 1,330.8	\$ 1,211.1	\$ 1,730.2	\$ 12,559.1	\$ 21,919.6	\$ 15,241.9	\$ 5,630.2	\$ 1,758.1	\$ 3,009.1	\$ 2,757.9	\$ 71,031.3
Surplus Sales Energy (MWh)	266,612.3	469,413.2	294,369.0	381,424.4	102,129.0	7,746.0	-	2,271.2	29,232.3	169,074.1	47,631.9	200,854.1	1,970,757.4
Revenue Including Transmission Costs (\$ x 1000)	\$ 7,949.0	\$ 13,162.0	\$ 7,994.3	\$ 8,576.3	\$ 2,314.5	\$ 185.6	\$ -	\$ 60.8	\$ 803.7	\$ 6,073.8	\$ 1,894.2	\$ 8,320.7	\$ 57,275.0
Transmission Costs (\$ x 1000)	\$ 266.6	\$ 469.4	\$ 294.4	\$ 381.4	\$ 102.1	\$ 7.7	\$ -	\$ 2.3	\$ 29.2	\$ 169.1	\$ 47.6	\$ 200.9	\$ 1,970.8
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 7,682.4	\$ 12,692.5	\$ 7,699.9	\$ 8,194.9	\$ 2,212.4	\$ 177.9	\$ -	\$ 58.5	\$ 774.5	\$ 5,904.7	\$ 1,786.6	\$ 8,119.8	\$ 55,304.3
Net Power Supply Expenses (\$ x 1000)	\$ 3,477.8	\$ (2,544.1)	\$ 1,368.9	\$ (5,325.0)	\$ 746.0	\$ 14,856.9	\$ 31,843.1	\$ 28,923.9	\$ 14,758.9	\$ 10,978.1	\$ 16,852.8	\$ 11,324.8	\$ 127,262.0

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1986

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	986,310.2	1,082,860.1	1,198,784.2	1,174,983.2	1,201,320.7	1,249,509.7	977,878.8	661,785.8	622,756.8	681,677.9	600,074.4	865,249.8	11,303,201.6
Bridger Energy (MWh)	291,312.0	137,792.2	42,304.7	27,327.1	-	15,404.4	309,195.5	379,330.3	325,151.1	394,731.4	432,984.2	477,392.9	2,832,925.9
Cost (\$ x 1000)	\$ 6,572.5	\$ 3,134.4	\$ 992.9	\$ 637.0	\$ -	\$ 353.4	\$ 6,970.4	\$ 8,490.0	\$ 7,259.9	\$ 8,776.2	\$ 9,560.7	\$ 10,496.3	\$ 63,245.7
Boardman Energy (MWh)	27,584.2	21,325.0	26,855.5	13,392.6	-	9,171.2	38,941.4	37,966.1	36,355.6	35,120.6	35,841.7	38,432.4	320,886.4
Cost (\$ x 1000)	\$ 517.2	\$ 406.1	\$ 506.1	\$ 251.0	\$ -	\$ 178.6	\$ 691.2	\$ 676.3	\$ 648.5	\$ 632.7	\$ 640.7	\$ 683.4	\$ 5,831.7
Valmy Energy (MWh)	-	-	-	-	-	-	4,478.7	11,342.7	-	100,428.8	95,370.1	145,844.5	357,464.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 161.4	\$ 390.6	\$ -	\$ 3,414.8	\$ 3,279.4	\$ 4,929.7	\$ 12,175.9
Danskin Energy (MWh)	-	-	-	-	-	-	175.1	695.7	0.0	50.8	-	-	921.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6.8	\$ 27.8	\$ 0.0	\$ 2.1	\$ -	\$ -	\$ 36.7
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 457.5	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 457.5	\$ 478.7	\$ 437.1	\$ 453.2	\$ 437.5	\$ 451.5	\$ 5,098.0
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	7.4	-	-	-	-	-	7.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 0.3
Purchased Power (Excluding CSPP)	51,769.9	906.3	-	-	10,779.0	32,596.6	205,631.4	293,437.6	188,993.6	11,022.2	5,761.4	1,417.4	782,315.5
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	85,511.7	30,465.6	28,374.5	30,179.5	40,071.2	94,885.9	268,064.1	355,643.5	194,327.1	41,492.4	39,706.9	40,502.8	1,249,225.2
Total Energy Excl. CSPP (MWh)	\$ 1,414.6	\$ 26.5	\$ -	\$ -	\$ 286.9	\$ 703.8	\$ 6,244.5	\$ 9,463.5	\$ 5,608.0	\$ 358.2	\$ 174.9	\$ 38.3	\$ 24,319.3
Market Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Contract Cost (\$ x 1000)	\$ 3,257.5	\$ 1,642.4	\$ 1,142.4	\$ 1,211.1	\$ 1,464.9	\$ 5,359.3	\$ 11,226.0	\$ 14,467.2	\$ 6,994.5	\$ 2,024.3	\$ 2,400.1	\$ 2,597.8	\$ 53,787.5
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,100.4	\$ 3,258.3	\$ 2,284.8	\$ 2,422.2	\$ 2,640.9	\$ 10,014.8	\$ 16,087.5	\$ 19,470.9	\$ 8,381.0	\$ 3,690.5	\$ 4,605.2	\$ 5,157.3	\$ 83,255.7
Surplus Sales Energy (MWh)	142,438.0	219,555.7	268,020.2	319,667.7	108,943.7	122,092.0	7,303.3	1,542.1	21,416.3	262,496.4	161,813.6	306,624.0	1,941,912.9
Revenue Including Transmission Costs (\$ x 1000)	\$ 4,173.8	\$ 5,326.0	\$ 5,872.9	\$ 6,783.5	\$ 2,112.6	\$ 1,474.3	\$ 200.2	\$ 38.5	\$ 584.2	\$ 8,719.9	\$ 5,750.5	\$ 12,060.8	\$ 53,097.3
Transmission Costs (\$ x 1000)	\$ 142.4	\$ 219.6	\$ 268.0	\$ 319.7	\$ 108.9	\$ 122.1	\$ 7.3	\$ 1.5	\$ 21.4	\$ 262.5	\$ 161.8	\$ 306.6	\$ 1,941.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 4,031.3	\$ 5,106.5	\$ 5,604.9	\$ 6,463.8	\$ 2,003.7	\$ 1,352.3	\$ 192.9	\$ 37.0	\$ 562.7	\$ 8,457.4	\$ 5,588.7	\$ 11,754.2	\$ 51,155.4
Net Power Supply Expenses (\$ x 1000)	\$ 6,661.7	\$ 390.9	\$ (2,564.4)	\$ (3,928.5)	\$ (88.5)	\$ 4,975.6	\$ 19,313.8	\$ 24,465.8	\$ 14,777.4	\$ 6,845.8	\$ 10,729.7	\$ 7,404.6	\$ 88,983.8

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1987

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	894,808.0	751,288.1	838,694.6	839,704.8	683,952.2	582,139.2	561,020.4	489,931.0	443,983.6	469,270.9	416,775.7	497,629.7	7,489,207.9
Bridger Energy (MWh)	461,521.9	432,851.7	438,792.0	323,835.9	287,697.7	258,286.6	449,956.0	467,454.7	414,863.9	435,179.2	449,259.1	479,651.1	4,899,349.9
Cost (\$ x 1000)	\$ 10,177.7	\$ 9,513.8	\$ 9,692.0	\$ 7,230.2	\$ 6,439.4	\$ 5,800.8	\$ 9,945.6	\$ 10,296.8	\$ 9,197.0	\$ 9,649.0	\$ 9,902.1	\$ 10,541.6	\$ 108,386.1
Boardman Energy (MWh)	33,158.6	34,435.8	38,244.7	15,060.5	-	21,270.8	39,344.7	38,752.0	35,545.2	34,181.7	33,208.4	33,692.3	356,894.6
Cost (\$ x 1000)	\$ 602.6	\$ 613.0	\$ 680.5	\$ 276.5	\$ -	\$ 396.1	\$ 697.4	\$ 688.3	\$ 636.1	\$ 618.3	\$ 600.3	\$ 610.8	\$ 6,419.9
Valmy Energy (MWh)	99,651.2	106,531.6	5,609.9	-	-	-	113,861.5	135,283.1	103,563.1	140,021.5	142,692.7	153,570.2	1,000,784.8
Cost (\$ x 1000)	\$ 3,415.5	\$ 3,639.1	\$ 200.9	\$ -	\$ -	\$ -	\$ 3,878.1	\$ 4,584.0	\$ 3,534.9	\$ 4,741.0	\$ 4,820.0	\$ 5,175.1	\$ 33,988.6
Danskin Energy (MWh)	-	-	-	-	-	-	2,614.1	5,870.5	617.0	-	-	-	9,101.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 127.4	\$ 293.5	\$ 30.5	\$ -	\$ -	\$ -	\$ 451.4
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 578.0	\$ 744.3	\$ 467.6	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,512.7
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	285.8	489.9	-	-	-	-	775.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14.1	\$ 24.8	\$ -	\$ -	\$ -	\$ -	\$ 38.9
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14.1	\$ 24.8	\$ -	\$ -	\$ -	\$ -	\$ 38.9
Purchased Power (Excluding CSPPP)													
Market Energy (MWh)	1,099.1	-	3,954.7	936.2	152,020.6	322,837.2	342,030.2	251,492.6	180,305.3	8,475.0	17,764.2	73,239.3	1,334,154.4
Contract Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPPP (MWh)	34,840.8	29,559.2	32,329.2	31,115.8	181,312.7	385,126.4	404,463.0	313,698.5	185,638.8	38,945.2	51,709.8	112,324.7	1,801,064.1
Market Cost (\$ x 1000)	\$ 30.7	\$ -	\$ 142.6	\$ 27.4	\$ 4,757.5	\$ 8,964.0	\$ 13,637.1	\$ 10,808.1	\$ 6,477.9	\$ 248.5	\$ 572.5	\$ 2,989.1	\$ 48,663.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPPP (\$ x 1000)	\$ 1,873.6	\$ 1,615.9	\$ 1,285.0	\$ 1,238.5	\$ 5,933.5	\$ 13,619.5	\$ 18,618.7	\$ 15,811.8	\$ 7,864.4	\$ 1,912.6	\$ 2,797.7	\$ 5,558.5	\$ 78,131.6
Surplus Sales													
Energy (MWh)	275,702.4	301,820.7	325,395.5	283,501.9	20,535.5	-	112.9	6,257.2	27,017.6	126,577.1	51,470.3	16,053.1	1,434,444.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 10,087.3	\$ 11,025.9	\$ 10,148.1	\$ 8,065.5	\$ 468.4	\$ -	\$ 3.0	\$ 183.9	\$ 805.2	\$ 4,885.4	\$ 2,181.3	\$ 743.5	\$ 48,595.5
Transmission Costs (\$ x 1000)	\$ 275.7	\$ 301.8	\$ 325.4	\$ 283.5	\$ 20.5	\$ -	\$ 0.1	\$ 6.3	\$ 27.0	\$ 126.6	\$ 51.5	\$ 16.1	\$ 1,434.4
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 9,811.6	\$ 10,724.0	\$ 9,822.7	\$ 7,782.0	\$ 447.8	\$ -	\$ 2.9	\$ 177.6	\$ 778.2	\$ 4,758.8	\$ 2,129.9	\$ 727.4	\$ 47,161.1
Net Power Supply Expenses (\$ x 1000)	\$ 6,603.6	\$ 4,972.2	\$ 2,434.8	\$ 1,399.5	\$ 12,379.3	\$ 20,253.0	\$ 33,728.9	\$ 31,972.5	\$ 20,922.0	\$ 12,613.2	\$ 16,427.7	\$ 21,610.1	\$ 185,316.8

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1988

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,211.3	538,881.5	684,701.4	578,132.2	653,834.5	591,015.2	529,990.5	444,477.7	433,196.1	412,502.4	408,854.0	487,140.7	6,282,937.4
Bridger Energy (MWh)	465,476.4	436,263.3	470,704.4	373,970.5	300,194.7	278,191.3	473,106.5	476,186.2	434,805.5	457,068.9	441,223.0	481,942.2	5,089,132.8
Cost (\$ x 1000)	\$ 10,257.1	\$ 9,582.3	\$ 10,362.0	\$ 8,302.5	\$ 6,711.1	\$ 6,236.3	\$ 10,410.3	\$ 10,472.1	\$ 9,612.0	\$ 10,088.4	\$ 9,740.8	\$ 10,587.6	\$ 112,362.4
Boardman Energy (MWh)	31,626.2	34,577.7	38,024.5	16,142.4	-	21,647.7	39,417.8	38,773.7	36,491.9	36,408.4	32,479.7	34,365.0	359,954.9
Cost (\$ x 1000)	\$ 579.2	\$ 615.2	\$ 677.1	\$ 293.1	\$ -	\$ 401.9	\$ 698.5	\$ 688.6	\$ 650.6	\$ 652.4	\$ 589.2	\$ 621.1	\$ 6,466.8
Valmy Energy (MWh)	140,602.7	135,975.0	53,602.7	6,367.0	-	-	134,266.1	151,841.1	141,948.2	149,694.8	142,771.4	157,394.6	1,214,463.5
Cost (\$ x 1000)	\$ 4,753.7	\$ 4,587.5	\$ 1,839.7	\$ 222.2	\$ -	\$ -	\$ 4,555.8	\$ 5,120.2	\$ 4,796.5	\$ 5,051.9	\$ 4,822.4	\$ 5,296.5	\$ 41,046.3
Danskin Energy (MWh)	-	-	-	-	-	-	6,751.2	6,702.9	1,128.9	96.6	-	-	14,679.6
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 351.7	\$ 357.4	\$ 59.6	\$ 5.2	\$ -	\$ -	\$ 773.9
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 802.3	\$ 808.3	\$ 496.7	\$ 456.4	\$ 437.5	\$ 451.5	\$ 5,835.2
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	910.2	696.8	-	-	-	-	1,607.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 48.0	\$ 37.7	\$ -	\$ -	\$ -	\$ -	\$ 85.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 48.0	\$ 37.7	\$ -	\$ -	\$ -	\$ -	\$ 85.6
Purchased Power (Excluding CSPP)	70,589.0	292.3	215.5	20,688.0	163,949.7	293,679.3	344,576.0	275,044.2	138,207.9	7,172.3	26,616.3	71,051.8	1,412,052.3
Market Energy (MWh)	33,741.7	29,589.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	104,330.8	29,851.5	28,590.0	50,837.5	193,241.9	355,968.5	407,008.8	337,250.0	163,541.4	37,642.5	60,561.8	110,137.1	1,878,962.0
Market Cost (\$ x 1000)	\$ 2,242.1	\$ 8.3	\$ 5.9	\$ 609.7	\$ 5,467.4	\$ 8,804.1	\$ 15,281.9	\$ 12,776.9	\$ 6,263.4	\$ 320.2	\$ 824.4	\$ 3,189.0	\$ 55,793.1
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,084.9	\$ 1,624.2	\$ 1,148.2	\$ 1,820.8	\$ 6,643.3	\$ 13,459.5	\$ 20,263.4	\$ 17,780.7	\$ 7,649.9	\$ 1,986.3	\$ 3,049.6	\$ 5,748.4	\$ 85,261.2
Surplus Sales Energy (MWh)	13,965.0	122,694.7	247,346.1	99,246.3	14,838.8	-	21.7	10,705.7	53,922.8	102,399.4	43,707.4	10,164.8	719,012.8
Revenue Including Transmission Costs (\$ x 1000)	\$ 536.9	\$ 4,773.4	\$ 8,260.8	\$ 3,207.1	\$ 333.0	\$ -	\$ 0.7	\$ 325.6	\$ 1,723.1	\$ 4,035.6	\$ 1,910.8	\$ 485.7	\$ 25,925.5
Transmission Costs (\$ x 1000)	\$ 14.0	\$ 122.7	\$ 247.3	\$ 99.2	\$ 14.8	\$ -	\$ 0.0	\$ 10.7	\$ 53.9	\$ 102.4	\$ 43.7	\$ 10.2	\$ 719.0
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 522.9	\$ 4,650.7	\$ 8,013.4	\$ 3,107.8	\$ 318.2	\$ -	\$ 0.7	\$ 314.9	\$ 1,669.2	\$ 3,933.2	\$ 1,867.1	\$ 475.5	\$ 24,873.5
Net Power Supply Expenses (\$ x 1000)	\$ 19,497.7	\$ 12,072.8	\$ 6,412.8	\$ 7,967.0	\$ 13,488.6	\$ 20,534.3	\$ 36,777.5	\$ 34,592.6	\$ 21,536.5	\$ 14,302.1	\$ 16,772.4	\$ 22,229.7	\$ 226,184.1







**IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS**

1991

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,263.9	582,265.4	659,443.2	472,287.6	722,939.0	751,310.5	564,710.2	471,755.7	444,049.5	434,662.6	412,721.1	489,663.4	6,526,072.3
Bridger Energy (MWh)	407,666.7	352,877.2	354,307.2	250,280.7	243,237.3	261,996.3	438,339.5	468,399.9	430,032.8	455,067.0	453,751.4	482,762.4	4,598,718.4
Cost (\$ x 1000)	\$ 9,082.1	\$ 7,879.1	\$ 7,922.6	\$ 5,628.2	\$ 5,457.0	\$ 5,886.7	\$ 9,700.2	\$ 10,315.8	\$ 9,516.2	\$ 10,048.2	\$ 9,992.3	\$ 10,604.1	\$ 102,032.2
Boardman Energy (MWh)	23,274.6	25,907.4	28,454.0	8,751.4	-	24,271.6	39,021.0	38,266.4	36,798.1	36,799.7	35,000.3	38,634.1	335,178.5
Cost (\$ x 1000)	\$ 440.3	\$ 482.4	\$ 530.6	\$ 169.8	\$ -	\$ 448.2	\$ 692.4	\$ 680.9	\$ 655.3	\$ 658.4	\$ 627.8	\$ 686.5	\$ 6,072.5
Valmy Energy (MWh)	78,291.9	72,143.1	811.7	-	-	-	122,089.2	144,558.4	119,048.2	148,409.4	146,312.3	165,390.0	997,054.1
Cost (\$ x 1000)	\$ 2,696.9	\$ 2,462.3	\$ 29.4	\$ -	\$ -	\$ -	\$ 4,142.7	\$ 4,884.2	\$ 4,054.0	\$ 5,011.0	\$ 4,934.9	\$ 5,550.6	\$ 33,766.0
Danskin Energy (MWh)	-	-	-	-	-	-	2,956.1	5,280.9	665.1	6.9	-	-	8,909.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 146.6	\$ 268.8	\$ 33.5	\$ 0.4	\$ -	\$ -	\$ 449.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 597.3	\$ 719.6	\$ 470.6	\$ 451.5	\$ 437.5	\$ 451.5	\$ 5,510.6
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	38.1	295.8	-	-	-	-	333.9
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1.9	\$ 15.3	\$ -	\$ -	\$ -	\$ -	\$ 17.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1.9	\$ 15.3	\$ -	\$ -	\$ -	\$ -	\$ 17.2
Purchased Power (Excluding CSPP)	187,621.6	63,050.5	54,794.3	177,118.6	160,156.4	153,100.9	361,903.1	263,934.8	141,622.5	4,964.9	11,617.9	59,278.0	1,639,163.5
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	221,363.4	92,609.7	83,168.7	207,288.2	189,448.5	215,390.2	424,335.9	326,140.7	166,956.1	35,435.1	45,563.5	98,363.3	2,106,073.2
Market Cost (\$ x 1000)	\$ 4,905.2	\$ 1,506.8	\$ 1,464.6	\$ 4,778.3	\$ 4,631.2	\$ 4,517.8	\$ 14,398.0	\$ 11,406.7	\$ 6,063.6	\$ 198.1	\$ 411.5	\$ 2,851.6	\$ 57,133.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 6,748.0	\$ 3,122.7	\$ 2,607.0	\$ 5,989.5	\$ 5,809.2	\$ 9,173.3	\$ 19,379.5	\$ 16,410.4	\$ 7,450.1	\$ 1,864.2	\$ 2,636.7	\$ 5,411.1	\$ 86,601.7
Surplus Sales	2,554.3	72,917.1	97,888.5	12,390.7	23,169.0	6,148.0	52.9	9,470.5	40,362.0	119,369.8	51,176.5	14,014.3	449,513.6
Revenue Including Transmission Costs (\$ x 1000)	\$ 96.8	\$ 2,545.1	\$ 2,949.8	\$ 327.5	\$ 432.8	\$ 153.7	\$ 1.4	\$ 278.8	\$ 1,235.3	\$ 4,617.5	\$ 2,201.3	\$ 650.5	\$ 15,490.7
Transmission Costs (\$ x 1000)	\$ 2.6	\$ 72.9	\$ 97.9	\$ 12.4	\$ 23.2	\$ 6.1	\$ 0.1	\$ 9.5	\$ 40.4	\$ 119.4	\$ 51.2	\$ 14.0	\$ 449.5
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 94.2	\$ 2,472.2	\$ 2,851.9	\$ 315.2	\$ 409.7	\$ 147.5	\$ 1.4	\$ 269.3	\$ 1,195.0	\$ 4,498.1	\$ 2,150.2	\$ 636.5	\$ 15,041.2
Net Power Supply Expenses (\$ x 1000)	\$ 19,218.9	\$ 11,788.8	\$ 8,636.6	\$ 11,908.6	\$ 11,306.8	\$ 15,797.2	\$ 34,512.6	\$ 32,756.8	\$ 20,951.3	\$ 13,535.2	\$ 16,479.0	\$ 22,067.3	\$ 218,959.1



IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1993

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,439.9	565,154.9	988,242.6	972,486.9	1,141,588.6	1,175,650.8	699,849.9	608,533.6	560,202.4	531,182.4	410,080.0	688,383.0	8,861,795.0
Bridger Energy (MWh)	482,815.5	433,165.7	379,077.3	320,349.5	192,655.6	175,525.3	412,374.5	454,565.7	404,761.8	441,289.6	455,168.7	483,102.0	4,634,851.0
Cost (\$ x 1000)	\$ 10,805.1	\$ 9,520.1	\$ 8,430.8	\$ 7,137.5	\$ 4,325.9	\$ 3,976.2	\$ 9,183.0	\$ 10,038.1	\$ 8,979.5	\$ 9,771.7	\$ 10,020.7	\$ 10,610.9	\$ 102,599.5
Boardman Energy (MWh)	36,904.0	33,157.8	37,599.2	16,128.8	-	20,652.3	38,250.0	38,465.4	36,725.8	36,047.5	35,668.1	38,035.0	367,634.0
Cost (\$ x 1000)	\$ 660.0	\$ 593.4	\$ 670.6	\$ 292.9	\$ -	\$ 386.6	\$ 680.6	\$ 683.9	\$ 654.2	\$ 646.9	\$ 638.0	\$ 677.3	\$ 6,584.4
Valmy Energy (MWh)	104,013.4	87,975.2	1,082.2	-	-	-	91,162.6	121,547.0	87,390.9	143,009.7	145,593.0	161,384.1	943,158.2
Cost (\$ x 1000)	\$ 3,558.9	\$ 3,017.3	\$ 39.2	\$ -	\$ -	\$ -	\$ 3,113.6	\$ 4,131.3	\$ 2,987.5	\$ 4,836.3	\$ 4,912.1	\$ 5,423.2	\$ 32,019.4
Danskin Energy (MWh)	-	-	-	-	-	-	71.8	1,614.2	-	-	-	-	1,686.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3.3	\$ 76.9	\$ -	\$ -	\$ -	\$ -	\$ 80.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 454.0	\$ 527.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,141.6
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	79,434.6	4,062.9	1,884.0	106.8	12,879.8	6,202.0	287,359.2	171,362.9	103,246.5	2,247.2	13,437.8	3,873.5	686,097.1
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	113,176.3	33,622.2	30,258.5	30,286.3	42,171.9	68,491.2	349,791.9	233,568.7	128,580.0	32,717.4	47,383.4	42,958.9	1,153,006.8
Market Cost (\$ x 1000)	\$ 2,737.8	\$ 1,317.7	\$ 64.7	\$ 3.2	\$ 383.0	\$ 144.0	\$ 10,342.2	\$ 6,872.7	\$ 3,986.8	\$ 61.7	\$ 504.5	\$ 127.3	\$ 25,359.6
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,881.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 4,580.7	\$ 1,747.6	\$ 1,207.1	\$ 1,214.3	\$ 1,561.0	\$ 4,799.5	\$ 15,323.7	\$ 11,876.5	\$ 5,373.3	\$ 1,727.8	\$ 2,729.7	\$ 2,686.8	\$ 54,827.8
Surplus Sales	9,087.6	100,223.5	407,978.6	413,040.6	243,966.9	193,470.7	59.8	13,066.7	60,470.3	193,237.0	51,726.4	153,063.0	1,839,391.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 357.8	\$ 3,607.3	\$ 11,740.9	\$ 11,230.1	\$ 6,055.2	\$ 4,484.9	\$ 1.7	\$ 389.4	\$ 1,847.4	\$ 7,508.8	\$ 2,186.4	\$ 7,152.2	\$ 56,510.0
Transmission Costs (\$ x 1000)	\$ 9.1	\$ 100.2	\$ 408.0	\$ 413.0	\$ 244.0	\$ 193.5	\$ 0.1	\$ 13.1	\$ 60.5	\$ 193.2	\$ 51.7	\$ 153.1	\$ 1,539.4
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 348.7	\$ 3,507.1	\$ 11,332.9	\$ 10,817.1	\$ 5,811.2	\$ 4,291.5	\$ 1.6	\$ 376.4	\$ 1,787.0	\$ 7,313.5	\$ 2,084.7	\$ 6,999.1	\$ 54,870.6
Net Power Supply Expenses (\$ x 1000)	\$ 19,401.8	\$ 11,685.8	\$ (586.2)	\$ (1,736.1)	\$ 526.0	\$ 5,307.5	\$ 28,753.4	\$ 26,881.2	\$ 16,644.7	\$ 10,120.3	\$ 16,653.2	\$ 12,850.6	\$ 146,502.1





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1996

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	1,116,245.0	1,098,326.8	1,176,928.7	994,448.3	1,099,455.3	1,321,670.0	766,070.5	665,518.0	669,787.6	509,956.7	456,375.3	1,030,118.2	10,904,900.5
Bridger Energy (MWh)	155,455.3	81,954.5	17,310.9	15,139.8	-	-	224,871.0	309,332.5	207,218.3	400,952.5	404,966.1	452,825.8	2,270,026.5
Cost (\$ x 1000)	\$ 3,637.0	\$ 1,899.4	\$ 400.3	\$ 362.9	\$ -	\$ -	\$ 5,124.3	\$ 6,981.8	\$ 4,693.8	\$ 8,917.8	\$ 8,988.9	\$ 10,003.2	\$ 50,989.3
Boardman Energy (MWh)	24,772.8	21,976.0	10,688.3	9,441.5	-	-	31,844.5	36,608.9	36,285.0	35,265.2	34,981.5	37,187.0	279,030.7
Cost (\$ x 1000)	\$ 474.2	\$ 422.2	\$ 213.8	\$ 182.7	\$ -	\$ -	\$ 574.5	\$ 655.5	\$ 647.4	\$ 634.9	\$ 627.2	\$ 664.3	\$ 5,096.6
Valmy Energy (MWh)	-	-	-	-	-	-	7,395.1	-	-	20,196.9	2,190.5	58,653.2	88,435.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 267.3	\$ -	\$ -	\$ 712.2	\$ 77.9	\$ 2,015.6	\$ 3,073.1
Danskin Energy (MWh)	-	-	-	-	-	-	253.2	3.4	0.2	806.8	229.9	-	1,293.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8.8	\$ 0.1	\$ 0.0	\$ 29.1	\$ 9.2	\$ -	\$ 47.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 459.5	\$ 451.0	\$ 437.1	\$ 480.3	\$ 446.6	\$ 451.5	\$ 5,108.6
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	54.0	-	-	54.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2.0	\$ -	\$ -	\$ 2.0
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2.0	\$ -	\$ -	\$ 2.0
Purchased Power (Excluding CSPP)													
Market Energy (MWh)	32,726.9	978.4	-	1,617.9	47,272.9	25,541.9	498,570.8	372,916.8	239,986.4	40,822.9	118,062.4	363.9	1,378,861.3
Contract Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPP (MWh)	66,468.6	30,537.7	28,374.5	31,797.4	76,565.1	87,831.2	561,003.6	435,122.6	265,319.9	71,293.1	152,008.0	39,449.3	1,845,771.0
Market Cost (\$ x 1000)	\$ 821.2	\$ 25.3	\$ -	\$ 40.6	\$ 1,009.0	\$ 458.2	\$ 13,440.5	\$ 10,595.2	\$ 7,187.6	\$ 1,269.9	\$ 3,742.8	\$ 9.9	\$ 38,600.2
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,396.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,664.0	\$ 1,641.2	\$ 1,142.4	\$ 1,251.7	\$ 2,187.0	\$ 5,113.6	\$ 18,422.0	\$ 15,598.9	\$ 8,574.1	\$ 2,936.0	\$ 5,985.0	\$ 2,569.4	\$ 68,068.4
Surplus Sales													
Energy (MWh)	114,666.2	179,912.7	204,982.2	124,604.9	43,550.0	162,594.0	-	1,363.1	21,447.9	47,539.2	8,577.2	357,433.1	1,266,670.5
Revenue Including Transmission Costs (\$ x 1000)	\$ 3,037.1	\$ 3,928.1	\$ 3,437.0	\$ 2,178.9	\$ 623.6	\$ 1,280.7	\$ -	\$ 31.2	\$ 554.7	\$ 1,429.5	\$ 267.4	\$ 12,278.1	\$ 29,046.3
Transmission Costs (\$ x 1000)	\$ 114.7	\$ 179.9	\$ 205.0	\$ 124.6	\$ 43.5	\$ 162.6	\$ -	\$ 1.4	\$ 21.4	\$ 47.5	\$ 8.6	\$ 357.4	\$ 1,266.7
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 2,922.5	\$ 3,748.2	\$ 3,232.0	\$ 2,054.3	\$ 580.0	\$ 1,118.1	\$ -	\$ 29.9	\$ 533.3	\$ 1,382.0	\$ 258.8	\$ 11,920.7	\$ 27,779.6
Net Power Supply Expenses (\$ x 1000)	\$ 4,198.6	\$ 529.1	\$ (1,076.5)	\$ 179.3	\$ 2,057.3	\$ 4,432.2	\$ 24,847.6	\$ 23,657.3	\$ 13,819.2	\$ 12,301.2	\$ 15,829.8	\$ 3,783.4	\$ 104,558.4







IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

1999

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	1,062,419.8	1,170,791.7	1,169,666.0	986,128.3	1,023,595.3	1,262,368.0	757,392.3	606,413.9	666,588.6	521,033.6	482,588.0	829,056.8	10,537,982.3
Bridger Energy (MWh)	155,206.7	19,286.1	82,161.8	18,277.5	13,651.8	-	286,982.3	328,378.8	189,646.2	352,366.0	368,893.5	445,486.1	2,260,336.8
Cost (\$ x 1000)	\$ 3,631.7	\$ 442.4	\$ 1,946.5	\$ 425.9	\$ 318.3	-	\$ 6,513.5	\$ 7,382.5	\$ 4,353.4	\$ 7,894.7	\$ 8,242.4	\$ 9,855.9	\$ 51,007.2
Boardman Energy (MWh)	22,196.9	23,671.1	25,863.8	11,824.5	-	4,195.5	36,540.0	38,585.1	32,678.5	30,092.4	28,969.9	35,300.6	289,918.2
Cost (\$ x 1000)	\$ 424.4	\$ 448.1	\$ 487.8	\$ 227.0	-	\$ 79.7	\$ 654.4	\$ 685.7	\$ 592.2	\$ 555.7	\$ 535.4	\$ 635.4	\$ 5,325.9
Valmy Energy (MWh)	-	-	-	-	-	-	9,108.7	-	-	-	-	-	98,464.4
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 329.6	\$ -	\$ -	\$ -	\$ -	\$ 3,080.3	\$ 3,409.9
Danskin Energy (MWh)	-	-	-	-	-	-	174.9	564.1	0.1	0.2	-	-	739.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6.3	\$ 20.7	\$ 0.0	\$ 0.0	\$ -	\$ -	\$ 26.9
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 456.9	\$ 471.5	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,088.3
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)	55,857.7	236.8	-	2,787.7	94,777.1	39,057.4	438,805.1	410,070.1	282,154.9	83,305.8	131,876.7	25,501.5	1,544,430.8
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	89,599.5	29,796.0	28,374.5	32,967.3	124,069.2	101,346.7	501,237.8	472,276.0	287,488.5	113,776.0	165,822.2	64,586.9	2,011,340.5
Market Cost (\$ x 1000)	\$ 1,367.2	\$ 6.2	\$ -	\$ 72.8	\$ 2,363.7	\$ 783.4	\$ 12,148.3	\$ 12,415.7	\$ 7,676.5	\$ 2,359.5	\$ 3,778.1	\$ 688.6	\$ 43,660.1
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,210.1	\$ 1,622.1	\$ 1,142.4	\$ 1,283.9	\$ 3,541.6	\$ 5,438.9	\$ 17,129.8	\$ 17,419.5	\$ 9,063.0	\$ 4,025.6	\$ 6,003.3	\$ 3,248.0	\$ 73,128.2
Surplus Sales	81,139.3	190,662.2	277,772.4	122,986.3	28,891.4	121,025.7	-	1,005.1	19,192.2	26,259.8	4,079.9	202,984.1	1,075,998.4
Revenue Including Transmission Costs (\$ x 1000)	\$ 2,167.1	\$ 4,179.7	\$ 5,757.3	\$ 2,407.1	\$ 499.8	\$ 1,156.4	\$ -	\$ 24.0	\$ 459.2	\$ 776.9	\$ 127.0	\$ 7,369.3	\$ 24,923.7
Transmission Costs (\$ x 1000)	\$ 81.1	\$ 190.7	\$ 277.8	\$ 123.0	\$ 28.9	\$ 121.0	\$ -	\$ 19.2	\$ 19.2	\$ 26.3	\$ 4.1	\$ 203.0	\$ 1,076.0
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 2,085.9	\$ 3,989.0	\$ 5,479.5	\$ 2,284.1	\$ 470.9	\$ 1,035.4	\$ -	\$ 23.0	\$ 440.0	\$ 750.6	\$ 122.9	\$ 7,166.3	\$ 23,847.7
Net Power Supply Expenses (\$ x 1000)	\$ 5,526.1	\$ (1,162.0)	\$ (1,503.7)	\$ 88.9	\$ 3,839.3	\$ 4,919.8	\$ 25,084.3	\$ 25,936.3	\$ 14,005.7	\$ 12,176.5	\$ 15,095.7	\$ 10,104.9	\$ 114,111.8





IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2002

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,276.4	526,048.8	588,856.0	725,077.4	663,101.2	585,091.1	573,949.8	466,622.6	443,981.8	429,762.8	399,988.0	472,252.7	6,395,010.5
Bridger Energy (MWh)	443,094.1	381,124.7	378,844.2	344,948.2	293,438.6	261,361.0	442,079.4	463,240.1	412,329.4	436,797.0	432,684.5	483,170.7	4,773,111.9
Cost (\$ x 1000)	\$ 9,807.9	\$ 8,475.6	\$ 8,459.3	\$ 7,680.0	\$ 6,575.5	\$ 5,864.4	\$ 9,787.5	\$ 10,212.2	\$ 9,160.9	\$ 9,681.5	\$ 9,569.4	\$ 10,612.3	\$ 105,866.5
Boardman Energy (MWh)	30,098.4	27,030.7	28,938.3	15,073.4	-	19,546.5	37,824.7	37,780.2	33,606.1	33,948.3	31,405.6	37,603.6	332,855.8
Cost (\$ x 1000)	\$ 555.8	\$ 499.6	\$ 538.0	\$ 276.7	\$ -	\$ 366.6	\$ 674.1	\$ 673.4	\$ 606.4	\$ 614.7	\$ 572.7	\$ 670.7	\$ 6,048.7
Valmy Energy (MWh)	125,089.3	110,200.8	6,536.6	-	-	-	118,333.8	143,454.1	106,608.6	141,668.8	139,970.1	164,630.0	1,056,492.1
Cost (\$ x 1000)	\$ 4,236.9	\$ 3,740.4	\$ 232.3	\$ -	\$ -	\$ -	\$ 4,017.0	\$ 4,849.1	\$ 3,634.9	\$ 4,793.3	\$ 4,733.5	\$ 5,526.4	\$ 35,763.8
Danskin Energy (MWh)	-	-	-	-	-	-	1,361.4	6,032.7	646.4	-	-	-	8,040.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 68.2	\$ 310.1	\$ 32.9	\$ -	\$ -	\$ -	\$ 411.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 518.9	\$ 761.0	\$ 470.0	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,472.5
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	-	378.0	-	-	-	-	378.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19.7	\$ -	\$ -	\$ -	\$ -	\$ 19.7
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 19.7	\$ -	\$ -	\$ -	\$ -	\$ 19.7
Purchased Power (Excluding CSPP) Market Energy (MWh)	108,860.3	48,550.1	61,242.2	7,635.7	162,057.5	318,542.6	355,462.3	273,311.4	155,897.4	11,361.5	40,513.6	73,630.1	1,617,064.6
Contract Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPP (MWh)	142,602.0	78,109.3	89,616.7	37,815.2	191,349.6	380,831.8	417,895.0	335,517.3	181,230.9	41,831.7	74,459.1	112,715.5	2,083,974.3
Market Cost (\$ x 1000)	\$ 3,231.5	\$ 1,231.3	\$ 1,667.7	\$ 213.3	\$ 5,008.9	\$ 8,796.7	\$ 13,964.9	\$ 11,709.5	\$ 6,288.8	\$ 369.5	\$ 1,245.3	\$ 3,571.7	\$ 57,299.2
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 5,074.4	\$ 2,847.2	\$ 2,810.1	\$ 1,424.4	\$ 6,186.9	\$ 13,452.2	\$ 18,846.4	\$ 16,713.2	\$ 7,675.3	\$ 2,035.6	\$ 3,470.5	\$ 6,131.2	\$ 86,767.3
Surplus Sales Energy (MWh)	12,874.5	69,644.4	64,502.3	196,703.9	15,455.0	1.0	-	7,794.6	21,202.3	92,984.6	36,322.7	9,571.7	527,057.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 475.7	\$ 2,634.4	\$ 1,992.3	\$ 5,916.3	\$ 341.1	\$ 0.0	\$ -	\$ 226.2	\$ 643.1	\$ 3,617.5	\$ 1,547.5	\$ 449.9	\$ 17,844.1
Transmission Costs (\$ x 1000)	\$ 12.9	\$ 69.6	\$ 64.5	\$ 196.7	\$ 16.5	\$ 0.0	\$ -	\$ 7.8	\$ 21.2	\$ 93.0	\$ 36.3	\$ 9.6	\$ 527.1
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 462.8	\$ 2,564.8	\$ 1,927.7	\$ 5,719.6	\$ 325.6	\$ 0.0	\$ -	\$ 218.4	\$ 621.9	\$ 3,524.5	\$ 1,511.2	\$ 440.3	\$ 17,317.1
Net Power Supply Expenses (\$ x 1000)	\$ 19,557.9	\$ 13,312.4	\$ 10,511.0	\$ 4,097.8	\$ 12,887.0	\$ 20,119.8	\$ 33,943.9	\$ 33,010.1	\$ 20,925.6	\$ 14,051.8	\$ 17,272.4	\$ 22,951.8	\$ 222,641.5

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2003

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	540,878.9	558,135.4	528,137.4	595,096.9	845,654.6	745,203.7	557,057.9	484,106.6	444,003.9	437,568.8	400,987.7	477,382.9	6,614,214.5
Bridger Energy (MWh)	483,371.9	435,303.5	476,900.6	384,720.6	292,653.8	277,480.7	467,088.6	477,526.9	433,752.8	454,070.0	458,163.6	483,405.7	5,124,438.7
Cost (\$ x 1000)	\$ 10,616.3	\$ 9,563.0	\$ 10,486.4	\$ 8,518.3	\$ 6,548.7	\$ 6,222.0	\$ 10,289.5	\$ 10,499.0	\$ 9,590.9	\$ 10,028.2	\$ 10,808.8	\$ 10,617.0	\$ 113,060.0
Boardman Energy (MWh)	37,482.0	33,352.4	38,268.5	16,631.6	-	22,270.6	38,051.5	38,717.4	36,484.5	36,264.7	36,095.0	38,821.3	372,439.4
Cost (\$ x 1000)	\$ 668.8	\$ 596.4	\$ 680.9	\$ 300.6	\$ -	\$ 414.5	\$ 677.6	\$ 687.8	\$ 650.5	\$ 650.2	\$ 644.5	\$ 689.3	\$ 6,661.1
Valmy Energy (MWh)	156,088.4	134,726.9	64,953.3	12,087.4	-	-	126,348.8	151,940.5	141,928.6	149,119.8	151,164.3	167,723.1	1,256,081.0
Cost (\$ x 1000)	\$ 5,255.1	\$ 4,547.8	\$ 2,227.0	\$ 422.1	\$ -	\$ -	\$ 4,287.2	\$ 5,123.3	\$ 4,795.9	\$ 5,033.6	\$ 5,088.9	\$ 5,624.8	\$ 42,405.7
Danskin Energy (MWh)	-	-	-	-	-	-	3,285.4	5,574.6	665.9	-	-	-	9,525.8
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 171.7	\$ 299.0	\$ 35.3	\$ -	\$ -	\$ -	\$ 506.0
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 622.3	\$ 749.8	\$ 472.5	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,567.3
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	69.6	508.7	-	-	-	-	578.3
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3.7	\$ 27.7	\$ -	\$ -	\$ -	\$ -	\$ 31.3
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3.7	\$ 27.7	\$ -	\$ -	\$ -	\$ -	\$ 31.3
Purchased Power (Excluding CSPP)	27,170.0	99.7	2,129.2	6,652.9	26,432.0	153,898.5	337,143.3	236,183.9	130,959.9	4,433.7	11,290.2	66,067.4	1,002,460.7
Market Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	60,911.8	29,659.0	30,503.7	36,832.4	55,724.1	216,187.8	399,576.1	298,389.8	156,293.5	34,903.9	45,235.7	105,152.8	1,469,370.4
Market Cost (\$ x 1000)	\$ 1,016.5	\$ 2.7	\$ 72.7	\$ 180.4	\$ 697.5	\$ 4,394.1	\$ 14,468.8	\$ 11,051.6	\$ 5,923.8	\$ 185.2	\$ 472.4	\$ 3,388.9	\$ 41,854.5
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,176.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,466.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,859.4	\$ 1,618.5	\$ 1,215.0	\$ 1,391.5	\$ 1,875.4	\$ 9,049.6	\$ 19,450.3	\$ 16,055.3	\$ 7,310.3	\$ 1,851.3	\$ 2,697.7	\$ 5,948.3	\$ 71,322.7
Surplus Sales Energy (MWh)	30,466.8	138,320.4	110,488.7	119,167.2	61,588.8	14,315.6	38.4	11,539.8	55,938.0	120,910.6	49,472.9	11,687.2	723,934.4
Revenue Including Transmission Costs (\$ x 1000)	\$ 1,223.8	\$ 5,400.0	\$ 3,720.7	\$ 3,855.9	\$ 1,889.5	\$ 424.0	\$ 1.1	\$ 351.8	\$ 1,812.7	\$ 4,867.4	\$ 2,167.7	\$ 566.1	\$ 26,279.6
Transmission Costs (\$ x 1000)	\$ (30.5)	\$ 138.3	\$ 110.5	\$ 119.2	\$ 61.6	\$ 14.3	\$ 0.0	\$ 11.5	\$ 55.9	\$ 120.9	\$ 49.5	\$ 11.7	\$ 723.9
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 1,193.4	\$ 5,261.6	\$ 3,610.2	\$ 3,736.8	\$ 1,827.0	\$ 409.7	\$ 1.1	\$ 340.2	\$ 1,756.8	\$ 4,746.5	\$ 2,118.2	\$ 554.4	\$ 25,555.7
Net Power Supply Expenses (\$ x 1000)	\$ 18,552.1	\$ 11,378.6	\$ 11,398.2	\$ 7,331.9	\$ 7,047.5	\$ 15,713.0	\$ 35,329.5	\$ 32,802.6	\$ 21,063.2	\$ 13,268.0	\$ 16,831.2	\$ 22,776.5	\$ 213,492.3

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2004

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,248.9	445,920.5	732,638.5	643,084.9	718,697.6	576,933.5	542,765.8	462,530.3	442,510.2	416,569.1	397,319.6	467,244.5	6,366,443.3
Bridger Energy (MWh)	476,727.1	436,519.2	468,086.1	350,940.4	295,924.3	279,975.7	473,837.8	473,391.1	434,137.3	454,863.4	458,828.1	483,405.1	5,086,635.5
Cost (\$ x 1000)	\$ 10,482.9	\$ 9,587.4	\$ 10,308.5	\$ 7,817.5	\$ 6,625.4	\$ 6,272.1	\$ 10,424.9	\$ 10,416.0	\$ 9,588.6	\$ 10,044.1	\$ 10,084.2	\$ 10,617.0	\$ 112,289.5
Boardman Energy (MWh)	34,532.3	34,765.4	37,762.2	14,853.8	-	23,427.3	38,908.8	38,301.3	36,296.7	36,305.0	36,591.3	39,761.1	371,505.1
Cost (\$ x 1000)	\$ 623.7	\$ 618.1	\$ 673.1	\$ 273.4	\$ -	\$ 435.2	\$ 690.7	\$ 681.4	\$ 647.6	\$ 650.8	\$ 652.1	\$ 703.7	\$ 6,649.8
Valmy Energy (MWh)	150,429.2	138,179.6	33,910.6	-	-	-	133,036.0	150,369.0	142,215.9	148,476.8	151,969.7	168,304.8	1,216,891.6
Cost (\$ x 1000)	\$ 5,075.4	\$ 4,657.5	\$ 1,167.4	\$ -	\$ -	\$ -	\$ 4,512.3	\$ 5,073.4	\$ 4,804.9	\$ 5,013.2	\$ 5,114.5	\$ 5,643.3	\$ 41,061.9
Danskin Energy (MWh)	-	-	-	-	-	-	4,918.7	5,088.6	735.4	-	-	-	10,742.7
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 257.5	\$ 273.4	\$ 39.1	\$ -	\$ -	\$ -	\$ 570.0
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 708.2	\$ 724.2	\$ 476.2	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,631.3
Bennett Mountain Energy (MWh)	-	-	-	-	-	-	143.7	312.2	-	-	-	-	455.9
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7.6	\$ 17.0	\$ -	\$ -	\$ -	\$ -	\$ 24.6
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7.6	\$ 17.0	\$ -	\$ -	\$ -	\$ -	\$ 24.6
Purchased Power (Excluding CSPP)	46,778.5	13,399.5	573.5	12,985.5	108,238.5	304,433.6	335,440.2	263,558.3	131,385.0	7,210.3	11,337.9	73,576.7	1,308,917.5
Market Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Contract Energy (MWh)	80,520.2	42,958.8	28,948.0	43,165.1	137,530.6	366,722.9	397,872.9	325,764.1	156,718.5	37,680.5	45,283.5	112,662.1	1,775,827.2
Market Cost (\$ x 1000)	\$ 1,557.9	\$ 566.8	\$ 15.8	\$ 347.9	\$ 3,375.1	\$ 9,168.9	\$ 14,792.8	\$ 12,088.7	\$ 5,922.5	\$ 306.0	\$ 494.3	\$ 3,846.9	\$ 52,483.7
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,861.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,252.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 3,400.7	\$ 2,182.7	\$ 1,158.1	\$ 1,559.0	\$ 4,553.0	\$ 13,824.4	\$ 19,774.4	\$ 17,092.4	\$ 7,309.0	\$ 1,972.1	\$ 2,719.5	\$ 6,406.4	\$ 81,951.8
Surplus Sales Energy (MWh)	14,183.2	45,492.6	273,064.6	125,813.4	19,713.6	237.1	50.9	10,528.4	55,422.4	102,879.1	47,819.9	10,580.7	705,785.9
Revenue Including Transmission Costs (\$ x 1000)	\$ 554.9	\$ 1,746.1	\$ 8,955.9	\$ 4,030.4	\$ 491.8	\$ 7.3	\$ 1.5	\$ 317.7	\$ 1,790.6	\$ 4,106.7	\$ 2,102.1	\$ 505.3	\$ 24,610.4
Transmission Costs (\$ x 1000)	\$ 14.2	\$ 45.5	\$ 273.1	\$ 125.8	\$ 19.7	\$ 0.2	\$ 0.1	\$ 10.5	\$ 55.4	\$ 102.9	\$ 47.8	\$ 10.6	\$ 705.8
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 540.8	\$ 1,700.6	\$ 8,682.8	\$ 3,904.5	\$ 472.1	\$ 7.1	\$ 1.5	\$ 307.2	\$ 1,735.2	\$ 4,003.8	\$ 2,054.3	\$ 494.7	\$ 23,904.6
Net Power Supply Expenses (\$ x 1000)	\$ 19,387.7	\$ 15,659.5	\$ 5,024.4	\$ 6,181.6	\$ 11,156.7	\$ 20,961.3	\$ 36,116.6	\$ 33,697.1	\$ 21,101.2	\$ 14,127.6	\$ 16,963.5	\$ 23,327.2	\$ 223,704.5









IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2008

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,338.0	553,844.4	624,168.9	631,243.9	947,389.9	867,363.7	647,441.9	530,674.3	446,026.7	501,236.5	409,422.9	471,868.0	7,151,019.1
Energy (MWh)	432,372.9	375,205.0	329,980.9	313,493.9	248,345.4	216,621.4	419,850.6	445,794.9	398,422.1	430,947.6	429,666.0	482,923.2	4,523,023.9
Cost (\$ x 1000)	\$ 9,592.7	\$ 8,356.8	\$ 7,385.2	\$ 6,988.8	\$ 5,565.3	\$ 4,877.0	\$ 9,338.6	\$ 9,862.1	\$ 8,867.0	\$ 9,552.0	\$ 9,508.9	\$ 10,607.3	\$ 100,501.6
Boardman													
Energy (MWh)	29,848.4	26,730.6	28,079.6	14,820.8	-	20,501.4	37,897.6	37,650.5	33,697.0	33,699.4	31,230.0	36,855.8	331,011.2
Cost (\$ x 1000)	\$ 551.9	\$ 495.0	\$ 524.8	\$ 272.9	\$ -	\$ 383.8	\$ 675.2	\$ 671.4	\$ 607.8	\$ 610.9	\$ 570.0	\$ 659.2	\$ 6,023.0
Valmy													
Energy (MWh)	82,818.0	49,743.3	3,651.4	-	-	-	96,779.1	124,830.8	92,239.0	138,162.1	138,863.7	161,311.8	888,429.1
Cost (\$ x 1000)	\$ 2,842.5	\$ 1,707.0	\$ 132.1	\$ -	\$ -	\$ -	\$ 3,305.4	\$ 4,242.7	\$ 3,154.5	\$ 4,677.9	\$ 4,699.2	\$ 5,421.0	\$ 30,162.6
Danskin													
Energy (MWh)	-	-	-	-	-	-	232.3	2,530.1	402.7	-	-	-	3,165.0
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11.1	\$ 123.7	\$ 19.5	\$ -	\$ -	\$ -	\$ 154.2
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 461.7	\$ 574.5	\$ 456.6	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,215.5
Bennett Mountain													
Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)													
Market Energy (MWh)	154,723.5	58,287.5	86,475.4	33,314.4	18,767.7	111,845.8	326,831.7	245,676.0	176,586.1	9,582.1	37,955.7	77,414.1	1,337,460.0
Contract Energy (MWh)	33,741.7	29,599.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,065.4	466,909.7
Total Energy Excl. CSPP (MWh)	188,465.3	87,886.7	114,849.9	63,493.9	48,059.8	174,135.1	389,264.4	307,881.9	201,919.6	40,052.3	71,901.3	116,479.5	1,804,369.7
Market Cost (\$ x 1000)	\$ 4,612.7	\$ 1,511.2	\$ 2,447.7	\$ 940.3	\$ 506.3	\$ 2,724.2	\$ 11,964.1	\$ 9,807.3	\$ 6,881.3	\$ 261.6	\$ 1,112.4	\$ 3,524.5	\$ 46,093.7
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 6,455.6	\$ 3,127.1	\$ 3,590.1	\$ 2,151.4	\$ 1,684.3	\$ 7,379.6	\$ 16,945.6	\$ 14,811.1	\$ 8,067.8	\$ 1,927.7	\$ 3,337.7	\$ 6,084.0	\$ 75,561.9
Surplus Sales													
Energy (MWh)	5,561.6	40,502.5	72,446.7	96,850.9	111,353.6	31,788.7	20.9	4,131.0	15,508.7	152,476.5	38,931.1	8,658.0	578,230.2
Revenue Including Transmission Costs (\$ x 1000)	\$ 217.0	\$ 1,507.1	\$ 2,213.5	\$ 2,889.9	\$ 3,034.9	\$ 875.6	\$ 0.6	\$ 113.5	\$ 483.2	\$ 5,926.3	\$ 1,588.8	\$ 391.2	\$ 19,241.6
Transmission Costs (\$ x 1000)	\$ 5.6	\$ 40.5	\$ 72.4	\$ 96.9	\$ 111.4	\$ 31.8	\$ 0.0	\$ 4.1	\$ 15.5	\$ 152.5	\$ 38.9	\$ 8.7	\$ 578.2
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 211.4	\$ 1,466.6	\$ 2,141.0	\$ 2,793.0	\$ 2,923.5	\$ 843.8	\$ 0.6	\$ 109.4	\$ 467.7	\$ 5,773.9	\$ 1,549.9	\$ 382.6	\$ 18,663.4
Net Power Supply Expenses (\$ x 1000)	\$ 19,577.1	\$ 12,533.8	\$ 9,890.3	\$ 7,056.3	\$ 4,776.4	\$ 12,233.2	\$ 30,726.0	\$ 30,052.4	\$ 20,686.0	\$ 11,445.9	\$ 17,003.3	\$ 22,840.5	\$ 198,821.3

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2009

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	520,347.7	590,869.7	602,904.2	980,187.4	1,107,702.1	1,134,423.2	962,544.6	550,918.0	526,615.6	548,127.1	434,481.4	577,900.2	8,537,021.2
Energy (MWh)	435,860.9	395,509.2	346,225.1	246,647.5	204,272.9	124,528.1	387,959.6	433,956.0	403,106.0	438,913.8	456,560.7	483,170.0	4,356,701.8
Cost (\$ x 1000)	\$ 9,662.5	\$ 8,764.3	\$ 7,725.9	\$ 5,517.4	\$ 4,592.1	\$ 2,829.4	\$ 8,671.8	\$ 9,624.5	\$ 8,946.3	\$ 9,709.2	\$ 10,048.7	\$ 10,612.2	\$ 96,694.4
Boardman													
Energy (MWh)	30,087.1	29,154.2	32,941.6	14,784.6	-	18,237.0	36,985.1	37,686.6	36,450.9	36,936.0	36,652.3	39,315.3	349,230.7
Cost (\$ x 1000)	\$ 555.6	\$ 532.1	\$ 599.3	\$ 272.3	\$ -	\$ 344.3	\$ 661.2	\$ 672.0	\$ 650.0	\$ 660.5	\$ 653.1	\$ 696.9	\$ 6,297.2
Valmy													
Energy (MWh)	37,628.3	32,366.6	1,720.2	-	-	-	49,735.2	117,423.1	74,594.6	142,777.4	147,613.8	165,111.7	768,970.8
Cost (\$ x 1000)	\$ 1,294.2	\$ 1,117.9	\$ 62.2	\$ -	\$ -	\$ -	\$ 1,704.1	\$ 3,992.8	\$ 2,550.4	\$ 4,828.9	\$ 4,976.2	\$ 5,941.7	\$ 26,068.2
Danskin													
Energy (MWh)	-	-	-	-	-	-	-	2,537.1	-	160.1	-	-	2,697.2
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 118.9	\$ -	\$ 7.6	\$ -	\$ -	\$ 126.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 569.7	\$ 437.1	\$ 458.8	\$ 437.5	\$ 451.5	\$ 5,187.8
Bennett Mountain													
Energy (MWh)	-	-	-	-	-	-	-	-	-	-	-	-	-
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Purchased Power (Excluding CSPP)													
Market Energy (MWh)	191,307.8	30,738.4	82,139.6	1,176.5	6,684.7	22,670.3	112,427.2	244,651.6	127,660.5	5,349.3	3,804.7	16,280.5	844,891.1
Contract Energy (MWh)	33,741.7	29,559.2	28,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPP (MWh)	225,049.5	60,297.6	110,514.1	31,356.0	35,976.9	84,959.5	174,859.9	306,857.4	152,994.0	35,819.5	37,750.3	55,365.9	1,311,800.8
Market Cost (\$ x 1000)	\$ 5,812.1	\$ 825.1	\$ 2,528.1	\$ 36.8	\$ 192.2	\$ 540.2	\$ 3,867.0	\$ 9,215.9	\$ 4,819.8	\$ 174.9	\$ 134.6	\$ 651.1	\$ 28,797.7
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 7,655.0	\$ 2,441.0	\$ 3,670.4	\$ 1,247.9	\$ 1,370.1	\$ 5,195.6	\$ 8,848.5	\$ 14,219.7	\$ 6,206.3	\$ 1,841.0	\$ 2,359.8	\$ 3,210.5	\$ 58,265.8
Surplus Sales													
Energy (MWh)	684.8	55,336.9	66,037.1	346,761.3	215,511.7	115,292.9	20,627.6	4,150.0	36,571.6	211,725.8	70,892.9	60,069.6	1,203,662.2
Revenue including Transmission Costs (\$ x 1000)	\$ 25.9	\$ 1,924.8	\$ 2,018.1	\$ 9,103.3	\$ 5,631.7	\$ 2,690.1	\$ 620.6	\$ 114.9	\$ 1,072.7	\$ 8,083.0	\$ 2,836.0	\$ 2,760.8	\$ 36,862.0
Transmission Costs (\$ x 1000)	\$ 0.7	\$ 55.3	\$ 66.0	\$ 346.8	\$ 215.5	\$ 115.3	\$ 20.6	\$ 4.2	\$ 36.6	\$ 211.7	\$ 70.9	\$ 60.1	\$ 1,203.7
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 25.3	\$ 1,869.5	\$ 1,952.0	\$ 8,756.6	\$ 5,416.2	\$ 2,574.8	\$ 600.0	\$ 110.8	\$ 1,036.1	\$ 7,871.3	\$ 2,765.1	\$ 2,700.8	\$ 35,678.3
Net Power Supply Expenses (\$ x 1000)	\$ 19,487.8	\$ 11,300.2	\$ 10,504.9	\$ (1,282.6)	\$ 986.4	\$ 6,231.2	\$ 19,736.2	\$ 28,967.9	\$ 17,754.0	\$ 9,627.0	\$ 15,710.1	\$ 17,812.1	\$ 156,835.2

IPCO POWER SUPPLY COSTS FOR 2011 NORMALIZED LOADS OVER 83 WATER YEAR CONDITIONS

2010

	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Hydroelectric Generation (MWh)	667,711.5	716,661.3	655,111.0	557,583.9	839,515.2	1,082,186.4	676,286.3	494,278.4	520,865.5	525,205.1	413,155.7	540,011.2	7,688,571.5
Energy (MWh)	476,136.6	430,960.1	430,662.8	304,225.4	286,665.3	233,321.2	448,482.0	472,322.9	414,013.0	444,435.7	455,840.1	483,204.5	4,880,289.6
Cost (\$ x 1000)	\$ 10,471.1	\$ 9,475.8	\$ 9,543.6	\$ 6,804.9	\$ 6,417.8	\$ 5,250.6	\$ 9,916.2	\$ 10,394.5	\$ 9,179.9	\$ 9,834.8	\$ 10,034.2	\$ 10,612.9	\$ 107,936.5
Boardman													
Energy (MWh)	35,274.2	33,007.7	33,437.8	13,263.6	-	20,942.8	39,298.3	38,762.7	36,205.0	35,819.9	36,605.8	39,742.0	362,359.8
Cost (\$ x 1000)	\$ 635.0	\$ 591.1	\$ 606.9	\$ 249.0	\$ -	\$ 390.8	\$ 696.7	\$ 688.5	\$ 646.2	\$ 643.4	\$ 652.4	\$ 703.4	\$ 6,503.4
Valmy													
Energy (MWh)	113,951.1	106,037.7	811.7	-	-	-	113,439.2	143,522.9	102,392.4	143,628.2	149,060.1	167,758.5	1,040,601.8
Cost (\$ x 1000)	\$ 3,892.0	\$ 3,615.8	\$ 29.4	\$ -	\$ -	\$ -	\$ 3,868.2	\$ 4,847.7	\$ 3,494.4	\$ 4,855.6	\$ 5,022.2	\$ 5,625.9	\$ 35,251.1
Danskin													
Energy (MWh)	-	-	-	-	-	-	1,362.0	5,217.3	19.8	-	-	-	6,599.1
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 66.6	\$ 261.9	\$ 1.0	\$ -	\$ -	\$ -	\$ 329.5
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 450.7	\$ 450.8	\$ 437.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,061.3
Total Cost	\$ 345.8	\$ 314.5	\$ 399.1	\$ 436.3	\$ 450.3	\$ 436.6	\$ 517.3	\$ 712.7	\$ 438.1	\$ 451.2	\$ 437.5	\$ 451.5	\$ 5,390.8
Bennett Mountain													
Energy (MWh)	-	-	-	-	-	-	193.9	295.6	-	-	-	-	489.5
Cost (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9.6	\$ 15.0	\$ -	\$ -	\$ -	\$ -	\$ 24.7
Fixed Capacity Charge - Gas Transportation (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cost	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9.6	\$ 15.0	\$ -	\$ -	\$ -	\$ -	\$ 24.7
Purchased Power (Excluding CSPP)													
Market Energy (MWh)	12,696.9	10.7	12,919.2	73,799.7	52,505.1	21,712.5	262,262.7	240,049.5	113,010.4	2,311.3	8,918.4	30,118.1	820,314.5
Contract Energy (MWh)	33,741.7	29,559.2	26,374.5	30,179.5	29,292.1	62,289.3	62,432.8	62,205.9	25,333.5	30,470.2	33,945.6	39,085.4	466,909.7
Total Energy Excl. CSPP (MWh)	46,438.6	29,570.0	41,293.7	103,979.2	81,797.3	84,001.7	314,695.5	302,255.3	138,343.9	32,781.5	42,864.0	69,203.5	1,287,224.2
Market Cost (\$ x 1000)	\$ 372.7	\$ 0.3	\$ 351.3	\$ 2,045.0	\$ 1,618.7	\$ 538.0	\$ 10,124.5	\$ 10,368.7	\$ 4,534.5	\$ 64.5	\$ 342.2	\$ 1,335.7	\$ 31,696.1
Contract Cost (\$ x 1000)	\$ 1,842.9	\$ 1,615.9	\$ 1,142.4	\$ 1,211.1	\$ 1,178.0	\$ 4,655.5	\$ 4,981.5	\$ 5,003.7	\$ 1,386.5	\$ 1,666.1	\$ 2,225.2	\$ 2,559.5	\$ 29,468.2
Total Cost Excl. CSPP (\$ x 1000)	\$ 2,215.5	\$ 1,616.2	\$ 1,493.7	\$ 3,256.1	\$ 2,796.6	\$ 5,193.4	\$ 15,106.0	\$ 15,372.4	\$ 5,921.0	\$ 1,730.6	\$ 2,567.4	\$ 3,895.2	\$ 61,164.2
Surplus Sales													
Energy (MWh)	91,241.2	263,377.5	133,034.8	52,841.9	75,564.4	173,609.1	2,330.1	11,430.1	54,643.4	190,856.2	55,357.7	39,124.6	1,143,411.0
Revenue Including Transmission Costs (\$ x 1000)	\$ 3,524.6	\$ 9,514.6	\$ 4,095.5	\$ 1,570.4	\$ 2,033.6	\$ 3,904.4	\$ 64.9	\$ 336.8	\$ 1,716.7	\$ 7,629.6	\$ 2,349.1	\$ 1,965.0	\$ 38,705.2
Transmission Costs (\$ x 1000)	\$ 91.2	\$ 263.4	\$ 133.0	\$ 52.8	\$ 75.6	\$ 2.3	\$ 11.4	\$ 54.6	\$ 190.9	\$ 55.4	\$ 39.1	\$ 39.1	\$ 1,143.4
Revenue Excluding Transmission Costs (\$ x 1000)	\$ 3,433.4	\$ 9,251.3	\$ 3,962.5	\$ 1,517.6	\$ 1,958.0	\$ 3,730.8	\$ 62.6	\$ 325.4	\$ 1,662.1	\$ 7,438.8	\$ 2,283.7	\$ 1,925.9	\$ 37,561.8
Net Power Supply Expenses (\$ x 1000)	\$ 14,126.0	\$ 6,362.1	\$ 8,110.2	\$ 9,228.7	\$ 7,706.7	\$ 7,540.7	\$ 30,051.4	\$ 31,705.5	\$ 18,017.7	\$ 10,076.8	\$ 16,419.9	\$ 19,363.1	\$ 178,708.8

Idaho Power/702  
Witness: Scott Wright

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Scott Wright  
2011 October Update

July 29, 2011



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**TIMOTHY E. TATUM**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Timothy E. Tatum and my business address is 1221 West Idaho Street,  
3 Boise, Idaho.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company ("Idaho Power" or "Company") as the  
6 Senior Manager of Cost of Service in the Regulatory Affairs Department.

7 **Q. Please describe your educational background.**

8 A. I have earned a Bachelor of Business Administration degree in Economics and  
9 Master of Business Administration degree from Boise State University. I have also  
10 attended electric utility ratemaking courses, including "Practical Skills for The  
11 Changing Electrical Industry," a course offered through New Mexico State  
12 University's Center for Public Utilities, "Introduction to Rate Design and Cost of  
13 Service Concepts and Techniques" presented by Electric Utilities Consultants, Inc.,  
14 and Edison Electric Institute's "Electric Rates Advanced Course."

15 **Q. Please describe your work experience with Idaho Power.**

16 A. I began my employment with Idaho Power in 1996 as a Customer Service  
17 Representative in the Company's Customer Service Center where I handled  
18 customer phone calls and other customer-related transactions. In 1999, I began  
19 working in the Customer Account Management Center where I was responsible for  
20 customer account maintenance in the area of billing and metering.

21 In June of 2003, after seven years in customer service, I began working as an  
22 Economic Analyst on the Energy Efficiency Team. As an Economic Analyst, I was  
23 responsible for ensuring that the Demand-Side Management ("DSM") expenditures  
24 were accounted for properly, preparing and reporting DSM program costs and  
25 activities to management and various external stakeholders, conducting cost-benefit  
26



1 analyses of DSM programs, and providing DSM analysis support for the Company's  
2 2004 Integrated Resource Plan ("IRP").

3 In August of 2004, I accepted a position as a Regulatory Analyst in  
4 Regulatory Affairs. As a Regulatory Analyst, I provided support for the Company's  
5 various regulatory activities, including tariff administration, regulatory ratemaking and  
6 compliance filings, and the development of various pricing strategies and policies.

7 In August of 2006, I was promoted to Senior Regulatory Analyst. As a Senior  
8 Regulatory Analyst, my responsibilities expanded to include the development of  
9 complex financial studies to determine revenue recovery and pricing strategies,  
10 including the preparation of the Company's cost-of-service studies.

11 In September of 2008, I was promoted to Manager of Cost of Service and in  
12 April of 2011, I was promoted to Senior Manager of Cost of Service. As Senior  
13 Manager of Cost of Service, I oversee the Company's cost-of-service activities such  
14 as power supply modeling, jurisdictional separation studies, class cost-of-service  
15 studies, and marginal cost studies.

16 **I. OVERVIEW**

17 **Q. What is the purpose of your testimony in this proceeding?**

18 A. The purpose of my testimony is to present the forecast methodologies that were  
19 applied to the Company's 2010 financial data to arrive at the 2011 forecasted  
20 financial levels. Further, my testimony will describe the instructions that I provided to  
21 Mr. Scott Wright, Mr. Matthew T. Larkin, and Ms. Kelley Noe with regard to the  
22 normalizing, annualizing, and other regulatory adjustments required to arrive at the  
23 2011 test year revenue requirement.

24 **Q. Did you consult with Mr. Gregory W. Said, Vice President of Regulatory Affairs,**  
25 **regarding the development of the 2011 Test Year ("2011 Test Year" or "Test**  
26 **Year")?**

1 A. Yes. The 2011 Test Year development methodology presented in the remainder of  
2 my testimony is a direct result of numerous discussions with Mr. Said.

3 **Q. Did Mr. Said provide you with any specific instructions or guidance regarding**  
4 **the development of the Test Year presented in this proceeding?**

5 A. Yes. Mr. Said instructed me to develop the 2011 Test Year based upon 2010 actual  
6 financial data in a manner similar to that approved by the Oregon Public Utility  
7 Commission ("Commission") in the Company's last general rate case, UE 213 ("2009  
8 Rate Case"). However, Mr. Said instructed me to depart from the methodology used  
9 in the 2009 Rate Case in a number of specific areas. First, Mr. Said instructed me to  
10 hold operations and maintenance ("O&M") expenses to 2010 levels with the  
11 exception of specific cost categories that are "known" to be materially different in  
12 2011. Second, Mr. Said instructed me to hold normalized total power supply  
13 expenses to the currently approved (UE 222, Order No. 11-178) normalized levels  
14 determined under the October Update component of the 2011 Annual Power Cost  
15 Update ("APCU"). Mr. Said's instructions to depart from the methodology used in the  
16 2009 Rate Case have the effect of reducing the Company's revenue requirement  
17 request in this case.

18 **Q. Will you briefly summarize how the Company has developed its 2011 Test**  
19 **Year?**

20 A. Yes. The development of the 2011 Test Year began with 2010 actual financial data  
21 ("2010 Actuals"). 2010 Actuals were adjusted by Mr. Douglas N. Jones to reflect  
22 traditional ratemaking adjustments and to arrive at 2010 adjusted actual financial  
23 information ("2010 Base"). The 2010 Base was then adjusted to reach 2011  
24 forecasted financial levels ("2011 Unadjusted Test Year"). Finally, annualizing  
25 adjustments were made to the 2011 Unadjusted Test Year to reach the Company's  
26 2011 Test Year.

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**II. DEVELOPMENT OF THE 2011 UNADJUSTED TEST YEAR**

**Q. Please describe the forecast methodologies used to adjust the 2010 Base to the 2011 Unadjusted Test Year.**

A. There were two primary methods developed and applied to the 2010 Base Year to forecast the 2011 Unadjusted Test Year. First, the Company used the unchanged 2010 Base level financial data when the Company believed that certain amounts would continue to remain at 2010 levels or if account balances were very small. Alternatively, "Other Adjustments" were applied based upon known or probable factors for 2011 that relate to a particular account. Examples of these factors include, but are not limited to, new billing and volume contract terms, discontinued services, anticipated levels of economic activity, and applicable regulatory commission orders.

**Q. How does the forecast methodology used in this case differ from that applied in the 2009 Rate Case?**

A. Aside from the specific adjustments requested by Mr. Said mentioned earlier in my testimony, the major difference between the forecasting methodology used in this case and that applied in the 2009 Rate Case is the utilization of growth rates to escalate O&M expenses. In the 2009 Rate Case, the Company applied Compound Annual Growth Rates ("CAGRs") to adjust a number of O&M expense accounts. Based on historical data, CAGRs represented a steady level of positive or negative growth from the beginning period to the ending period. To develop the 2011 Test Year, the Company has not applied any escalation factors to forecast O&M expenses. Instead the Company has made a conscious choice to hold test year O&M expenses to 2010 Base levels with adjustments only to specific cost categories that are "known" to be materially different in 2011.

1 **Q. Have you prepared exhibits that list all accounts and identify the specific**  
2 **method you used to forecast the 2011 Unadjusted Test Year?**

3 A. Yes. I directed the preparation of Exhibit 801 to present a summarized list of all  
4 accounts to which the two previously discussed methods were applied. Each of the  
5 methodologies is described in more detail within the Forecast Methodology Manual,  
6 Exhibit 802, which was also prepared at my direction. To develop the Forecast  
7 Methodology Manual, the Company performed a review of each group of accounts  
8 included within the test year. Based upon specific knowledge and analysis of that  
9 account grouping, the Company either used 2010 Actuals or applied an Other  
10 Adjustment methodology to that account to represent an appropriate level of  
11 anticipated spending.

12 **Q. Have the data and the associated adjustments made to your exhibits and**  
13 **supporting schedules been calculated on a total system basis?**

14 A. Yes. Ms. Noe will address the determination of the Oregon jurisdictional test year  
15 values in her testimony.

16 **Q. Please identify the major areas or groupings of financial accounts addressed**  
17 **by the methodologies included in the Forecast Methodology Manual (Exhibit**  
18 **802).**

19 A. The major areas or groupings of financial accounts addressed in Exhibit 802 include  
20 Other Operating Revenues (Accounts 451, 454, and 456), Operation and  
21 Maintenance Expenses (Accounts 500 through 900), Depreciation and Amortization  
22 Expense (Accounts 403 and 404), and Electric Plant in Service ("EPIS") (Account  
23 101). A detailed discussion of the individual accounts and methods used is provided  
24 in Exhibit 802.

25 **Q. Please provide an overview of the methodology used to forecast 2011 Other**  
26 **Operating Revenues (Accounts 447, 451, 454, and 456).**

1 A. Consistent with Mr. Said's directive, Surplus Sales Revenues (Account 447) were  
2 held to the currently approved 2011 normalized levels. The remaining Other  
3 Operating Revenues (Accounts 451, 454, and 456) were forecasted to be the same  
4 as 2010 actual revenue with the exception of four revenue categories: 1)  
5 cogeneration and small power production revenues, 2) facilities charge revenues, 3)  
6 network services and other long term firm and point-to-point transmission revenues,  
7 and 4) Sierra Pacific Power Company sales.

8 Cogeneration and small power production revenues were determined by  
9 adjusting the 2010 revenues to account for 13 new wind projects that have or will  
10 come on-line in 2011. Facilities charge revenues were determined by adjusting the  
11 2010 actual revenues to account for a reduced facilities charge rate as proposed by  
12 Mr. Scott D. Sparks in his testimony in this case. Network services and other long-  
13 term firm and point-to-point transmission revenues were projected based upon  
14 information more reflective of current circumstances and an anticipated Open Access  
15 Transmission Tariff rate update in October 2011. Finally, Sierra Pacific Power usage  
16 revenues were adjusted to zero to recognize that no usage revenues from Sierra  
17 Pacific Power are expected in 2011.

18 A detailed discussion of the methods applied to determine Other Operating  
19 Revenues for the 2011 Unadjusted Test Year is provided on pages 8-10 of Exhibit  
20 802.

21 **Q. Please provide an overview of the methodology used to forecast 2011**  
22 **Operation and Maintenance Expenses (Accounts 500 through 900).**

23 A. Based upon the instructions I received from Mr. Said, the power supply expense  
24 accounts were held to the currently approved 2011 normalized levels. The power  
25 supply expense accounts include Fuel Expense (Accounts 501 and 547) and  
26

1 Purchased Power Expense (Account 555 - excluding purchased power for  
2 transmission losses).

3 The remaining O&M adjustments were also made in accordance with Mr.  
4 Said's instructions. The Oregon Energy Efficiency Rider Expense (Account 908) was  
5 removed in its entirety from the 2011 Test Year. Incentive Expense (Account 920)  
6 was forecasted for 2011 to include only the normalized incentive components that  
7 are attributable to Customer Satisfaction and Reliability, consistent with the method  
8 filed in the 2009 Rate Case. Incentive expense represents the "at-risk" portion of  
9 employees' total compensation package. Pension Expense (Account 926) for the  
10 Oregon jurisdiction was determined by the Company's actuary, Milliman, Inc., and  
11 represents an estimate of the total 2011 net periodic pension expense under SFAS  
12 87. Regulatory Commission Expenses (Account 928) were adjusted to include  
13 known changes in amortizations for recovery of Commission-ordered intervenor  
14 funding. The remaining O&M expense amounts were segregated into labor and non-  
15 labor expense groupings to determine the respective 2011 forecast amounts.

16 **Q. Did the Company utilize the Oregon Commission Staff's ("Staff") preferred**  
17 **three-year wage and salary analysis to determine the 2011 Test Year O&M**  
18 **labor expense? If not, please explain why it was not used.**

19 A. No. In prior general rate case proceedings the Staff has indicated its preference for  
20 a three-year wage and salary analysis to determine test year O&M labor expense.  
21 The Staff's wage and salary analysis utilizes the Consumer Price Index ("CPI") as a  
22 basis to escalate wages from a base year, typically three years prior to the requested  
23 test period in a rate case. Further, it is the Company's understanding that the Staff's  
24 analysis is intended to be applied to non-union positions or positions that are not  
25 subject to contract-driven wage adjustments.

26

1           The Company does not believe the Staff's wage and salary analysis is  
2 appropriately applied to Idaho Power for a number of reasons. First, the Company  
3 does not believe that CPI is representative of the primary factors that drive wage  
4 increases. Further, CPI does not recognize that employees' wages are driven by  
5 factors other than inflation. Wage levels are also impacted as employees move  
6 through the salary structure for reasons such as promotions and/or merit salary  
7 increases. Second, the Staff's wage analysis arbitrarily selects a base year upon  
8 which to apply the CPI factors. Even if the escalation factors applied under this  
9 approach were reflective of the true factors that drive wages, which CPI is not,  
10 applying them to a base year that is not representative of a normal operating year  
11 could yield unreasonable results. Third, the Staff's wage analysis does not  
12 recognize that although Idaho Power is a non-union shop, the Company endeavors  
13 to maintain wages at market competitive levels for job classifications in which it  
14 competes with other union companies in the region for employees.

15 **Q. Please provide an overview of the methodology used to forecast 2011 O&M**  
16 **labor expense.**

17 A. The 2011 labor expense was forecasted by applying historical monthly labor cost  
18 relationships to the first two calendar months of 2011 actual labor costs. More  
19 specifically, the 2011 O&M labor forecast was developed by first calculating the  
20 three-year historical average of February year-to-date actual O&M labor costs as a  
21 percentage of the total year actual O&M labor costs. The resulting percentage was  
22 determined to be 15.00 percent. This percentage was then applied to the actual  
23 February 2011 year-to-date O&M labor to estimate the total 2011 O&M labor costs.  
24 The February amount was first reduced by pension expense and by the Smart Grid  
25 related O&M labor, which has a credit offset in a non-labor cost element. The  
26 resulting 2011 labor projection of \$133.9 million was then allocated to the applicable

1 Federal Energy Regulatory Commission (“FERC”) accounts based on 2010 actual  
2 labor charges to those same accounts. A more detailed discussion of the labor-  
3 related O&M adjustment is provided in Exhibit 802, pages 10 and 11.

4 **Q. Please provide an overview of the forecast methodology used to forecast 2011**  
5 **non-labor O&M expenses.**

6 A. The 2011 non-labor O&M expenses, excluding the accounts mentioned above, were  
7 projected to be equal to the 2010 actual expense level with adjustments only for  
8 significant known changes. At my direction, the O&M expenses were reviewed by  
9 subject matter experts to identify and adjust those areas, based on specific  
10 knowledge, where expense levels are expected to be materially different than those  
11 included in the 2010 Base. The review identified significant specific increases or  
12 decreases to the 2010 non-labor actual levels in the following categories:

- 13 • Thermal O&M Increases Identified by Operating Partners
- 14 • Bennett Mountain - Combustor Inspection
- 15 • Commission-Ordered Amortizations
- 16 • Smart Grid Investment Grant Credit in 2010 - Not Recurring
- 17 • Light Data and Ranging Surveys to meet North American Electric  
18 Reliability Corporation Requirements
- 19 • Bureau of Land Management Rate Increase - Land Rents
- 20 • Idaho Fish and Game’s Projected Hatchery Expense Increases
- 21 • Increased IT Maintenance Expenses
- 22 • Specific Reliability Projects - Transmission

23 Actual 2010 non-labor O&M, excluding the items identified previously, equaled  
24 \$142.3 million. Following the adjustments for significant known changes, non-labor  
25 O&M is projected to increase by \$15.6 million to \$157.9 million. A more detailed  
26



1 discussion of the non-labor O&M adjustments is provided in Exhibit 802, pages 11-  
2 15.

3 **Q. Please provide an overview of the methodology to forecast 2011 Depreciation**  
4 **and Amortization Expense (Accounts 403 and 404).**

5 A. The 2011 depreciation expense, amortization expense, and related reserve accounts  
6 were calculated based on the monthly estimated 2011 plant balances. Depreciation  
7 rates authorized by Commission Order No. 09-317 (Docket No. UM 1395) were used  
8 for the entire 2011 Test Year. The determination of the Depreciation and  
9 Amortization Expense adjustments is detailed in Exhibit 802, pages 22-23.

10 **Q. Please provide an overview of the methodology to forecast 2011 Electric Plant**  
11 **in Service (Account 101).**

12 A. Electric Plant in Service is a function of multiple components, including actual year-  
13 end 2010 EPIS and Construction Work in Progress ("CWIP") balances, estimated  
14 2011 spending, expected 2011 closings of CWIP, and estimated retirements.  
15 Therefore, it was necessary to use a number of methodologies to develop the 2011  
16 Unadjusted Test Year EPIS balances, which are detailed in Exhibit 802, pages 27-  
17 28.

18 To project 2011 construction expenditures and 2011 closings of CWIP to  
19 EPIS, at Mr. Said's instruction, the Company first bifurcated into two separate and  
20 distinct parts, those projects in excess of \$2 million and those under \$2 million.

21 Projects in excess of \$2 million were reviewed by the individual project  
22 managers, who estimated the costs to complete and the in-service date of each  
23 project. The investment in projects under \$2 million (excluding vehicles) closing to  
24 EPIS as a group, was forecasted to be comparable to actual 2010 closings to EPIS  
25 when determining the 2011 Unadjusted Test Year. This method is based upon an  
26

1 assumption that construction activities in 2011 are not anticipated to exceed, but  
2 rather keep pace with, 2010 levels.

3 **III. ANNUALIZING & OTHER ADJUSTMENTS**  
4 **TO ARRIVE AT THE 2011 TEST YEAR**

5 **Q. In Mr. Jones's testimony, he describes the various adjustments that were**  
6 **made to 2010 Actuals to arrive at the 2011 Base Year. Do these same**  
7 **adjustments need to be made in 2011?**

8 A. No. These adjustments are standard ratemaking adjustments based on prior  
9 Commission orders and are adjustments to charges included in the 2010 Actuals.  
10 By removing them from 2010 Actuals prior to applying the various methodologies to  
11 arrive at the Company's proposed 2011 Unadjusted Test Year, the same  
12 adjustments are already accounted for.

13 **Q. What were your instructions to Mr. Wright with regard to the Company's**  
14 **determination of the Test Year normalized net power supply expenses?**

15 A. As mentioned earlier in my testimony, Mr. Said directed me to hold the power supply  
16 expense accounts to the currently approved 2011 normalized levels (Order No. 11-  
17 178). However, I instructed Mr. Wright to update the Company's normalized net  
18 power supply expenses for the 2011 test year for informational purposes. Based on  
19 Mr. Wright's analysis, the updated 2011 test year net power supply expenses,  
20 including PURPA, would be \$267.5 million, an increase of \$20.0 million over the  
21 currently approved 2011 net power supply expenses, including PURPA, of \$247.5  
22 million. Even though Mr. Wright's analysis would suggest a need to increase the  
23 level of net power supply expense recovery through base rates, the Company  
24 believes that this matter is appropriately addressed in the context of the annual  
25 October Update component of the APCU. Mr. Wright provides a detailed discussion  
26 of his analysis in his direct testimony.

1 **Q. What were your instructions to Mr. Larkin with regard to the determination of**  
2 **the Test Year retail sales revenues (Account 442)?**

3 A. I instructed Mr. Larkin to determine the 2011 Test Year retail sales revenues using  
4 the same methodology used in the 2009 Rate Case. That is, my instructions were to  
5 develop the Test Year retail sales revenues based upon forecasted billing  
6 determinants under normal weather and precipitation assumptions. As Mr. Larkin  
7 will cover in greater detail in his testimony, the 2011 Test Year billing determinants  
8 were developed based upon the Company's energy sales and customer count  
9 forecasts prepared for the 2011 IRP. To derive the demand-related billing  
10 determinants, historical demand-to-energy relationships were applied to the energy  
11 sales forecast. The forecasted billing determinants were then applied to the rates in  
12 effect at the time of the filing to determine the 2011 Test Year retail sales revenues.

13 **Q. Are there any additional adjustments that need to be made to properly reflect**  
14 **the 2011 Test Year?**

15 A. Yes. It is necessary for the Company to make additional annualizing and known and  
16 measureable adjustments.

17 **Q. Please describe the additional annualizing adjustments made under your**  
18 **direction to the 2011 Test Year.**

19 A. I instructed Ms. Noe to make annualizing adjustments to certain expense and rate  
20 base items to reflect them as though they have been in existence for the entire Test  
21 Year; that is, at year-end 2011 levels. These include operating payroll, 2012 salary  
22 structure adjustment, depreciation expense and reserve, and plant placed in service  
23 during 2011 in excess of \$2 million with the associated estimated property taxes and  
24 insurance premiums. Such adjustments are appropriate to reflect conditions that will  
25 be in effect at the time rates are placed in effect. Ms. Noe provides additional detail  
26 regarding the annualizing adjustments in her testimony.

1 **Q. Did you have any additional instructions for Ms. Noe?**

2 A. Yes. Consistent with Mr. Said's directive, I instructed Ms. Noe to use the  
3 Commission-approved 2011 normalized power supply expenses in the Oregon  
4 jurisdictional revenue requirement determination.

5 **Q. Has an exhibit been prepared that details each of the adjustments that were  
6 made to move from the 2010 Actuals to the 2011 Test Year?**

7 A. Yes. Ms. Noe's Exhibit 904 summarizes the adjustments that were made to each  
8 FERC Account to: 1) move from the 2010 Actuals to the 2010 Base, 2) move from  
9 the 2010 Base to the 2011 Unadjusted Test Year, and 3) move from the 2011  
10 Unadjusted Test Year to the 2011 Test Year.

11 **Q. According to Ms. Noe's analysis using the 2011 Test Year financial  
12 information, what is the Company's revenue requirement on a system-wide  
13 and Oregon jurisdictional basis?**

14 A. Using the 2011 Test Year financial information, Ms. Noe has calculated the  
15 Company's revenue requirement to be \$981.6 million on a system-wide basis and  
16 \$45.7 million on an Oregon jurisdictional basis. Ms. Noe calculated the Company's  
17 annual revenue deficiency, the amount that the Test Year revenue requirement  
18 exceeds the Test Year retail sales revenue, to be \$105.6 million on a system-wide  
19 basis, and \$5.8 million on an Oregon jurisdictional basis. An increase to annual  
20 Oregon jurisdictional revenues in the amount of \$5.8 million would result in an overall  
21 average increase to customer rates of 14.7 percent.

22 **Q. Is it appropriate for the Commission to determine the Company's Oregon  
23 jurisdictional revenue requirement to be \$45.7 million, its revenue deficiency to  
24 be \$5.8 million, and therefore, approve an overall 14.7 percent increase to  
25 customer rates?**

26

1 A. Yes. The \$45.7 million figure is a reasonable determination of the Company's  
2 annual Oregon jurisdictional revenue requirement. The \$5.8 million quantification of  
3 revenue deficiency is also reasonable. It is in the best interest of the Company and  
4 its customers for the Commission to approve a rate increase to provide a 14.7  
5 percent increase to the Company's Oregon jurisdictional revenues.

6 **Q. Does this conclude your direct testimony in this case?**

7 A. Yes.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Timothy E. Tatum  
Forecast Methodology Summary

July 29, 2011

IDAHO POWER COMPANY  
Methodology Summary  
2011 Oregon Test Year

- 2010 Base
- Other Methodology
- Normalized
- Removed in its Entirety

LINE NO	Description	(1) FERC ACCOUNT NUMBER	(2) Methodology
<b>Cost of Service Components</b>			
<b>Other Operating Revenues</b>			
1	Miscellaneous Service Revenues	451	2010 Base
	Rent from Electric Property		
2	Substation equipment	454	2010 Base
3	Transformer & distribution rentals	454	2010 Base
4	Station and line rentals	454	2010 Base
5	Cogeneration and small power production	454	Other Methodology
6	Real estate rents	454	2010 Base
7	Dark fiber rents	454	2010 Base
8	Joint pole attachments	454	2010 Base
9	Facilities charges	454	Other Methodology
10	Overnight park rents	454	2010 Base
<b>Other Electric Revenues</b>			
11	Net Work Service and Other Long Term Firm	456	Other Methodology
12	Point-to-Point	456	Other Methodology
13	Photovoltaic	456	2010 Base
14	Antelope	456	2010 Base
15	Sierra Pacific Power Company sales	456	Removed in its entirety
16	Stand-by service	456	2010 Base
17	Energy Efficiency Rider	456	2010 Base
18	Miscellaneous	456	2010 Base
<b>Other Revenues and Expenses</b>			
<b>Other Revenues</b>			
19	Power Solutions	415	2010 Base
20	Hydro Services	415	2010 Base
21	Water Management Services	415	2010 Base
22	QRE Reporting	415	2010 Base
23	Joint Use (Pole) - Idaho	415	2010 Base
24	Joint Use (Pole) - Oregon	415	2010 Base
<b>Other Expenses</b>			
25	Power Solutions	416	2010 Base
26	Hydro Services	416	2010 Base
27	Water Management Services	416	2010 Base
28	QRE Reporting	416	2010 Base
29	Joint Use (Pole) - Idaho	416	2010 Base
30	Joint Use (Pole) - Oregon	416	2010 Base

IDAHO POWER COMPANY  
Methodology Summary  
2011 Oregon Test Year

- 2010 Base
- Other Methodology
- Normalized
- Removed in its Entirety

LINE NO	Description	(1) FERC ACCOUNT NUMBER	(2) Methodology
<b>Operations and Maintenance Expenses</b>			
31	Power production expenses		
32	Steam power generation(excluding account 501)	500-514	Other Methodology
33	Fuel expense	501	Normalized
34	Hydraulic power generation	535-545	Other Methodology
35	Other power generation(excluding 547.1)	546-554	Other Methodology
36	Fuel expense	547	Normalized
37	Other power supply expenses		
38	Purchased power (excluding 555.050)	555	Normalized
39	Transmission losses	555.050	Other Methodology
40	System control and load dispatch	556	Other Methodology
41	Other expenses	557.050	Other Methodology
42	Other expenses - PCA, EPC and PCAM (excluding 557.050)	557	Removed in its entirety
43	Transmission expenses	560-573	Other Methodology
44	Distribution expenses	580-598	Other Methodology
45	Customer account, service and information expenses	901-912	Other Methodology
46	Administrative & general expenses(excluding accts 908.1 and 930.1)	920-935	Other Methodology
47	Energy Efficiency Rider expenses	908.1	Removed in its entirety
48	General advertising expenses	930.1	Removed in its entirety
<b>Depreciation and Amortization Expense</b>			
49	Depreciation	403	Other Methodology
50	Amortization	404	Other Methodology
<b>Electric Plant/Regulatory Assets - Amort, Adj, Gains &amp; Losses</b>			
51	Amortization of electric plant acquisition adjustment-Prairie Power	406	Other Methodology
52	Regulatory Debits and Credits	407.3	Other Methodology
<b>Taxes Other Than Income</b>			
53	Real and personal property	408.1	Other Methodology
54	Kilowatt-hour tax - Idaho	408.1	Normalized
55	Licenses		
56	Wyoming	408.1	Other Methodology
57	Shoshone-Bannock	408.1	Other Methodology
58	Regulatory commission		
59	Idaho	408.1	2010 Base
60	Oregon	408.1	Other Methodology
61	Franchise tax - Oregon	408.1	Other Methodology
62	Idaho Energy Resources Statement of Income	418.1/419	Other Methodology



IDAHO POWER COMPANY  
Methodology Summary  
2011 Oregon Test Year

- 2010 Base
- Other Methodology
- Normalized
- Removed in its Entirety

LINE NO	Description	(1) FERC ACCOUNT NUMBER	(2) Methodology
<b>Rate Base Components</b>			
<b>Electric Plant-In-Service</b>			
59	Projects > \$2 million	101	Other Methodology
60	Projects < \$2 million	101	2010 Base
<b>Accumulated Reserve for Depreciation and Amortization</b>			
61	Depreciation reserve	108	Other Methodology
62	Amortization reserve	111	Other Methodology
<b>Materials and Supplies</b>			
63	Plant materials and operating supplies	154	Other Methodology
64	Stores expense undistributed	163	Other Methodology
65	<b>Deferred Conservation Programs</b>	182.3	Other Methodology
66	<b>Other Deferred Programs</b>	182.3/186.722/186.770	Other Methodology
67	<b>Deferred Income Taxes</b>	190/282/283	Other Methodology
68	<b>Customer Advances For Construction</b>	252	Other Methodology
69	<b>IERCO-Subsidiary Rate Base Components</b>	123.1/186/145	Other Methodology

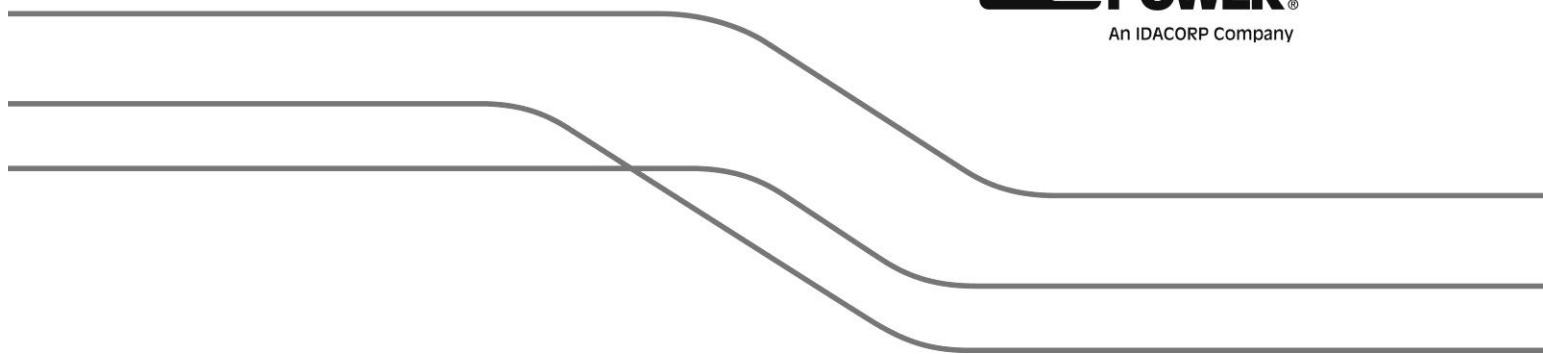
BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Timothy E. Tatum  
Forecast Methodology Manual

July 29, 2011



## Forecast Methodology Manual

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## INTRODUCTION

This Forecast Methodology Manual (“Manual”) was developed solely to provide supporting information for the methodologies that Idaho Power Company (“IPC”) used to set the values contained in its proposed 2011 test year in the 2011 general rate case filing before the Oregon Public Utility Commission (“OPUC”). The financial forecasts, estimates, and other information contained herein were developed solely for ratemaking purposes. This Manual should not be relied upon by current or prospective investors or securities market professionals for any purpose.

The values described in this Manual were provided to IPC witness Noe for appropriate application to the Uniform System of Accounts for determination of revenue requirement in the 2011 test year. The manual is organized in three sections and includes:

- **Forecast Methods.** Forecast Methods includes a description of the forecast methodologies used to develop the 2011 unadjusted test year from the 2010 actual financial data.
- **Cost of Service Components.** Cost of Service Components includes a description of the three digit account number specified in the Uniform System of Accounts adopted by the Commission and the FERC and the forecast method for each major account or account group.
- **Rate Base Components.** Rate Base Components includes a description of the three digit account number specified in the Uniform System of Accounts adopted by the Commission and the FERC and the forecast method applied for each major account or account group.



## FORECAST METHODS

Updates to the 2010 actual financial data to IPC's proposed 2011 unadjusted test year were developed using one of the following two forecast methods:

- (1) **2010 Base.** 2010 actual financial data was used when the IPC believed that certain amounts would continue to remain at 2010 levels or if account balances were very small.
- (2) **Other Adjustments.** Other Adjustments are based on known or probable factors for 2011 that relate to a particular account. Examples of these factors include but are not limited to new billing and volume contract terms, discontinued services, anticipated levels of economic activity, and existing regulatory commission orders.

## COST OF SERVICE COMPONENTS

### Forecast Adjustment A—Other Operating Revenues

Table 4—FERC Accounts 451–456

#### **Description**

Account 451 includes revenues for all miscellaneous services and charges billed to customers that are not specifically provided for in other accounts. This includes fees for changing, connecting, or disconnecting services and profit on maintenance or installations on customers' premises. Miscellaneous service revenues include continuous service reversion charges (Idaho only), field visit charges, return trip charges, returned check fees, service connection charges, service establishment charges, and application and processing fees collected for new permits, new leases, or requests for easement relinquishments. Account 454 includes rents received for the use by others of land, buildings, and other property devoted to electric operations by IPC such as joint pole attachments, facilities charges, and line and substation rents. Account 456 includes revenues derived from electric operations not includable in other revenue accounts. For example, compensation for minor services provided for others, such as engineering and revenues from transmission of electricity of others over transmission facilities of IPC, such as network and point-to-point wheeling.

#### **Forecast Methodology**

Forecast Adjustment A increases Other Operating Revenue (Accounts 451–456) by \$1,577,758 above the 2010 Base. Accounts 451 through 456 used a combination of the methods for projecting 2011 amounts as described below.

**Account 451—Miscellaneous Service Revenues.** These revenues were projected for 2011 to be the same as the 12 months actual ended December 2010 Base. This method was used because revenues in this category are not expected to either decrease or increase materially beyond the 2010 level.

**Account 454—Rent from Electric Property.** Rents from Electric Property were projected based on either the twelve months actual ended December 2010 balance or the Other Adjustment methodology.

Substation equipment rentals, transformer and distribution rentals, station and line rentals, real estate rents, dark fiber rents, joint pole attachments, overnight park rents were forecasted to be the same as the 2010 Base, as this was the most reasonable expectation for these revenues.

Cogeneration and small power production revenues and facilities charge revenues were determined by using the Other Adjustment methodology. The 2010 Base was increased for thirteen new wind projects that have or will come on-line in 2011. For 2011, cogeneration and small power production revenues were calculated by taking the number of identified wind projects times the historical average annual revenue per wind project and then increased by an annual historical growth rate of 4.5%. All existing cogeneration and small power production

revenues (Schedule 72 only) were also increased by 4.5% for annual historical growth. This resulted in a forecast adjustment for \$197,439 for cogeneration and small power production revenues. For facilities charge revenues, IPC reviews the rate for these charges intermittently. During a recent review, IPC determined that the rate should be decreased based on the current methodology. For 2011, the new annual rate will decrease the revenues generated from the facilities charges by \$1,214,026.

**Account 456—Other Electric Revenues.** Other Electric Revenues were projected based using either the carry-forward of the 2010 Base or the Other Adjustment methodology based on known factors of the individual type of 2011 revenues to be projected as described below:

Revenues related to the photovoltaic station service, Antelope substation, Sierra stand-by service, and miscellaneous were projected for 2011 to be the same as the 2010 Base, as this was the most reasonable expectation for these revenues.

The 2011 Network Transmission Customer revenues were calculated based on nine months of the network transmission customers' average load ratio share times the formula-based FERC transmission revenue requirement in effect from October 1, 2010, through September 30, 2011, and three months of the network transmission customers' average load ratio share times the forecasted FERC transmission revenue requirement. The timing for the Transmission Revenue Requirement is the same as the point-to-point wheeling rate described below. The 2011 estimated network customer MW demand used to calculate the Network Transmission Customer revenue was calculated by taking 2009 MW demand and escalating it using the .7% annual growth factor assumed in the 2009 IRP for 2010. The escalated 2010 MW demand was then increased by 2 MW for new network customer MW demand in 2011

The 2011 point-to-point ("PTP") wheeling revenues were forecasted based on the Other Adjustment methodology and were calculated based on nine months of the 2011 equivalent KWhs times the formula based FERC transmission rate, effective October 1, 2010, through September 30, 2011, and three months of the 2011 equivalent KWhs times the forecasted transmission rate. The three-quarters and one-quarter year revenue calculation split uses the known current transmission rate is in effect through September 30, 2011, and forecasting a rate that would be in effect October 1, 2011 for the final three months. The 2011 equivalent KWhs are based on an average of 2009 and 2010 equivalent KWhs.

Sierra Pacific Power Usage revenues were forecasted based on the Other Adjustment methodology. For 2011, Valmy usage is not expected to exceed capacity; therefore no revenues from Sierra Pacific Power Usage are expected.

## Forecast Adjustment B & C—Other Revenues and Other Expenses

Tables 4&5—FERC Accounts 415–416 (excluding 415.002 and 416.002)

### *Description*

Accounts 415 through 416 respectively, include all revenues derived from the sale of merchandise and jobbing or contract work and all expenses incurred in such activities. For IPC, jobbing and contract work revenues and expenses include activities related to Idaho Power Solutions, water management services, and joint pole use.

### *Forecast Methodology*

Forecast Adjustments B and C for Other Revenues (Account 415) and Other Expenses (Account 416), respectively are both \$0, therefore the 2011 forecast remains the same as the 2010 Base.

Actual account 415 and account 416 results have not seen significant growth or decline over the last two years. Revenues and expenses in these accounts are typically close to equal and offsetting. Therefore, any fluctuations in these accounts from year to year have little or no impact on the revenue requirement.

## Forecast Adjustment D—Operations and Maintenance Expenses (“O&M”)

Table 5—FERC Accounts 500–935

### *Overview*

Forecast Adjustment D increases Operations and Maintenance Expenses (“O&M”) (Accounts 500–935) by \$41,282,700 above the 2010 Base. Excluded from Adjustment D is any increase in normalized accounts 501—Fuel, 547—Fuel, 555—Purchased Power.

In developing the 2011 forecast, IPC split O&M historical actuals into two elements (Labor and Non-Labor) and forecasted each element separately and then allocated each separately to the individual FERC accounts. Excluded from this process were accounts 555.050 (Purchased Power Transmission Losses), 565.000 (Transmission of Electricity by Others), 908.131, 908.132 (Idaho and Oregon Energy Efficiency Riders), 920.001 (Incentive), 926.203, 926.204, and 926.205 (Pension Expense), and 928.203 and 928.303 (Regulatory Commission Expenses), as these were handled separately

### *Labor*

IPC calculated the projected 2011 O&M labor by first calculating the average three-year historical February year-to-date actual O&M labor costs as a percentage of the total year actual O&M labor costs which was determined to be 15.00%. This percentage was then applied to the

actual February 2011 year-to-date O&M labor of \$20,083,335 to estimate the total 2011 O&M labor costs of \$133,886,252 (the February amount was first reduced by pension expense accounts 926.203, 204 and 205), and by the Smart Grid related O&M labor (cost centers 305 and 888) which has a credit offset in a non-labor cost element. The 2011 labor projection was then allocated to FERC account based on 2010 actual labor charges to those same accounts.

The table below details the 2011 estimated labor amount:

<b>2011 Labor Expenses</b>	<b>Total</b>
February Y-T-D O&M Labor Excluding Incentive & Pension	\$20,083,335
Divided by the Historical February Y-T-D as a Percentage of Total Year Labor	15.00%
2011 O&M Labor Expense Excluding Incentive and Pension	<u>\$133,886,252</u>

### ***Non-Labor***

IPC calculated the projected 2011 non-labor O&M expenses by holding to 2010 non-payroll actual expenses with adjustments for significant known changes. IPC reviewed the O&M expenses to identify and adjust those areas, based on specific knowledge, where expected expense levels are expected to be materially different than those included in the 2010 actuals.

The table below identifies significant specific increases or decreases to the 2010 non-labor actual:

<b>2011 O&amp;M Non-Labor Expenses</b>	<b>Total</b>	<b>Allocated</b>	<b>Direct Assignment</b>
2010 O&M Non-Labor Actuals	\$142,271,408	\$0	\$142,271,408
2011 Identified Significant Known Adjustments			
Thermal O&M Increases from Operating Partners	6,708,356	—	6,708,356
Bennett Mountain—2011 Combustor Inspection	1,257,722	—	1,257,722
Commission Ordered Amortizations	(1,466,130)	—	(1,466,130)
Smart Grid Investment Grant (“SGIG”) Credit in 2010 Not Recurring	4,437,427	4,437,427	—
NERC Required LIDAR Surveys	1,414,000	—	1,414,000
BLM Rate Increase—Land Rents	841,224	—	841,224
Idaho Fish and Game’s Projected Hatchery Increases	731,856	—	731,856
Increased IT Maintenance Expenses	723,200	—	723,200
Special Reliability Projects—Transmission	950,000	—	950,000
Inflation and Growth Related Increases	—	—	—
Subtotal 2011 Identified Significant Known Adjustments	15,597,655	4,437,427	11,160,228
<b>Total 2011 O&amp;M Non-Payroll Expenses</b>	<b>\$157,869,063</b>	<b>\$4,437,427</b>	<b>\$153,431,636</b>

The following adjustment to the 2010 Base included in the table above have been allocated to FERC account balances rather than directly assigned:

- **SGIG credit in 2010 not recurring**—O&M work relating to Smart Grid in 2010 was reduced by federal government reimbursements. The positions previously occupied by those involved with SGIG were largely left unfilled when those individuals began working on the Smart Grid project. In the latter part of 2010 and in 2011, those unoccupied positions will or have been filled so the reduction to overall O&M that was generated by the 2010 credit will not reoccur in 2011.

The following adjustments to the 2010 Base included in the table above have been directly assigned to one or more FERC accounts:

- **Power Supply Thermal (Excluding Fuel)**—2010 actual thermal plant O&M was increased by \$6,708,356 due to the following:
  - *Valmy Power Plant*—Non-fuel O&M expenses at the Valmy Plant for 2011 is expected to increase by approximately 11% over 2010 levels. The increases are due to rising chemical costs and usage; higher property insurance, legal, and environmental costs; and higher general administrative overheads. These increases are partially offset by lower maintenance costs associated with the major unit outage. Major maintenance is done on each of the two Valmy units every three years. Unit 2 was overhauled in 2010, while unit 1 will be overhauled in 2011. Unit 2 has a scrubber and therefore incurs the majority of the chemical costs at the plant. Chemical expenses were lower in 2010 because this unit was offline for major maintenance for nine weeks. To offset this increase for 2011, overall maintenance expenses in 2011 are expected to be down as the duration of the major unit overhaul on Unit 1 will be shorter and the scope of repair work is expected to be less than Unit 2. Administrative and general overheads are expected to be higher in 2011 due to an increase in plant O&M expenses and retroactive credits recorded in 2010 that will not re-occur in 2011. IPC negotiates an administrative and general (“A&G”) rate for Valmy that is applied to actual plant O&M expenses. Periodically Valmy A&G expenses that get allocated to IPC by use of this rate are “trued-up” to actual costs. NV Energy issued IPC credits in 2010 because actual 2009 and a portion of actual 2010 A&G expenses were less than what was charged out through the A&G rate. A fixed Valmy A&G rate was negotiated in 2010 that will carry through mid-year 2012. No prior period true-up credits or charges are expected to occur in 2011.
  - *Bridger Power Plant*—O&M labor costs in 2011 at the Jim Bridger Plant are expected to increase 12.5% compared to 2010 levels. The increase is attributed to PacifiCorp’s wage escalation and enhanced 401K benefits per Union Contract Local 127 that was renegotiated in 2010. In addition, a reduction in capital spending at the Jim Bridger plant is expected to result in additional labor dollars being allocated to O&M as compared to 2010.

O&M expenses attributed to materials are expected to increase 9.4%, compared to 2010 levels. The increase is primarily due to chemicals used to treat mine water being

diverted to the plant for use in the cooling towers, as well as additional materials planning to be consumed or installed as part of the maintenance overhaul on Unit #3.

O&M expenses attributed to outside services are expected to increase 22.4%, compared to 2010 levels. A reduction in capital spending at the Jim Bridger plant is expected to result in additional services being allocated to O&M that could not be charged to capital as done in 2010. Examples include boiler scaffolding expenses of approximately \$1 million that was charged to the low NO<sub>x</sub> burner capital project in 2010, but will be classified as O&M this year and turbine bearing work related to the 2010 turbine upgrade project.

Neither the impairment cost incurred in 2010 related to the delay and likely cancelation of the turbine upgrade projects nor the reduction from a prior year accrual true-up are expected to recur in 2011.

- *Boardman Power Plant*—Non-fuel O&M expenses at the Boardman plant are expected to increase 24% or \$840,000 from 2010 levels. The increase is attributed to additional additives and chemicals that will result from the installation of Mercury and NO<sub>x</sub> retrofits planned to be in-service by mid-2011, as well as an increase in overall plant maintenance. The pollution control retrofits at Boardman in 2011 are being installed to comply with the Oregon Utility Mercury Rule to reduce mercury emissions, and comply with federal regional haze (RH BART) rules for NO<sub>x</sub> reductions.

The Boardman plant experienced an outstanding year in 2010, with a forced outage factor (sum of all hours experienced during forced outages divided by number of hours the unit was in an active state) of 2.4% compared to an 2009 forced outage rate of 5.4%. This was due to fewer forced outages, specifically tube leaks, as compared to recent years. This, combined with fewer problems and issues being discovered during the major maintenance outage, caused 2010 overall maintenance expenses to be less than what the plant has experienced in recent years. The increase in plant maintenance expenses expected in 2011 is primarily the result of using historical trending to build the forecast, rather than simply relying on the 2010 result.

While the increases above were directly assigned to the overall Power Supply Thermal (Excluding Fuel) accounts, these increases were then allocated to FERC accounts 500–515 (excluding 501) based on 2010 actuals amounts in those same accounts.

- **Bennett Mountain Combustor Inspection**—Account 554 was increased by \$1,257,722 above 2010 Base due to a scheduled periodic combustor inspection and combustor parts refurbishment at the Bennett Mountain Power Plant. An inspection was not performed in 2010.
- **Commission Ordered Amortizations**—The following amortizations resulted in a decrease to the 2010 Base by \$1,466,130.

Account 908 was reduced by \$1,621,331 due to the non-recurring DSM/Conservation (Idaho Public Utilities Commission (“IPUC”) Order No. 27660) amortization that was completed in June 2010.

Account 928 was increased \$155,201 due to 2011 having three fewer months of the credit amortization of the FERC OFA refund (IPUC Order No. 30722 and 30791). This amortization is completed in August 2011.

- **NERC Required LIDAR Surveys**—Account 563 was increased by \$1,414,000 due to the need to perform LIDAR Surveys (Light Detection and Ranging) to verify transmission line rating values and methodology in order to satisfy the NERC Alert issued in October 2010.
- **BLM Rate Increase for Land Rents**—Accounts 567, 589, 931 and 935 increased \$841,224 over the 2010 Base rents due to new Federal rent schedules and Zone schedule changes. These rents are for IPC lines and facilities that are located on BLM lands. Five FERC accounts were increased based on 2010 actuals as follows—account 935 was increased by \$4,070; account 921 was increased by \$128,026; account 931 was increased \$12,173; account 589 was increased \$135,786; and account 567 was increased by \$561,169.
- **Idaho Fish & Game’s Projected Hatchery Increases**—Account 537 was increased above 2010 Base by \$731,856 due to a projected increase from Idaho Department of Fish & Game (IDFG) for hatchery operations. The increase is related to a number of factors including expanded harvest monitoring/hatchery performance evaluation, increased personnel, O&M and overhead costs, development of a fish identification system, and a contribution toward a region-wide hatchery data base.
- **Increased IT Maintenance Expenses**—Account 921 was increased by \$723,200 due to software and hardware maintenance increases. SGIG projects hardware and software maintenance (after the product’s first year) is not reimbursed by the government. This amount is incremental since IPC will still be operating on the legacy mainframe systems until the new hardware and software is fully tested and promoted into production. The expected in-service date is the second quarter of 2013 for the new applications. At that time, IPC will be archiving data from the legacy systems and beginning the process to discontinue maintenance on these legacy systems. IPC has also included an incremental amount for storage and monitoring tools due to an increase in data storage required on an annual basis and the increase in new open systems that require monitoring tools.
- **Special Reliability Projects**—Transmission, account 563, was increased by \$950,000 for transmission projects that are above the normal level of transmission maintenance that was performed in 2010. The projects will repair or replace guy wires on the Bridger to Goshen Transmission Line, and replace dead-ends on the Oxbow to Palette Junction Transmission Line.



Once O&M labor and non-labor increase or decrease amounts were determined for each FERC account, the results were combined to reflect the total forecast adjustment.

### ***FERC Account Development***

Since IPC does not forecast by individual FERC accounts the following two methods (Direct Assignment and Allocation) were used to assign both labor and non-labor to the appropriate FERC accounts.

**Direct Assignment Method**—The forecast adjustments listed in the direct assignment column in the non-labor expenses above are charges that would occur in specific accounts and therefore were directly assigned to those accounts listed below.

- Account 500–515—Thermal Plant O&M
- Account 537—Idaho Fish & Game’s Projected Hatchery Increases
- Account 554—Bennett Mountain Combustor Inspection
- Account 563—NERC Required LIDAR Surveys; Transmission Reliability Projects
- Account 567—a portion of the BLM Rate Increase
- Account 589—a portion of the BLM Rate Increase
- Account 908—Non-recurring DSM Amortization
- Account 921—IT Maintenance Expenses; a portion of the BLM Rate Increase
- Account 928—Non-recurring Amortization of FERC OFA Refund
- Account 931—a portion of the BLM Rate Increase
- Account 935—a portion of the BLM Rate Increase

**Allocation Method**—This method was used to allocate the forecast amounts when the identification of specific accounts was impossible or when the impact would be to all accounts. The O&M labor forecast was allocated to individual FERC accounts based on the percentage of 2010 actual O&M labor charges incurred within each account to total O&M labor charges incurred in 2010. The O&M non-labor forecast (not directly assigned) was allocated based on 2010 actual non-labor charges included in each FERC account to total O&M non-labor charges incurred in 2010.

## ***Exceptions to the Described O&M Methodology Above***

**FERC Accounts 555.050, 565.000, 908.131, 908.132, 920.001, 926.203, 926.204, 926.205, 928.202, 928.203, and 928.303**

As stated earlier, the following were forecasted separately from the labor and non-labor O&M forecast described above and directly assigned to the FERC accounts they impact:

- **Account 501—Fuel Expense.** The forecast amount included in this account is the same amount used for the October update of the 2010 Annual Power Cost Update (APCU) docket UE 222.
- **Account 547—Fuel Expense (Excluding 547.000—Salmon Diesel).** The forecast amount included in this account is the same amount used for the October update of the 2010 Annual Power Cost Update (APCU) docket UE 222.
- **Account 555—Purchased Power (Excluding 555.050).** The forecast amount included in this account is the same amount used for the October update of the 2010 Annual Power Cost Update (APCU) docket UE 222.
- **Account 555.050—Purchased Power Transmission Losses.** This account is anticipated to increase above the 2010 Base by \$359,462.
- **Account 557—Other Expense (Excluding 557.000).** The amounts in these accounts have been removed in their entirety from the test year.
- **Account 565.000—Transmission of Electricity by Others.** This account is forecasted by combining each individual month's actual expenses for the previous four years and then averaging each month. This average monthly amount is then combined for the twelve months and used as the 2011 forecast.
- **Account 908.131 and 908.132—Idaho and Oregon Energy Efficiency Rider Expenses.** The amounts in these accounts have been removed from the 2010 Base in their entirety per the IPUC Order No. 30189.
- **Account 920.001—Incentive Expense.** The entire actual 2010 incentive expense of \$16,398,839 was removed from the 2010 Base and replaced with the projected 2011 incentive of \$6,680,748 that includes only elements related to Customer Satisfaction and Reliability. This resulted in a net reduction for incentive expense of \$9,718,091.
- **Accounts 926.203, 926.204 and 926.205—Pension Expense.** Pension expense amortization was increased in the Idaho jurisdiction by \$13,993,913, the FERC jurisdiction by \$129,964 and in the Oregon jurisdiction by \$8,788.
- **Accounts 928.203 and 928.303—Regulatory Commission Expense.** Intervenor Funding was estimated to increase \$160,478 by assuming a one-year amortization period, per the following Orders:

- IPUC Order No. 30978—CAPAI for \$4,379.
- IPUC Order Nos. 30722—CAPAI for \$11,464 and IIPA for \$38,472.
- IPUC Order Nos. 30892—CAPAI for \$10,510, ICL for \$9,854 and IIPA for \$20,677.
- OPUC Order No. 11-011—CUB 2011 Funding Grant for \$32,350.
- OPUC Order No. 10-406—CUB 2010 Funding Grant for \$32,772.

The following O&M discussion has been organized by functional account groups. Within each account group, a general description of the accounts has been provided.

## ***Steam Power Generation***

### **FERC Accounts 500–514**

#### **Description**

Accounts 500 through 514 include the labor, materials, and expenses incurred to operate and maintain prime movers, generators, and their auxiliary apparatus, switch gear, and other electric equipment used in steam power generation. Additionally, the labor and expenses incurred in the general supervision and direction of maintenance of steam generation facilities are included in these accounts.

#### **Forecast Methodology**

**Accounts 500–514—Excluding Account 501, Fuel Expense.** The 2011 projection for accounts 500–514 was developed by adjusting the 2010 Base with the identified increases provided to IPC from the operating partners of the Thermal Generating Plants. The identified increases were spread to accounts 500–515 (excluding 501) based on 2010 actual amounts in those same accounts.

**Account 501—Fuel Expense.** The forecast amount included in this account is the same amount used for the October update of the 2010 Annual Power Cost Update (APCU) docket UE 222.

## ***Hydraulic Power Generation***

### **FERC Accounts 535–545**

#### **Description**

Accounts 535 through 545 include the labor, materials used, and expenses incurred to operate and maintain hydraulic works including structures, reservoirs, dams, waterways, generators, roads and bridges, and expenses directly related to the hydroelectric development outside the generating station, including fish and wildlife and recreational facilities. These accounts also include the labor and expenses incurred in the general supervision and direction of maintenance of hydraulic power generating stations, rents of property of others used, occupied, or operated in connection with hydraulic power generation, including amounts payable to the United States for

the occupancy of public lands and reservations for reservoirs, dams, flumes, forebays, penstocks, and power houses.

### **Forecast Methodology**

**Accounts 535–545**—The projection of accounts 535–545 was developed using both methods described under FERC Account Development above. For labor, these accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. For non-labor, these accounts were projected to be equal to the 2010 Base adjusted by the increase in account 537 for Idaho Fish & Game’s projected hatchery increases of \$731,856 and by each account’s allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

### **Other Power Generation**

#### **FERC Accounts 546–557**

##### **Description**

Accounts 546 through 554 include the operation labor, materials used, and expenses incurred in operating and maintaining prime movers, generators, and electric equipment in other power generating stations. Labor and expenses incurred in the general supervision and direction of maintenance of other power generating stations are also included in these accounts. Account 556 includes labor and expenses incurred in load dispatching activities for system control. System control activities include the production and dispatching of electricity. Account 557 includes production expenses incurred directly in connection with the purchase of electricity which is not specifically provided for in other production expense accounts.

##### **Forecast Methodology**

**Accounts 546–557—Excluding Account 547, Fuel Expense; Account 555, Purchased Power; and Account 557, Other Expense.** The projection of accounts 546–557 was developed using both methods described under FERC Account Development above. For labor, these accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. For non-labor, these accounts were projected to be equal to the 2010 Base and adjusted by a \$1,257,722 increase (in account 554) for the 2011 Bennett Mountain Combustor Inspection, and by each account’s allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

##### **Account 547—Fuel Expense and Account 555—Purchased Power (Excluding 555.050).**

The forecast amount included in this account is the same amount used for the October update of the 2010 Annual Power Cost Update (APCU) docket UE 222.

**Account 555.050—Purchases Power Transmission Losses.** This account is projected to increase above the 2010 Base by \$359,462. Purchased Power Transmission losses were developed based upon projected volumes and market prices.

##### **Account 557, Other Expense (Excluding 557.000—Other Power Production Expense).**

These expenses are removed entirely from the test year.

## ***Transmission Expenses***

### **FERC Accounts 560–573**

#### **Description**

Accounts 560 through 573 include the operation labor, materials used, and expenses incurred in the system planning, operation, executing the reliability coordination function, monitoring, assessing, and operating the power system and individual transmission facilities in real-time to maintain safe and reliable operation of the transmission system specified. Additional activities include: processing the hourly, daily, weekly, and monthly transmission service requests using an automated system such as an Open Access Same-Time Information System (“OASIS”); billing to transmission owners for system control and dispatching service; and conducting transmission services studies for proposed transmission interconnections and generation interconnection with the transmission system. These accounts include the labor, materials used, and expenses incurred in the operation of transmission substations, switching stations, and transmission lines. The use of transmission facilities owned by others and rents of property used, occupied, or operated in connection with the transmission system are also part of this account. The accounts also include the labor, materials used, and expenses incurred in the maintenance of structures, computer hardware and software, communication equipment, miscellaneous transmission plant, station equipment, and transmission plant serving the transmission function.

#### **Forecast Methodology**

**Accounts 560–573—Excluding Account 565.000, Transmission of Electricity by Others (3<sup>rd</sup>-Party Transmission).** The projection of accounts 560–573 was developed using both methods described under FERC Account Development above. For labor, these accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. For non-labor, these accounts were projected to be equal to the 2010 Base adjusted by \$1,414,000 increase for the LIDAR Surveys, and \$950,000 increase for Transmission Reliability Projects both to account 563, a \$561,169 increase in account 567 for its portion of the BLM rate increase for land rents, and by each account’s allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

- **Account 565—Transmission of Electricity by Others.** This account was estimated to increase above the 2010 Base by \$2,060,093. For the test year, this account was forecasted by combining each individual month’s actual expenses for the previous four years and then averaging each month. This average monthly amount is then combined for the twelve months and used as the 2011 forecast.

## ***Distribution Expenses***

### **FERC Accounts 580–598**

#### **Description**

Accounts 580 through 598 include labor, materials used, and expenses incurred in the general supervision and direction of the operation of the distribution system such as station operation, overhead and underground line operation, meter department operation of customer meters and

associated equipment, load dispatching operations, work on customer installations, and inspecting premises. Also included in these accounts are the labor, materials used, and expenses incurred in the general supervision and direction of the maintenance of the distribution system, including maintenance of structures, distribution plant, overhead distribution line facilities, underground distribution line facilities, distribution line transformers, meters, and meter testing equipment.

### **Forecast Methodology**

**Accounts 580–598.** The projection of accounts 580–598 was developed using both methods described under FERC Account Development above. For labor, accounts 586 and 597 (operation and maintenance of distribution meters) were held equal to the 2010 Base and assuming that, with the new AMI meter, expenses would not increase in 2011. All other accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. For non-labor, these accounts were projected to be equal to the 2010 Base adjusted by \$135,786 in account 589 for its portion of the BLM rate increase for land rents, and by each account's allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

## ***Customer Accounting and Customer Services and Information Expenses***

### **FERC Accounts 901–905 and 907–912**

#### **Description**

Accounts 901 through 905 include the labor, materials used, and expenses incurred in the general direction and supervision of customer accounting and collecting activities, including reading customer meters, work on customer applications, contracts, orders, credit investigations, billing and accounting, collections, and complaints. These accounts also include the accounting for losses from uncollectible utility revenues. Accounts 907 through 912 include the labor and expenses incurred in customer service and informational activities to encourage safe and efficient use of the utility's service, to encourage conservation of the utility's service, and answer specific inquiries as to proper use of the service and equipment utilizing the service.

#### **Forecast Methodology**

**Accounts 901–905 and 907–912—Excluding Account 908.131 and 908.132, Idaho and Oregon Energy Efficiency Rider.** The projection of accounts 901–905 and 907–912, excluding the Idaho and Oregon Energy Efficiency Rider (energy efficiency expenses), was developed using both methods described under FERC Account Development above. For labor, these accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. Additionally, account 902 was reduced by \$1,973,938 accounting for the savings attributable to AMI. For non-labor, these accounts were projected to be equal to the 2010 Base and by each account's allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

**Account 908.131 and 908.132—Idaho and Oregon Energy Efficiency Rider.** The expenses associated with the Idaho and Oregon Energy Efficiency Riders have been excluded from the 2011 test year in their entirety (IPUC Order No. 30189).

## ***Administration and General Expenses (“A&G”)***

### **FERC Accounts 920–935**

#### **Description**

Accounts 920 through 935 include activities undertaken in connection with the utility’s general and administrative operations that are assignable to specific administrative or general departments and are not specifically provided for in other accounts. A&G accounts include: (1) compensation of officers, executives, and other employees of the utility which are properly chargeable to utility operations but not chargeable directly to a particular operating function, (2) office supplies and expenses, (3) fees and expenses of professional consultants and others for general services which are not applicable to a particular operating function, (4) insurance or reserve accruals to protect the utility against losses and damages to owned or leased property used in its utility operations, (5) payments for employee accident, sickness, hospital, and death benefits or insurance, (6) payments to municipal or other governmental authorities, (7) the cost of materials, supplies, and services furnished to such authorities without reimbursement in compliance with franchise, ordinance, or similar requirements, (8) expenses incurred by the utility in connection with formal cases before regulatory commissions or other regulatory bodies, (9) regulatory fees assessed against the utility, (10) commission expenses, (11) payments made to the United States for the administration of the Federal Power Act, (12) materials used and expenses incurred in advertising and related activities, (13) rents properly includable in operating expenses for the property of others used, occupied, or operated in connection with customer accounts, customer service, and informational sales and general and administrative functions of the utility, and (14) operation and maintenance of transportation equipment and the maintenance of utility property which is not chargeable directly to a particular operating function.

#### **Forecast Methodology**

**Accounts 920–935—Excluding Account 920.001, Incentive Expense, 926.203, 926.204, 926.205, Pension Expense and part of 928.202, 928.203, and 928.303, Regulatory Commission Expenses.** The projection of accounts 920–935, excluding incentive, was developed using both methods described under FERC Account Development above. For labor, these accounts received their allocated portion of the total 2011 labor projection based on actual 2010 labor. For non-labor, these accounts were projected to be equal to the 2010 Base adjusted upward by \$155,201 in non-recurring amortization of the FERC OFA refund in account 928, and by \$128,026, \$12,173 and \$4,070 increase in accounts 921, 931 and 935, respectively for their portion of the BLM rate increase for land rent. These accounts also received each account’s allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

**Account 920.001—Incentive Expense.** In the 2008 Idaho General Rate case order (IPUC Order No. 30722) the Commission directed IPC to only include a normalized incentive that “is directly related to improving service or reducing costs to customers.” IPC therefore, included in its projection only the normalized level of incentive attributable to Customer Satisfaction and Reliability. As a result, for the 2011 test year, IPC removed its entire 2010 actual incentive expense of \$16,398,839 from its 2010 Base and replaced that amount with its projected 2011 normalized incentive of \$6,680,748 that includes only those elements related to Customer Satisfaction and Reliability. This resulted in a net reduction for incentive expense of \$9,718,091.

**Accounts 926.203, 926.204, and 926.205—Pension Expense.** For the Oregon jurisdiction the IPC's actuary (Milliman, Inc.) provided a total 2011 net periodic pension expense estimate (SFAS 87) of \$27,954,213 of which Oregon's allocated portion is \$893,024. This is an \$8,788 increase over the amount included in the 2010 Base.

In the Idaho jurisdiction, per IPUC Order No. 31091, IPC is currently recovering \$5,416,796 of its cash contributions to its defined benefit pension plan over a one-year period that began in June 2010. As a result of this Order, included in the 2010 Base is seven months of amortization expense for \$3,159,800. IPC is including in its forecast the additional five months of amortization for \$2,256,996. In addition, IPC has requested in Case No. IPC-E-11-04 recovery of an additional \$11,736,917 for cash contributions made in 2010 which is also included in the forecast, bringing the total requested recovery amount for the Idaho jurisdictional cash payments to \$17,153,713. Therefore, IPC has included in its forecast adjustment an additional \$13,993,913 in amortization expense for 2011.

Since the FERC jurisdiction follows the Idaho jurisdiction for treatment of its portion of pension expense (cash basis), IPC has included an additional \$129,964 in amortization in its estimate above the existing \$60,986 that is included in the 2010 Base.

**Account 928—Regulatory Commission Expenses.** This account was increased by \$155,201 due to three months fewer amortization periods for the amortization of the reimbursement of FERC OFA (IPUC Order No. 30722) than what was in 2010 actuals. This account was also increased for intervenor funding by \$160,478 that was directed in IPUC Order Nos. 30978, 30722 and 30892 for \$4,379, \$49,936, \$41,041, respectively and OPUC Order Nos. 11-011 and 10-406 for \$32,350 and \$32,772, respectively. IPC has assumed a one year amortization for intervenor funding. Account 928 also received its allocated portion of the \$4,437,427 non-direct adjustment to non-labor O&M.

**Accounts 908.131 and 908.132—Idaho and Oregon Energy Efficiency Rider Expenses.** The amounts in these accounts have been removed from the test year in their entirety per IPUC Order No. 30189.

## Forecast Adjustment E—Depreciation and Amortization Expense

Table 6—FERC Accounts 403 and 404

### *Description*

Account 403 includes depreciation expense for all classes of depreciable electric plant in service except such depreciation expense as is chargeable to clearing accounts or to account 416, Costs and Expenses of Merchandising, Jobbing and Contract Work. Account 404 includes amortization charges applicable to amounts included in the electric plant accounts for limited-term franchises, licenses, patent rights, limited-term interest in land, and expenditures on leased property where the service life of the improvements is terminable by action of the lease. The charges to this account are such as to distribute the book cost of each investment as evenly as may be over the period of its benefit to the utility.



## ***Forecast Methodology***

Forecast Adjustment E increases Depreciation and Amortization Expense (accounts 403 and 404) by \$4,974,317 above the 2010 Base

Depreciation and amortization rates were applied to the monthly estimated plant balances (see the Electric Plant in Service discussion in the Rate Base Components section). The depreciation rates authorized by both OPUC Order No. 09-317 and IPUC Order No. 30639 were used for the entire 2011 test year. Several FERC plant accounts have sub-accounts, for which the individual sub-account data was used to calculate a composite rate and applied at the major account level.

For plant accounts 392, Transportation Equipment; 396, Power Operated Equipment; 312, Boiler Plant Equipment; and 397, Communication Equipment, either all or part of the depreciation expense is recorded to other accounts and not account 403. The account 312, Boiler Plant Equipment, and account 397, Communication Equipment, depreciation amounts were calculated using the actual 312.300 and 397.300 accrual for December 2010.

## **Forecast Adjustment F—Electric Plant/Regulatory Assets—Amortization, Adjustments, Gains and Losses**

Table 6—FERC Accounts 406, 411.6, and 411.7

### ***Description***

Account 406 is debited or credited, as the case may be, with amounts includable in operating expenses, pursuant to approval or order of the Commission, for the purpose of providing for the extinguishment of the amount in account 114, Electric Plant Acquisition Adjustments. Accounts 411.6 and 411.7 includes, as approved by the Commission, amounts relating to gains and losses from the disposition of future use utility plant, including amounts which were previously recorded in and transferred from account 105, Electric Plant Held for Future Use.

### ***Forecast Methodology***

Forecast Adjustment F is \$0, resulting in the Amortization of Electric Plant Acquisition Adjustments (account 406) and Gains and Losses from Disposition of Utility Plant (account 411.6 and 411.7) remaining the same as the 2010 Base.

Account 406 is projected for 2011 to remain the same as the 2010 Base. Included in this account is the amortization of the Prairie Power acquisition adjustment of account 114 over 233 months at \$1,894 per month. The amount in account 114 will be fully amortized in July 2012.

Accounts 411.6 and 411.7 do not have a forecast since there is no plan to sell utility plant in 2011.

## Forecast Adjustment G—Regulatory Debits and Credits

Table 8—FERC Account 407.3

### ***Description***

Account 407.3 is debited, when appropriate, with the amounts credited to account 254, Other Regulatory Liabilities, to record regulatory liabilities imposed on the utility by the ratemaking actions of regulatory agencies. This account is also debited, when appropriate, with the amounts credited to account 182.3, Other Regulatory Assets, concurrent with the recovery of such amounts in rates.

### ***Forecast Methodology***

Forecast Adjustment G increases Regulatory Debits (account 407.3) by \$5,802 above the 2010 Base.

IPC has recorded a regulatory asset in account 182.339 for the “capitalized” portion of the net periodic pension costs since August 2007. This capitalized portion is comprised of the Oregon jurisdictional share of net periodic pension cost for each year multiplied by that year’s capitalization percentage, which is determined based on an analysis of the year’s labor costs to determine the percentage of those costs that were ultimately recorded to construction. The capitalization percentage for 2010 was approximately 30.57 percent, which is the assumed percentage for 2011 and 2012. IPC projects a balance for the Oregon capitalized pension costs of \$1,323,161 by December 31, 2011. As a result of the capitalized balance, IPC has estimated the amortization of this amount in account 407.3 to be \$27,757 for 2011, an increase of \$5,802 over the 2010 Base.

## Forecast Adjustment H—Taxes Other than Income Taxes

Table 7—FERC Account 408.1

### ***Description***

Account 408.1 includes those taxes other than income taxes which relate to utility operating income. This account is maintained so as to allow ready identification of the various classes of taxes relating to utility operation, plant leased to others, and other operating income.

### ***Forecast Methodology***

Forecast Adjustment H increases Taxes Other Than Income (Accounts 408.1) by \$3,454,070 above the 2010 Base.

The 2011 forecast methodology for Taxes Other Than Income Taxes was based on a combination of known adjustments arising from specifics of the particular account activity and a carry forward of the 2010 Base amounts.

## Real and Personal Property Taxes

The Idaho property taxes were \$10.9 million, \$12.6 million, and \$14.9 million in 2008, 2009 and 2010, respectively. The property tax increases can be attributable to the increase in market value determined by the Idaho Tax Commission (a result from an increase in utility plant investment along with an increase in net operating income), an increase in local taxing districts budget requirements and a shift in tax burden (residential home values declining).

The methodology used to project property taxes for the 2011 test year is the same estimation process used for establishing the annual property tax accrual for IPC financial statements. Property taxes are estimated using both an appraisal and levy methodology. For the appraisal methodology, actual appraisal data is used to the extent known and each state's historical appraisal methodologies and trends are used in determining the appraisal amount. For the tax levy methodology, the state's historical levy data and local government budget policy is used to estimate levies.

## Idaho kWh Taxes

Test year 2011 kWh taxes were projected based on normalized hydro conditions and normalized consumption.

## Regulatory Commission Fees

The 2011 Idaho regulatory fee was estimated by using the 2010 actual payment. IPC's intrastate gross revenue and the governor's budget recommendation was within 1% of prior year therefore, it was determined the 2010 Base was an appropriate estimate for 2011. The Oregon regulatory fee consists of two fees, Oregon PUC fee and Oregon Department of Energy fee. For the test year 2011, the Oregon PUC fee was the actual 2011 fee and for the Oregon Department of Energy fee, the 2011 estimate was based upon prior year's tax rate multiplied times the current year revenue.

## Licenses

The 2011 Wyoming license was estimated using the prior year's tax rate applied to the estimated 2011 Wyoming assessed value. The 2011 Shoshone–Bannock license fee was estimated using the prior year's actual.

## Franchises

The Oregon franchise tax was determined by applying a city franchise rate to its corresponding electric revenue. For 2011, each cities applicable tax rate was applied to estimated city revenue.

## Forecast Adjustment I—Idaho Energy Resources Co. (“IERCO”) Cost of Service Components

FERC Accounts 418.1 and 419

### *Description*

Account 418.1 includes the utility’s equity in the earnings or losses of subsidiary companies for the year. Account 419 includes interest revenues on securities, loans, notes, advances, special deposits, tax refunds, all other interest-bearing assets, and dividends on stocks of other companies, whether the securities on which the interest and dividends are received are carried as investments or included in sinking or other special fund accounts.

### *Forecast Methodology*

Forecast Adjustment I decreases Idaho Energy Resources Co. (“IERCO”) Cost of Service Components (Accounts 418.1 and 419) by \$945,499 below the 2010 Base of \$7,575,497 resulting in a projected 2011 net income of \$6,629,998.

IPC owns 100% of Idaho Energy Resource Company (“IERCO”), which has a one-third joint venture interest in Bridger Coal Company (“BCC”), a mine that supplies coal to the Jim Bridger plant. PacifiCorp, Inc. owns the remaining two-thirds interest and is the mine’s operating partner. As a one-third owner in BCC, IERCO is entitled to one-third of the BCC net income and cash flows.

The projected 2011 net income of \$6,629,998 incorporates PacifiCorp’s projected activity for the BCC mine. IERCO’s overriding royalties are determined by the location and lease under which BCC is mining. The three leases are with the BLM, Union Pacific Railroad, and State of Wyoming, and each lease pays at a different rate. The overriding royalty was granted to BCC from IERCO, who in turn received them from IPC as advance royalties in the past. Coal royalty payments have no impact on IERCO’s net income as revenue is recognized when paid by BCC, and expense recognized when remitted to IPC.

Income taxes are calculated at the federal tax rate of 35% as Wyoming has no state income tax. Taxes are accrued and paid during the calendar year.

As discussed in the Rate Base Components section that follows, IERCO maintains an intercompany note with IPC that accrues interest monthly at IPC’s short-term borrowing rate, which is projected to be .75% in 2011. For purposes of the Cost of Service Component of IERCO, the intercompany interest expense net of income tax is added back to increase IERCO’s net income.

## RATE BASE COMPONENTS

### Forecast Adjustment J—Electric Plant in Service

Table 1—FERC Account 101

#### ***Description***

This account includes the original cost of electric plant that is included in accounts 301 to 399 (referred to herein as plant accounts). It is described as being owned and used by the utility in its electric utility operations and having an expectation of life in service of more than one year from date of installation, including such property owned by the utility but held by nominees. The cost of additions to and improvements of property leased from others, which are includable in this account, are recorded in subdivisions separate and distinct from those relating to owned property.

#### ***Forecast Methodology***

Forecast Adjustment K increases Electric Plant In Service (Account 101) by \$165,872,190 above the 2010 Base. Electric Plant In Service has been presented using a thirteen-month average.

The methodologies used for plant additions and retirements are described below.

#### ***Plant Additions to Electric Plant In Service***

Projected 2011 plant additions to Electric Plant In Service were developed based on the size of Construction Work in Process (“CWIP”) projects as of year-end 2010 plus the expected 2011 capital expenditures. These capital projects were segregated into pools of greater than and less than \$2 million. Capital projects greater than \$2 million were considered to be known and measureable. For capital projects less than \$2 million, an historical methodology was developed. Once CWIP project types for both pools were determined, the results were then combined and allocated to FERC plant accounts 301 through 399 using a five year historical average. This methodology is consistent with that used in Idaho’s 2008 General Rate Case (Case No. IPC-E-08-10) and Oregon 2009 General Rate Case (Docket No. UE 213).

#### **Projected 2011 Plant Additions**

**Capital Projects in Excess of \$2 Million.** Large capital projects with total costs in excess of \$2 million were determined to be known and measurable adjustments for the 2011 unadjusted test year. Actual capital expenditures in CWIP as of year-end 2010, plus expected 2011 capital expenditures were used in determining the amount that would close to plant by year-end 2011. Allowance for Funds Used During Construction (“AFUDC”) was accrued on the CWIP balances prior to their projected close. In addition, these projects’ capital account balances, projected expenditures, and the timing of closes to plant were reviewed by business unit managers familiar with the projects.

The total amounts for the plant additions in the pool of over \$2 million in capital expenditures were assigned CWIP project types based on the nature of each individual project.

**Capital Projects Less Than \$2 Million.** In recognition of the current uncertain market conditions, anticipated 2011 plant closings were set equal to actual 2010 plant closings for similar-sized projects.

The total amounts for the plant additions in the pool of under \$2 million in capital expenditures were then allocated to the CWIP project types based on a three-year historical average.

All vehicle purchases were considered in total as a single project for this purpose.

### **Allocation to FERC Plant Account**

The above CWIP project type pools were combined for final allocation to FERC plant accounts. For this allocation, actual final closings from CWIP account 107 into Electric Plant In Service, account 101 were analyzed for the five-year period 2005 through 2009. Final closing amounts in the PeopleSoft Asset Management system were used to allocate closings to plant accounts rather than pre-close amounts. Final closes represent the “as built” property units after the construction and work order has been completed and reconciled, whereas pre-closes are based on work order estimates and may not be reflective of the final close distribution. For each CWIP project type, the percentage allocation to FERC plant accounts 301 through 399 was determined by the ratio of the five-year historical plant account closing for that CWIP project type.

### ***Retirements from Electric Plant In Service***

Retirements were analyzed for the five-year period 2005 through 2009. Retirements by FERC plant account were determined and compared to the closings by FERC plant account for the same period. Retirements by FERC plant account were estimated by calculating the historical percentage of retirements to additions for the five-year period.

The following FERC plant accounts have known retirement dates based on vintage layers and were not estimated:

- Account 302—Software
- Account 303—Franchises and Consents
- Account 391—Furniture
- Account 393—Stores Equipment
- Account 394—Shop Tools
- Account 395—Laboratory Equipment
- Account 397—Communication Equipment
- Account 398—Miscellaneous Equipment

## Forecast Adjustments K & L—Accumulated Provision for Depreciation and Amortization

Table 2—FERC Accounts 108 and 111

### ***Description***

Account 108 is credited for amounts charged to account 403, Depreciation Expense, or to clearing accounts for current depreciation expense for electric plant in service. At the time of retirement of depreciable electric utility plant, this account is charged with the book cost of the property retired and cost of removal and then credited with the salvage value and any other amounts recovered such as insurance. When retired, costs of removal and salvage are originally entered in retirement work orders, the net total of such work orders may be included in a separate subaccount hereunder. Upon completion of the work order, the proper distribution to subdivisions of this account shall be made for general ledger and balance sheet purposes as a single composite provision for depreciation. For purposes of analysis, however, each utility shall maintain subsidiary records in which this account is segregated according to the functional classification of electric plant in service. Account 111 is credited with amounts charged to account 404, Amortization of Limited-Term Electric Plant, for the current amortization of limited-term electric plant investments.

### ***Forecast Methodology***

Forecast Adjustments L & M increase Accumulated Provision for Depreciation and Amortization (Accounts 108 and 111) by \$63,737,756 and \$2,820,040 respectively, above the 2010 Base. The accumulated provision for depreciation and amortization has been presented using a thirteen-month average. The 2011 forecast was developed by first determining the 2010 monthly balances and then building upon that to determine the 2011 thirteen-month account balances. The process began with the year-end 2010 accumulated depreciation and amortization account balances which were rolled forward monthly using the estimated 2011 depreciation and amortization expense accruals, retirements, salvage, and removal costs. See account 403 and 404 in the Cost of Service Components section for discussion with respect to the depreciation and amortization accrual calculation and Electric Plant In Service, account 101 in the Rate Base Components section for discussion of the method of determining retirements. The five-year (2006–2010) average salvage, removal costs, and retirements were then calculated. The salvage and removal averages as a percentage of the retirement average were used to estimate monthly salvage and removal costs. Those amounts were allocated to the transmission and distribution FERC plant accounts in their respective ratio to estimated retirements.

## Forecast Adjustment M—Materials and Supplies

Table 3—FERC Accounts 154 and 163

### ***Description***

Account 154 includes the cost of materials purchased primarily for use in the utility business for construction, operation, and maintenance purposes. Materials and supplies issued are credited hereto and charged to the appropriate construction, operating expense, or other account on the basis of a unit price determined by the method of inventory accounting. Account 163 includes the cost of supervision, labor, and expenses incurred in the operation of general storerooms, including purchasing, storage, handling, and distribution of materials and supplies. This account is cleared by adding to the cost of materials and supplies issued a suitable loading charge which distributes the expense equitably over stores issues. The balance in the account at the close of the year shall not exceed the amount of stores expenses reasonably attributable to the inventory of materials and supplies.

### ***Forecast Methodology***

Forecast Adjustment N reflects a \$657,159 decrease in Materials and Supplies (accounts 154 and 163) below the 2010 Base.

The thirteen-month average decrease was due partially to a concerted effort to reduce inventories, as a result of the economic slow-down. Specifically, account 154.220 from the December 2009 to December 2010 decreased by \$1,481,473. Additionally, IPC over cleared overheads included in the 163 accounts by \$935,723. However, while the thirteen-month average reflects a decrease to rate base, the December 2011 year-end balance is expected to increase over the 2010 year-end balance by \$1,590,713 based on the following:

- M & S Steam Plant is forecasted to increase \$241,336 based on the January 2009 through February 2011 actuals.
- The new Langley Gulch gas plant is expected to cause an increase in inventories by \$250,000.
- Stores Expense Undistributed was increased \$1,071,985 to the amount forecasted by the Financial Stores Loading model at December 31, 2011. As stated above, the 2010 ending balance in these accounts was artificially low due to inventory issues being greater than projected in the fourth quarter 2010.
- Stores Expense Steam Plant is estimated to decrease \$495,149 based on trending actual month-end balances for the time period January 2009 through February 2011.
- The balance in the Sales Tax account (163500) is forecasted to increase \$522,541 due to the 2010 ending balance in this account being lower than required due to timing variances with issues and invoice processing.



## Forecast Adjustment N—Other Deferred Programs

Table 3—FERC Accounts 182.3 and 186

### **Description**

This account includes the amounts of regulatory assets not includable in other accounts resulting from the ratemaking actions of regulatory agencies.

### **Forecast Methodology**

Forecast Adjustment O increases Other Deferred Programs (Accounts 182.3 and 186) by \$146,580 above the 2010 Base.

#### **Accounts 186.722 and 186.770—American Falls Bond Refinancing, IPUC Order No. 25880.**

These deferred costs are financing costs related to American Falls Bond issuances. The total monthly amortization of these two bonds is \$5,212 per month or \$62,552 per year. IPC has reduced the 2010 Base for one year of additional depreciation for \$62,552, resulting in a total deferral of \$823,593.

**Account 182.349—Intervenor Funding, IPUC Order No. 30722.** This account includes intervenor funding ordered in the 2008 General Rate Case (Case No. IPC-E-08-10). In that case, IPC was ordered to pay the Community Action Partnership Association of Idaho (“CAPAI”) \$9,183 in costs as a result of their participation in the case. IPC has assumed a one-year amortization period for recovery of these costs in this case. This reduced the deferral by the 2010 Base of \$10,572 including accrued interest, resulting in a total deferral forecast of \$0.

**Account 182350—Intervenor Funding, IPUC Order No. 30722.** This account includes intervenor funding ordered in the 2008 General Rate Case (Case No. IPC-E-08-10). In that case, IPC was ordered to pay the Idaho Irrigation Pumpers Association, Inc. (“Irrigators”) \$30,817 in fees and expenses as a result of their participation in the case. IPC has assumed a one-year amortization period for recovery of these costs in this case. This reduced the deferral by the 2010 Base of \$35,480 including accrued interest, resulting in a total deferral forecast of \$0.

**Account 182.345—Citizens Utility Board (“CUB”) 2010 Funding Grant, OPUC Order No. 10-406.** IPC was ordered in Docket UM 1504(1) to fund \$30,000 to CUB pursuant to the terms of the Intervenor Funding Agreement by and among IPC and CUB and approved by the OPUC in Order no. 10-396. As a result, IPC has assumed a one-year amortization period for recovery of these costs in this case. This reduced the deferral by the 2010 Base of \$30,100 including accrued interest, resulting in a total deferral balance of \$0.

**Account 182.339—SFAS 87 Capitalized Pension Costs, OPUC Order No. 10-064.** IPC included a forecast adjustment of \$383,271 for its capitalized portion of its SFAS 87 Capitalized Pension Costs. This brings the total 2011 estimate to \$1,323,161.

**Account 182.369—Grid West Loans, OPUC Order No. 06-483.** IPC has included a reduction to its 2010 Base of \$14,191 for one year of additional amortization, bringing the test year deferral balance to \$44,937.

**Account 182.304—Grid West Loans, FERC Portion.** IPC has included a reduction to its 2010 Base for \$83,796 for one year of additional amortization, bringing the test year deferral balance to \$111,728.

## **Forecast Adjustment O—Customer Advances for Construction (“CAC”)**

Table 3—FERC Account 252

### ***Description***

Account 252 includes advances by customers for construction which are to be partially or wholly refunded. When a customer is refunded the entire amount to which he or she is entitled according to the agreement or rule under which the advance was made, any remaining balance is credited to the appropriate plant account.

### ***Forecast Methodology***

Forecast Adjustment Q decreases the Customer Advances for Construction (Account 252) 2010 Base by \$6,304,446, based on an estimated thirteen-month average balance.

IPC investigated various methods to forecast this account, including the average dollar balance per customer methodology that was used in the 2008 Idaho General Rate Case (IPC-E-08-10) and Oregon 2009 General Rate Case (Docket No. UE 213). However, because of new Rule H changes this method became inaccurate. Therefore, IPC determined that because customer advances are driven primarily by customer growth, the most reasonable method was to start with the December 2010 Base for account 252, removing all balances related to Construction Work in Progress, then reducing the balance by the subdivision lots completed in 2006, as these will be either refunded or absorbed by the end of 2011. IPC then reduced the balance further by annualizing the 2010 lot refunds for work completed from 2007 to 2009 as the estimate for 2011 lot refunds that fall inside the 5-year period for refunds. This method reflects the IPC’s anticipation that market conditions in 2011 will be similar to those existing in 2010. Finally, IPC added in the estimated ending unusual conditions and network transmission upgrade balances. IPC’s removal of balances associated with Construction Work in Progress is because these should not be included to reduce rate base since Construction Work in Progress is not a rate-based item. Please see the analysis in the following table:

<b>2011 Forecast of Customer Advances</b>	<b>Total</b>
12/31/10 LXMN lot refund balance excluding net work transmission upgrades and unusual conditions	\$19,146,937
2006 lot refund balance to be refunded or absorbed in 2011	(4,497,506)
2011 estimated refunds estimated ending balances	(831,772)
Unusual conditions refunds estimated ending balance	973,225
Network transmission upgrades estimated balance excluding work in progress	837,500
<b>12/31/11 estimated customer advances excluding work in progress and unusual conditions</b>	<b>\$15,628,384<sup>1</sup></b>

<sup>1</sup> This amount represents the estimated year-end balance. IPC has estimated the thirteen-month balance of \$17,261,533 based on the shape of the 2010 actual thirteen-month average balance.

## Forecast Adjustment P—Idaho Energy Resources Co. (“IERCO”) Rate Base

Table 3—FERC Accounts 123.1, 186, and 145

### *Description*

Account 123.1 includes the cost of investments in securities issued or assumed by subsidiary companies and investment advances to such companies, including interest accrued thereon when such interest is not subject to current settlement plus the equity in undistributed earnings or losses of such subsidiary companies since acquisition. This account is credited with any dividends declared by such subsidiaries. This account is maintained in such a manner as to show separately for each subsidiary: (1) the cost of such investments in the securities of the subsidiary at the time of acquisition, (2) the amount of equity in the subsidiary’s undistributed net earnings or net losses since acquisition, and (3) advances or loans to such subsidiary. Account 145 represents notes receivable from associated companies. Account 186 includes all debits not elsewhere provided for, such as miscellaneous work in progress, and unusual or extraordinary expenses, not included in other accounts, which are in process or amortization and items the proper final disposition of which is uncertain.

### *Forecast Methodology*

Forecast Adjustment R increases Idaho Energy Resources Co. (“IERCO”) Rate Base (Account 123.1, 186 and 145) by \$154,130 above the 2010 Base.

IPC’s projected 2011 investment in IERCO is based on actual activity for 2010 at the Bridger Coal Company (“BCC”) mine that supplies coal to the Jim Bridger thermal plant. As a one-third owner in BCC, IERCO is entitled to 33% of the BCC net income and cash flows.

- **Account 123.1—Investment in IERCO.** The 2011 thirteen-month average investment in IERCO balance is projected to increase \$7,609,643 from the 2010 Base thirteen-month average balance of \$67,582,237 to \$75,191,880. IERCO’s investment in BCC is

accounted for using the equity method. BCC income, IERCO income, and IERCO capital contributions to BCC increase the investment balance; while BCC dividend distributions to IERCO reduce the investment balance. The \$7,609,643 increase is due to reinvesting one year worth of after tax earnings into BCC. No dividend assumptions were made during the forecast test year. Instead, any extra cash remaining after paying operating expenses and capital investment are returned to IPC via the intercompany note (see below for discussion of account 145—IERCO Intercompany Note).

- **Account 186—Prepaid Coal Royalties.** The 2011 thirteen-month average balance is projected to decrease \$68,132 from the 2010 Base thirteen-month average balance of \$1,464,357 to \$1,396,225. BCC overriding coal royalties are determined by the location and lease under which BCC is mining. The overriding royalty was granted to BCC from IERCO, who in turn received them from IPC as advance royalties in the past. Although coal royalty payments have no impact on IERCO's net income, because revenue is recognized when paid by BCC and expense recognized when remitted back to IPC, the payment flow serves to reduce the account 186 balance.
- **Account 145—Notes Payable To/Receivable from Subsidiary.** The 2011 thirteen-month average balance is projected to decrease \$7,387,381 from the 2010 Base thirteen-month average balance of \$19,880,651 to \$12,493,269. The IERCO intercompany note is the funding mechanism whereby IERCO not only receives distributions from and makes capital contributions to BBC, but also pays income taxes and dividends to IPC. The intercompany note activity is based on the projected 2011 BCC operating and capital budgets. Because capital expenditures have been leveling off, BBC is projected to have extra cash in 2011 to reduce the note balance. Interest on the intercompany note is based on IPC's short-term borrowing rates and accrues monthly. The average interest rate used is .75%.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**  
**DIRECT TESTIMONY**  
**OF**  
**KELLEY NOE**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Kelley Noe. My business address is 1221 West Idaho Street, Boise,  
3 Idaho.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company ("Idaho Power" or "Company") as a  
6 Regulatory Analyst II.

7 **Q. Please describe your educational background.**

8 A. In May of 2004, I received a Bachelor of Business Administration in Finance from  
9 Boise State University.

10 **Q. Please describe your business experience with Idaho Power Company.**

11 A. In September 2006, I accepted a position at Idaho Power as a Financial Analyst in  
12 the Finance Department. My responsibilities as a Financial Analyst were two-fold.  
13 For the credit analysis portion of my position, I was responsible for gathering  
14 counterparty credit and financial information, preparing a risk analysis, and then  
15 approving an appropriate credit limit assignment. When necessary, I negotiated  
16 security or collateral documents that met corporate credit standards and tracked the  
17 documents to ensure they were current and up-to-date. In addition, I prepared  
18 monthly credit reports for management. The other responsibilities in my position  
19 included providing the financial support for the Grid Operations, Planning, and  
20 Operations Analysis and Development groups. This included preparing studies,  
21 reports, analyses, and recommendations in areas such as budgets, forecasts, capital  
22 expenditure proposals, financial plans, and regulatory requirements. In October  
23 2010, I accepted a Regulatory Analyst II position within the Regulatory Affairs  
24 Department of the Company. My duties as a Regulatory Analyst II include gathering,  
25 analyzing, and coordinating data from various departments throughout the Company  
26

1 required for development of jurisdictional separation studies, as well as other  
2 analyses that may be required.

3 **Q. What is the scope of your testimony in this proceeding?**

4 A. I am sponsoring testimony to summarize the annualizing adjustments to the 2011  
5 unadjusted forecast test year data used by the Company for purposes of forecasting  
6 the Company's rate base, revenues, and expenses for the 2011 Test Year. My  
7 testimony will also quantify the Oregon Jurisdictional Revenue Requirement resulting  
8 from the Jurisdictional Separation Study ("JSS") for the 12 months ending December  
9 31, 2011.

10 **Q. Have you prepared exhibits for this proceeding?**

11 A. Yes. I am offering the following exhibits:

- 12 1. Exhibit 901, Major Plant Additions Annualized for 2011
- 13 2. Exhibit 902, Depreciation & Amortization Annualizing Adjustments
- 14 3. Exhibit 903, Summary of Payroll-Related Annualizing Adjustments
- 15 4. Exhibit 904, Development of System Revenue Requirement
- 16 5. Exhibit 905, Jurisdictional Separation Study - Oregon Revenue  
17 Requirement

18 **Q. Could you briefly summarize how the Company developed its 2011 Test Year?**

19 A. Yes. As described in the testimonies and exhibits of Mr. Douglas N. Jones and Mr.  
20 Timothy E. Tatum, the development of the 2011 Test Year begins with 2010 actual  
21 financial data ("2010 Actuals"). The 2010 Actuals were adjusted to reflect currently  
22 approved ratemaking adjustments and arrive at 2010 adjusted actual financial  
23 information ("2010 Base"). The 2010 Base was then adjusted to reach 2011  
24 forecasted financial levels ("2011 Unadjusted Test Year"). After the 2011  
25 Unadjusted Test Year figures were compiled, they were provided to me as the  
26



1 starting point for the development of the Company's total 2011 Test Year figures  
2 used in this filing.

3 **Q. Were any additional adjustments made to the 2011 Unadjusted Test Year**  
4 **amounts to reach the Company's total 2011 Test Year figures?**

5 A. Yes. Exhibits 901 through 903 illustrate the annualizing adjustments used to develop  
6 the total 2011 rate base and net income figures used in the Company's 2011 Test  
7 Year.

8 **Q. Please describe the role of annualizing adjustments in this filing.**

9 A. At Mr. Tatum's direction, I performed a number of annualizing adjustments to  
10 amounts that are incurred within the test year, but need to be reflected for the full  
11 year on an ongoing basis.

12 **Q. Please describe the annualizing adjustments made for "Major Plant Additions."**

13 A. Major Plant Additions illustrated in Exhibit 901 are defined as those investments  
14 exceeding \$2 million that will close to the Company's electric plant in service  
15 accounts during the calendar year 2011. A month-by-month forecast of 2011 electric  
16 plant in service and the 13-month average balances provided by Mr. Jones form the  
17 beginning point for the analysis. Annualizing adjustments are applied only to the  
18 2011 plant additions that qualify as Major Plant Additions to establish the amount of  
19 investment that would have been recorded had the plant been in service throughout  
20 the entire year. The difference between what had been forecast for these  
21 investments in the initial analysis compared to the annualized forecast, as illustrated  
22 in column 3 – Net Annualizing Adjustments, is the \$31,599,458 annualizing  
23 adjustment for the Company's electric plant in service investment in this filing.  
24 Additional annualizing adjustments associated with Major Plant Additions include  
25 \$132,419 in property taxes (column 6 – Annual Composite Property Tax) and  
26 \$12,008 in property insurance (column 8 – Annual Insurance Expense).

1 **Q. Please describe Exhibit 902 - Depreciation & Amortization Annualizing**  
2 **Adjustments.**

3 A. Depreciation and amortization expenses are forecast on a month-by-month basis  
4 during 2011 and summarized in the column entitled "Forecasted Depreciation  
5 Expense." The expenses for December 2011 are multiplied by 12 to calculate the  
6 "Annualized Depreciation Expense." The difference between these two columns  
7 equals the "Annualizing Adjustment" of \$2,225,161 depreciation expense and  
8 \$189,455 amortization expense. Adjustments of \$1,125,683 to Accumulated  
9 Depreciation and \$94,728 to Accumulated Amortization, illustrated as the "Reserve  
10 Adjustment," are conventionally computed as half the expense amounts.

11 **Q. Please continue by explaining Exhibit 903, Summary of Payroll-Related**  
12 **Annualizing Adjustments.**

13 A. There are two additional labor-related annualizing adjustments in this filing totaling  
14 \$4,332,883.

15 The first adjustment utilizes 2010 actual labor data as a proxy to annualize  
16 2011 payroll and reflect an entire year of expense at that year-end level. Because  
17 the method applied to forecast the 2011 operations and maintenance ("O&M") labor  
18 expense (detailed in the testimony by Mr. Tatum) provided only a forecast of the  
19 annual 2011 O&M labor expense, a December labor expense amount from which a  
20 conventional annualizing labor adjustment could be calculated was not known.  
21 Therefore, an annualizing adjustment based upon actual 2010 labor was calculated  
22 and used as a proxy to adjust the O&M labor total for the 2011 Test Year. After  
23 applying the Company's Operations & Maintenance and benefit loading percentages,  
24 the annualizing adjustment is \$1,955,023.

25 The second adjustment of \$2,377,859 reflects the projected 2012 salary  
26 structure adjustment of 2 percent. This adjustment was applied to the annualized

1 2011 payroll and has been adjusted by the Company's O&M and benefit loading  
2 percentages.

3 **Q. Please describe Exhibit 904, Development of System Revenue Requirement.**

4 A. Exhibit 904 provides the development of the adjusted total electric system rate base  
5 and net income for the test year ending December 31, 2011.

6 The first set of data, displayed in column 3 - "2010 Actual", is the unadjusted  
7 2010 actual results of operations provided by Mr. Jones. The adjustments proposed  
8 by the Company for purposes of developing the 2011 adjusted total electric system  
9 combined rate base and net income are shown in columns 4, 6, and 8 with the total  
10 system adjusted test year rate base, expenses, and revenues summarized in column  
11 9. The columns are as follows:

12 (1) Column 4, titled "2010 Actual Adjustments" was provided by  
13 Mr. Jones and Mr. Scott Wright. It reflects currently approved regulatory  
14 adjustments that should be applied to the 2010 actual results prior to applying  
15 methods to adjust to 2011 levels;

16 (2) Column 5, titled "2010 Base" is the adjusted base to which the  
17 methods to create a 2011 Test Year were applied;

18 (3) Column 6, titled "Forecast Adjustments" reflects the results of  
19 the various methods from the Forecast Methodology Manual sponsored by  
20 Mr. Tatum and detailed in his testimony, that were used to adjust totals from  
21 the 2010 Base to a 2011 Unadjusted Test Year.

22 (4) Column 7, titled "2011 Unadjusted Test Year" includes the  
23 resulting dataset after the standard regulatory adjustments and various  
24 methods were applied;

25 (5) Column 8, titled "Annualizing Adjustment" includes standard  
26 annualizing adjustments, to reflect changes that occur within the test year,

1 but need to be incorporated for the full year on an ongoing basis. All  
2 annualizing adjustments included in this filing were discussed earlier in my  
3 testimony.

4 (6) Column 9, titled "2011 Test Year" is the resulting dataset for  
5 the 2011 Test Year (12 months ending December 31, 2011).

6 **Q. Please describe page 2 of Exhibit 904.**

7 A. Page 2 of Exhibit 904 summarizes the development of rate base components for the  
8 2011 Test Year. The total combined rate base, based on actual, unadjusted 2010  
9 results was \$2,420,460,776 (column 3, line 63). After adjustments, the total  
10 combined rate base for the 2011 Test Year increases to \$2,499,296,901 (column 9,  
11 line 63).

12 Page 2 of Exhibit 904 also includes the development of the total system net  
13 income for the 12 months ending December 31, 2011. Operating revenues are  
14 summarized on line 69. Total operating expenses are summarized on line 80.

15 **Q. Have you prepared an exhibit that sets forth the Oregon jurisdictional revenue  
16 deficiency?**

17 A. Yes. I prepared Exhibit 905, titled "Jurisdictional Separation Study – Oregon  
18 Revenue Requirement" consisting of 35 pages.

19 **Q. Please describe Exhibit 905.**

20 A. Exhibit 905 is the complete Jurisdictional Separation Study report detailing the  
21 allocation of each component of rate base, operating revenues, and expenses by  
22 Federal Energy Regulatory Commission ("FERC") account resulting in the Oregon  
23 jurisdictional revenue deficiency. The JSS is organized as follows:

- 24 • Summary of Results
- 25 • Table 1 - Electric Plant in Service
- 26 • Table 2 - Accumulated Provision for Depreciation (and Amortization)

- 1 • Table 3 - Additions & Deductions to Rate Base
- 2 • Table 4 - Operating Revenues
- 3 • Table 5 - Operation & Maintenance Expenses
- 4 • Table 6 - Depreciation & Amortization Expense
- 5 • Table 7 - Taxes Other Than Income Taxes
- 6 • Table 8 - Regulatory Debits & Credits
- 7 • Table 9 - Income Taxes
- 8 • Table 10 - Calculation of Federal Income Tax
- 9 • Table 11 – Oregon State Income Tax
- 10 • Table 12 – Idaho State Income Tax and Other State Income Tax
- 11 • Table 13 - Development of Labor Related Allocator
- 12 • Table 14 - Allocation Factors
- 13 • Table 15 - Allocation Factors-Ratios

14 **Q. Please discuss the methodology used to jurisdictionally separate costs in the**  
15 **preparation of this study.**

16 A. A three-step process was used to separate costs among jurisdictions. The three  
17 steps are classification, functionalization, and allocation of costs. In all three steps,  
18 recognition was given to the way in which costs are incurred by relating these costs  
19 to utility operations.

20 **Q. Would you please briefly explain the meaning of classification,**  
21 **functionalization, and allocation?**

22 A. Classification groups costs into three categories: demand-related, energy-related,  
23 and customer-related.

24 In addition to classification, costs are functionalized; that is, costs are  
25 identified with utility operating functions such as generation, transmission, and  
26 distribution. Individual plant items are examined and, where possible, the associated

1 investment costs are assigned to one or more operating functions. Once the  
2 Company's total system costs are classified and assigned to the appropriate  
3 function, they are allocated among jurisdictions.

4 The process of allocation is one of apportioning the total system cost among  
5 jurisdictions by introducing allocation factors into the process. An allocation factor is  
6 an array of numbers that specifies the jurisdictional value as a share or percent of  
7 the total system quantity. For example, in the case of energy-related costs, the  
8 allocation factor is annual jurisdictional energy use, adjusted for losses, divided by  
9 the total system energy use.

10 Once individual accounts have been allocated to the various jurisdictions, it is  
11 possible to summarize these into total utility rate base and net income by jurisdiction.  
12 The results are stated in a summary form to measure adequacy of revenues for the  
13 jurisdiction under consideration. The measure of adequacy is typically the rate of  
14 return earned on rate base, which is compared to the requested rate of return.

15 **Q. Is the methodology used to separate costs by jurisdiction and calculate the**  
16 **Oregon jurisdictional revenue requirement in the present case primarily the**  
17 **same methodology utilized in the Company's last general rate case, Docket**  
18 **No. UE 213?**

19 A. While the allocation methodology is primarily the same as in the Company's last  
20 general rate case, Docket No. UE 213, there are some proposed modifications in this  
21 filing. The primary change in methodology addresses how the Company proposes to  
22 allocate FERC Firm Transfer customers' transmission and distribution investments  
23 and related revenues and expenses.

24 **Q. Why have you included this change in methodology in regards to the FERC**  
25 **Firm Transfer customers?**

26

1 A. This change in methodology is the direct result of research by the Company's FERC  
2 & Regional Regulatory Affairs group in conjunction with Mr. Tatum as well as other  
3 members of the Regulatory Affairs group. The proposed methodology was reviewed  
4 and approved by the Company's Senior Management for use in the 2011 Test Year.

5 **Q. Please describe the proposed change in methodology to the allocation of the**  
6 **Company's FERC Firm Transfer jurisdiction.**

7 A. Under the Company's traditional jurisdictional allocation methodology, allocations  
8 assumed that each jurisdiction's transmission and distribution responsibility was  
9 proportional to the demand that each jurisdiction placed on the Company's system.  
10 The identical allocation methodology was applied uniformly by the Company for both  
11 its retail and Firm Transfer customers.

12 In 2006, the Company was authorized by the FERC to implement a formula  
13 rate for transmission service provided under its Open Access Transmission Tariff  
14 ("OATT"). It should be noted that Idaho Power Company itself is the Company's  
15 largest transmission customer because its retail customers are subject to the OATT  
16 formula rates as authorized by FERC when the Company buys and sells on behalf of  
17 its retail customers.

18 The FERC's OATT formula rate calculation does not synchronize with the  
19 Company's currently approved allocation methodology in significant ways. Under the  
20 formula rate, FERC prescribes defined classifications of plant and expenses  
21 authorized for functionalization as transmission and thereby billable to its Firm  
22 Transfer customers under the rates of the Company's OATT. This FERC-specific  
23 functionalization of transmission plant and expenses departs from the Company's  
24 current JSS model in the following areas:

- 25 • The OATT rate does not allow for inclusion of any distribution facilities  
26 or expenses and therefore, allocation of distribution-related costs to the

1 company's Firm Transfer customers should be removed from the retail  
2 ratemaking model.

3 • The OATT rate specifically excludes Load Dispatching Expenses so  
4 they should not be allocated to Firm Transfer customers in the retail  
5 ratemaking model.

6 • The OATT rate specifically excludes generator step-up stations and  
7 generator interconnection facilities so they should not be allocated to Firm  
8 Transfer customers in the retail ratemaking model.

9 The OATT rate formula's divergence from the Company's currently approved  
10 rate making methodology manifests itself in a host of ways creating many  
11 opportunities for double-counting or exclusions if attempting to harmonize the two  
12 differing methodologies into a single allocation method. Therefore, the Company is  
13 proposing to change JSS methodology to allocate all Firm Transfer investments,  
14 expenses and revenues to the retail jurisdictions, in a manner similar to how the  
15 other two public utilities providing service in Oregon (Pacific Power – Order No. 05-  
16 021 and Portland General Electric – Docket No. UE 215) handle FERC-related costs  
17 and revenues as well as align the Oregon JSS with what the Company filed in Idaho  
18 (Case No. IPC-E-11-08).

19 **Q. Besides the FERC Firm Transfer-related allocation changes, is the Company**  
20 **proposing any other methodology modifications?**

21 A. Yes. Since the last general rate case, the Company has evaluated its allocation of  
22 tax-related rate base and expense line items. In each instance, the Company has  
23 sought to more properly align the tax item's allocation with its causation or  
24 fundamental association. For example, Account 190 - Accumulated Deferred  
25 Income Taxes has formerly been allocated over the Company's "Total Plant"  
26 investment. However, upon examination, revisions in this filing are made to allocate



1 portions of Account 190 over “DA252 – Customer Advances for Construction” and  
2 “Labor” to more closely align allocations with the primary components within the  
3 account. Another example is “Idaho Energy Resources Company (“IERCO”)  
4 Taxable Income” which is no longer being allocated by “State Taxable Income” but  
5 rather allocated in this filing over the Company’s energy allocator in order to be  
6 consistent with the allocation of IERCO rate base investment and related income.

7 In summary, each tax-related line item in the JSS for this filing has been  
8 evaluated to determine the most appropriate allocation based on causation or  
9 fundamental association to the Company’s investments or other underlying  
10 foundation. A comprehensive list of all the tax-related changes is included in my  
11 workpapers.

12 **Q. How have the various functional plant and cost items been allocated?**

13 A. The average of the 12 monthly coincident peak demands was used to allocate the  
14 demand-related costs. This allocation method has been used by the Company for at  
15 least two decades in all of its filings requiring a jurisdictional separation study. This  
16 allocation method was adopted by this Commission and also accepted by the Idaho  
17 Public Utilities Commission. The demand-related allocation factors used in the study  
18 are designated as D10, D11, D12, and D60. The respective values used in these  
19 demand allocation factors are shown at line numbers 1029 through 1032 of Exhibit  
20 905.

21 **Q. How were the energy-related expenses allocated among jurisdictions?**

22 A. Energy-related expenses were allocated based on normalized jurisdictional kilowatt-  
23 hour sales and adjusted for losses to establish energy requirements at the  
24 generation level. The energy-related allocation factors used in the study are  
25 designated as E10 and E99. The respective values used in these energy allocation  
26 factors are shown on lines 1035 and 1036 of Exhibit 905.

1 **Q. What was the method by which you allocated customer-related costs?**

2 A. The principal customer-related expenses which required allocation were meter  
3 reading (FERC Account 902) and customer accounting and billing (FERC Account  
4 903). These accounts were allocated based upon a review of actual Company  
5 practice of reading meters and preparing monthly bills or statements.

6 **Q. What method was used to allocate certain labor-related administrative and  
7 general expenses?**

8 A. In accordance with FERC-approved procedures, administrative and general  
9 expenses were allocated in accordance with functionalized wages and salaries.  
10 These labor-related allocation factors are shown on lines 829 through 1025 of Exhibit  
11 905.

12 **Q. Please describe the derivation of the 2011 total system allocation factors used  
13 in this case.**

14 A. The allocation factors in the 2011 JSS were based on either the 2010 year-end data  
15 or 2011 assumptions. The capacity or demand-related allocation factors (D10, D11,  
16 D12, and D60) were created using the 2010 demand ratios from the load research  
17 sample applied to the 2011 Test Year energy. The energy-related allocation factors  
18 were the 2011 Test Year load at generation level (E10) and at customer level (E99).

19 **Q. Briefly describe the manner in which you allocated electric plant in service as  
20 shown in Table 1 of Exhibit 905.**

21 A. Production plant was allocated to all jurisdictions based on the average of the 12  
22 monthly coincident peaks. Unless otherwise noted, allocation of transmission and  
23 distribution plant was based on the same methodology.

24 **Q. Would you describe the functional categories used for allocation and direct  
25 assignment of transmission plant and distribution substations?**

26

1 A. "Transmission facilities" are the facilities that form the bulk of the power transmission  
2 system together with transmission, step-up substation facilities required to introduce  
3 the Company's generation into the power supply system, and include facilities rated  
4 at 500 kilovolts ("kV") through 100 kV. "Distribution facilities" refer to lower voltage  
5 lines and the substation facilities that provide localized service. Some transmission  
6 and distribution facilities were directly assigned to the customers who paid for the  
7 exclusive use of those facilities. As previously discussed in this testimony, there are  
8 some proposed modifications to the direct assignment and allocation of FERC  
9 Network Service-related investments in this filing.

10 **Q. Please describe the manner in which you allocated general electric plant in**  
11 **service.**

12 A. General Plant was allocated on the same basis as the sum of the allocated  
13 investments in production, transmission, and distribution plant.

14 **Q. How have you allocated the accumulated provision for depreciation and**  
15 **amortization of other utility plant?**

16 A. Accumulated Provision for Depreciation was allocated among jurisdictions as shown  
17 on Table 2 of Exhibit 905. The accumulated totals for each type of production plant  
18 and for each primary plant account in other functional groups were allocated based  
19 on the related plant account as allocated in Table 1. Amortization of other utility  
20 plant was functionalized and then allocated based on the related plant items as  
21 allocated in Table 1.

22 **Q. Please describe Table 3 of Exhibit 905.**

23 A. Table 3 details the allocation of all other additions to or deductions from rate base.  
24 Deductions from rate base include customer advances for construction that were  
25 directly assigned to customers by jurisdiction, and the accumulated deferred income  
26 taxes that were allocated by plant, customer advances for construction, and labor.

1 Additions to rate base include: (1) materials and supplies which were functionalized  
2 and allocated by the respective plant allocators, (2) fuel inventory that was allocated  
3 on the basis of energy, (3) components of IERCO, the Company's fuel subsidiary,  
4 which were allocated based on energy, and (4) Commission-ordered deferred  
5 investment was either directly assigned to a specific jurisdiction or allocated based  
6 on energy.

7 All rate base items, with the exception of accumulated deferred income taxes  
8 and other deferred programs, reflect a 13-month average of ending balances.

9 **Q. Please describe Table 4 of Exhibit 905.**

10 A. Table 4 contains the adjusted firm operating revenues directly assigned to each  
11 jurisdiction for the test year (12 months ending December 31, 2011). Contractual  
12 Hoku first block energy sales revenues are allocated to each jurisdiction in proportion  
13 to generation-level energy usage. Opportunity sales, non-firm energy sales to other  
14 utilities, are also credited to each jurisdiction in proportion to generation-level energy  
15 use.

16 Other operating revenues were either allocated among jurisdictions in a  
17 manner that offset related allocations of rate base or, where a particular revenue  
18 item could be associated with a specific jurisdiction, directly assigned.

19 **Q. Briefly describe the methods by which Operation and Maintenance Expenses  
20 were allocated.**

21 A. The allocation of each O&M expense is detailed on Table 5 of Exhibit 905. In  
22 general, the basis for each allocation is identifiable with the source code listed on  
23 Exhibit 905. Demands are identified by a source code beginning with a "D" prefix,  
24 energy use is identified by a source code beginning with an "E" prefix, related plant is  
25 identified by a line number source code, and customer-weighted allocation factors  
26 begin with a "CW" prefix.

1 **Q. In what manner are supervision and engineering expenses treated throughout**  
2 **the allocation of Operation and Maintenance Expenses?**

3 A. For the applicable expense account in each functional group, the labor component  
4 was separately allocated in accordance with the detail provided on Table 13 of  
5 Exhibit 905. The total of allocated labor in each functional group became the basis  
6 for the allocation of supervision and engineering expense. Total allocated labor  
7 expense served the additional purpose of allocating employee pension and other  
8 labor-related taxes and expenses. Table 13 of Exhibit 905 details the development  
9 of all the labor-related allocation factors used in this study.

10 **Q. Please describe Table 6 of Exhibit 905.**

11 A. The allocation of depreciation expense and amortization of limited term plant is set  
12 forth on Table 6. These expenses were identified by type of production plant or by  
13 primary plant account for other functional plant groups and allocated consistent with  
14 the related plant account.

15 **Q. Please describe Table 7 of Exhibit 905 and the allocation of Taxes Other Than**  
16 **Income Taxes.**

17 A. Taxes Other Than Income Taxes were treated individually and allocated in a manner  
18 consistent with the bases by which the respective taxes are assessed.

19 **Q. Please describe Table 8 of Exhibit 905.**

20 A. Table 8 of Exhibit 905 details the amortization of regulatory debits and credits.

21 **Q. Please describe Table 9 of Exhibit 905.**

22 A. The expenses shown on Table 9 consist of deferred income taxes and the  
23 investment tax credit adjustments which were allocated based on the Company's  
24 plant investment and net income before tax adjustments. State and federal income  
25 tax liabilities are also summarized on Table 9. The income taxes shown on Tables  
26 10 through 12 were obtained from the Company's Tax Department.

1 **Q. Please describe how you allocated federal and state income taxes shown on**  
2 **Tables 10 through 12 of Exhibit 905.**

3 A. The respective tax bases were developed, and taxes were calculated directly for  
4 each jurisdiction. Operating income before taxes represents adjusted operating  
5 revenues less all adjusted operating expenses treated heretofore with the exception  
6 of deferred income taxes and investment tax credits. Adjusted interest expense was  
7 allocated by the combined rate base to develop net operating income before taxes.  
8 As discussed earlier in this testimony, subsequent additions to or deductions from  
9 the respective tax bases were allocated to each jurisdiction by aligning it with its  
10 causation or fundamental association. In this manner, taxable income for each  
11 jurisdiction was developed and the appropriate tax rate was applied. Final tax  
12 amounts result after the allocation of adjustments and tax credits. All details relating  
13 to the calculation of federal, Oregon, Idaho, and other state income taxes are found  
14 on Tables 10, 11, and 12.

15 **Q. Please describe Tables 13 through 15 of Exhibit 905.**

16 A. Tables 13 through 15 of Exhibit 905 list the principal allocation factors used in the  
17 JSS and the respective jurisdictional values for each allocation factor. Table 15 lists  
18 the ratios of the principal allocation factors included in Table 14.

19 **Q. Please describe the development of the Oregon jurisdictional revenue**  
20 **deficiency.**

21 A. The summary of JSS results is presented on pages 1 and 2 of Exhibit 905. The  
22 development of the Oregon jurisdictional revenue deficiency is presented in the  
23 column entitled "Oregon Retail" on page 1 of Exhibit 905. The Oregon consolidated  
24 operating income of \$6,394,048 (line 27) resulted in a return on rate base of 5.25  
25 percent (line 28). Based upon the Company's request for an overall rate of return of  
26 10.5 percent provided by Mr. Steve Keen, the Company's Oregon jurisdictional net

1 income should be \$9,955,453, as shown on line 33. The resulting earnings  
2 deficiency is \$3,561,404, as shown on line 34.

3 **Q. What net-to-gross or incremental income tax factor did you use in developing**  
4 **the Oregon jurisdictional revenue deficiency?**

5 A. The composite incremental tax multiplier of 1.642 is the assimilation of the federal  
6 effective tax rate, an Idaho composite tax rate, an Oregon composite tax rate, and an  
7 additional state composite tax rate. This value, as shown on line 38 of Exhibit 905,  
8 was provided by the Company's Tax Department and is included in my workpapers.

9 **Q. What is the resulting Oregon jurisdictional revenue deficiency?**

10 A. The result of the Jurisdictional Separation Study, as shown on page 1, line 39 of  
11 Exhibit 905, indicates a total revenue deficiency of \$5.8 million for the Oregon retail  
12 jurisdiction. This represents a required 14.67 percent increase in normalized Oregon  
13 jurisdictional revenues.

14 **Q. Does this conclude your testimony?**

15 A. Yes.

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Idaho Power/901  
Witness: Kelley Noe

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Kelley Noe  
Major Plant Additions Annualized for 2011

July 29, 2011



Idaho Power Company  
Major Plant Additions Annualized for 2011

Line No.	Project Type	Project ID	Description	In Service Date	(1) Annualized Plant	(2) Adjustment for Plant Est to Close 2011	(3) Net Annualizing Adjustments	(4) State	(5) Annual Composite Property Tax Rate	(6) Annual Composite Property Tax	(7) Annual Insurance Rate Per \$100	(8) Annual Insurance Expense
<b>Transmission:</b>												
<b>Stations:</b>												
1	31	TFPR0901	Kimberly Lines and Stations	June, 2011	\$ 51,321	\$ 27,634	\$ 23,687	ID	0.450%	\$ 107	\$ 0.0380	\$ 9
2	31	Total			51,321	27,634	23,687			107	0.0380	9
3	32	MPSN0802	Increase T342 to 700 MVA	June, 2011	4,179,604	2,250,556	1,929,048	ID	0.450%	8,681	0.0380	733
4	32	Total			4,179,604	2,250,556	1,929,048			8,681	0.0380	733
<b>Lines:</b>												
5	33	T4660901	Victory Lines and Stations	November, 2011	1,757,039	270,314	1,486,725	ID	0.450%	6,690	0.0380	565
6	33	T4520704	Kimberly Lines and Stations	June, 2011	1,148,666	618,512	530,154	ID	0.450%	2,386	0.0380	201
7	33	Total			2,905,705	888,826	2,016,879			9,076	0.0380	766
<b>Distribution:</b>												
<b>Substations:</b>												
8	41	VTRY0501	Victory Lines and Stations	November, 2011	2,153,531	331,312	1,822,219	ID	0.520%	9,476	0.0380	692
9		KBLY0701	Kimberly Lines and Stations	June, 2011	2,050,581	1,104,159	946,422	ID	0.520%	4,921	0.0380	360
10		BKFT0001	Replace Metalclad Switchgear Sections 1 & 2	June, 2011	2,643,335	1,423,334	1,220,001	ID	0.520%	6,344	0.0380	464
11		B00809330	AMI Communications Equipment Purchases & Installation	January, 2011	1,036,848	957,090	79,758	ID	0.520%	415	0.0380	30
12		B00809330	AMI Communications Equipment Purchases & Installation	February, 2011	841,947	712,417	129,530	ID	0.520%	674	0.0380	49
13		B00809330	AMI Communications Equipment Purchases & Installation	March, 2011	729,905	561,466	168,440	ID	0.520%	876	0.0380	64
14		B00809330	AMI Communications Equipment Purchases & Installation	April, 2011	764,002	528,925	235,078	ID	0.520%	1,222	0.0380	89
15		B00809330	AMI Communications Equipment Purchases & Installation	May, 2011	602,319	370,658	231,661	ID	0.520%	1,205	0.0380	88
16		B00809330	AMI Communications Equipment Purchases & Installation	June, 2011	791,887	426,401	365,486	ID	0.520%	1,901	0.0380	139
17		B00809330	AMI Communications Equipment Purchases & Installation	July, 2011	471,239	217,495	253,744	ID	0.520%	1,319	0.0380	96
18		B00809330	AMI Communications Equipment Purchases & Installation	August, 2011	630,287	242,418	387,869	ID	0.520%	2,017	0.0380	147
19		B00809330	AMI Communications Equipment Purchases & Installation	September, 2011	668,267	202,544	465,723	ID	0.520%	2,370	0.0380	173
20		B00809330	AMI Communications Equipment Purchases & Installation	October, 2011	709,837	163,808	546,028	ID	0.520%	2,839	0.0380	207
21		B00809330	AMI Communications Equipment Purchases & Installation	November, 2011	633,786	97,505	536,279	ID	0.520%	2,789	0.0380	204
22		B00809330	AMI Communications Equipment Purchases & Installation	December, 2011	513,530	39,502	474,028	ID	0.520%	2,465	0.0380	160
23	41	Total			15,231,300	7,379,034	7,852,266			40,832	0.0380	2,984
<b>Lines:</b>												
24	43	VTRY0601	Victory Lines and Stations	November, 2011	543,831	83,666	460,165	ID	0.520%	2,393	0.0380	175
25		KBLY0702	Kimberly Lines and Stations	June, 2011	421,283	226,845	194,438	ID	0.520%	1,011	0.0380	74
26		KBLY0703	Kimberly Lines and Stations	June, 2011	253,274	136,378	116,896	ID	0.520%	608	0.0380	44
27	43	Total			1,218,388	446,889	771,499			4,012	0.0380	293
<b>Meters:</b>												
28	1	B00600021	AMI Meter Purchases & Installations	January, 2011	2,169,705	2,002,804	166,900	ID	0.520%	868	0.0380	63
29		B00600021	AMI Meter Purchases & Installations	February, 2011	1,128,668	955,027	173,641	ID	0.520%	903	0.0380	66
30		B00600021	AMI Meter Purchases & Installations	March, 2011	1,218,542	937,340	281,202	ID	0.520%	1,462	0.0380	107
31		B00600021	AMI Meter Purchases & Installations	April, 2011	1,256,300	869,746	386,554	ID	0.520%	2,010	0.0380	147
32		B00600021	AMI Meter Purchases & Installations	May, 2011	1,217,947	749,506	468,441	ID	0.520%	2,436	0.0380	178
33		B00600021	AMI Meter Purchases & Installations	June, 2011	1,242,268	668,914	573,355	ID	0.520%	2,981	0.0380	218
34		B00600021	AMI Meter Purchases & Installations	July, 2011	1,225,095	565,401	659,694	ID	0.520%	3,430	0.0380	251
35		B00600021	AMI Meter Purchases & Installations	August, 2011	1,225,651	471,404	754,247	ID	0.520%	3,922	0.0380	287
36		B00600021	AMI Meter Purchases & Installations	September, 2011	1,263,880	388,866	874,994	ID	0.520%	4,550	0.0380	332
37		B00600021	AMI Meter Purchases & Installations	October, 2011	1,226,419	283,020	943,399	ID	0.520%	4,906	0.0380	358
38		B00600021	AMI Meter Purchases & Installations	November, 2011	343,629	52,866	290,763	ID	0.520%	1,512	0.0380	110
39		B00600021	AMI Meter Purchases & Installations	December, 2011	75,826	5,833	69,993	ID	0.520%	364	0.0380	27
40	01	Total			13,593,870	7,950,746	5,643,123			29,344	0.0380	2,144
41		Total Transmission and Distribution			37,180,186	18,943,687	18,236,501			92,051	0.0380	6,950



Idaho Power/902  
Witness: Kelley Noe

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Kelley Noe  
Depreciation and Amortization Annualizing Adjustments

July 29, 2011

**Idaho Power Company**  
**Depreciation & Amortization Annualizing Adjustments**  
**Estimated 2011**

Account	Account Description	Annualized Depreciation Expense	Forecasted Depreciation Expense	Annualizing Adjustment	Reserve Adjustment
30100	Organization				
30200	Franchises and Consents	853,176.48	853,176.48	-	-
30300	Miscellaneous Intangible Plant	6,378,354.24	6,188,898.97	189,455.27	94,727.63
<b>TOTAL</b>	<b>INTANGIBLE PLANT- AMORT</b>	<b>7,231,530.72</b>	<b>7,042,075.45</b>	<b>189,455.27</b>	<b>94,727.63</b>
31020	Land and Land Rights	8,268.36	8,268.36	-	-
31100	Structures and Improvements	2,152,401.96	2,144,648.26	7,753.70	3,876.85
31200	Boiler Plant Equipment	11,830,485.84	11,639,056.43	191,429.41	95,714.71
31400	Turbogenerator Units	3,891,755.76	3,826,824.57	64,931.19	32,465.59
31500	Accessory electric Equipment	809,497.68	810,840.18	(1,342.50)	(671.25)
31600	Misc Power Plant Equipment	506,930.28	505,200.23	1,730.05	865.02
<b>TOTAL</b>	<b>STEAM PRODUCTION PLANT</b>	<b>19,199,339.88</b>	<b>18,934,838.03</b>	<b>264,501.85</b>	<b>132,250.92</b>
33000	Land and Land Rights			-	-
33100	Structures and Improvements	4,098,214.44	4,070,470.91	27,743.53	13,871.76
33200	Reservoirs, Dams, Waterways	5,652,985.56	5,638,735.96	14,249.60	7,124.80
33300	Waterwheel, Turbines, Generato	3,698,414.28	3,690,360.72	8,053.56	4,026.78
33400	Accessory Electric Equipment	1,340,542.20	1,328,437.51	12,104.69	6,052.35
33500	Misc Power Plant Equipment	492,998.88	482,276.90	10,721.98	5,360.99
33600	Roads, Railroads and Bridges	145,321.08	145,321.08	-	-
<b>TOTAL</b>	<b>HYDRO PRODUCTION PLANT</b>	<b>15,428,476.44</b>	<b>15,355,603.08</b>	<b>72,873.36</b>	<b>36,436.68</b>
34000	LAND AND LAND RIGHTS				
34100	Structures and Improvements	221,232.60	220,768.69	463.91	231.95
34200	Fuel Holders, Producers, Acces	121,639.20	121,387.15	252.05	126.03
34300	Prime Movers	3,267,119.28	3,260,866.96	6,252.32	3,126.16
34400	Generators	946,997.52	945,040.88	1,956.64	978.32
34500	Accessory Electric Equipment	808,401.96	806,742.67	1,659.29	829.65
34600	Misc Power Plant Equipment	78,931.80	78,770.33	161.47	80.73
<b>TOTAL</b>	<b>OTHER PRODUCTION PLANT</b>	<b>5,444,322.36</b>	<b>5,433,576.68</b>	<b>10,745.68</b>	<b>5,372.84</b>
35020	Land and Land Rights	455,047.20	455,047.20 *	-	-
35200	Structures and Improvements	954,983.40	946,120.72	8,862.68	4,431.34
35300	Station Equipment	7,369,784.28	7,299,358.34	70,425.94	35,212.97
35400	Towers and Fixtures	2,940,288.36	2,878,883.18	61,405.18	30,702.59
35500	Poles and Fixtures	2,899,667.28	2,873,489.03	26,178.25	13,089.13
35600	Overhead Conductors, Devices	3,322,211.40	3,280,317.70	41,893.70	20,946.85
35900	Roads and Trails	3,132.60	3,132.60	-	-
<b>TOTAL</b>	<b>TRANSMISSION PLANT</b>	<b>17,945,114.52</b>	<b>17,736,348.77</b>	<b>208,765.75</b>	<b>104,382.88</b>
36000	Land and Land Rights				
36100	Structures and improvements	593,227.56	566,603.00	26,624.56	13,312.28
36200	Station Equipment	3,664,705.92	3,552,727.22	111,978.70	55,989.35
<b>TOTAL</b>	<b>SUBSTATION EQUIPMENT</b>	<b>4,257,933.48</b>	<b>4,119,330.22</b>	<b>138,603.26</b>	<b>69,301.63</b>
36400	Poles, Towers and Fixtures	7,653,064.92	7,521,720.04	131,344.88	65,672.44
36500	Overhead Conductors, Devices	3,677,442.12	3,608,869.64	68,572.48	34,286.24
36600	Underground Conduit	982,581.24	963,045.13	19,536.11	9,768.05
36700	Underground Conductors, Device	3,909,246.84	3,839,295.32	69,951.52	34,975.76
36800	Line Transformers	7,106,084.88	7,012,924.70	93,160.18	46,580.09
36900	Services	1,829,475.24	1,803,191.83	26,283.41	13,141.70
37000	Meters	1,024,934.76	1,029,540.33	(4,605.57)	(2,302.79)
37010	Meters - AMI	3,677,844.60	3,226,727.28	451,117.32	225,558.66
37030	Meters-Non AMI - Idaho	10,551,353.52	10,551,353.52		
37100	Installations, Cust Premises	29,256.24	28,967.40	288.84	144.42
37300	Street Lighting, Signal System	179,432.76	179,067.89	364.87	182.43
<b>TOTAL</b>	<b>DISTRIBUTION LINES</b>	<b>40,620,717.12</b>	<b>39,764,703.08</b>	<b>856,014.04</b>	<b>428,007.00</b>
38900	Land and Land Rights				
39000	Structures and Improvements	1,954,946.04	1,898,283.28	56,662.76	28,331.38
39100	Office Furniture, Equipment	7,851,477.00	7,417,941.94	433,535.06	216,767.53
39200	Transportation Equipment	2,219,319.00	2,224,286.19		3,097.09
39300	Stores Equipment	85,303.92	81,344.93	3,958.99	1,979.50
39400	Tools, Shop, Garage Equipment	283,465.32	276,174.82	7,290.50	3,645.25
39500	Laboratory Equipment	684,507.60	664,858.21	19,649.39	9,824.70
39600	Power Operated Equipment	676,137.60	681,232.72		10,005.41
39700	Communication Equipment	2,308,200.24	2,177,302.13	130,898.11	65,449.05
39800	Miscellaneous Equipment	505,034.16	483,371.42	21,662.74	10,831.37
<b>TOTAL</b>	<b>GENERAL EQUIPMENT PLANT</b>	<b>16,568,390.88</b>	<b>15,904,795.64</b>	<b>673,657.55</b>	<b>349,931.28</b>
<b>DEPR ON ELECTRIC PLANT IN SERVICE</b>		<b>119,464,294.68</b>	<b>117,249,195.50</b>	<b>2,225,161.49</b>	<b>1,125,683.23</b>
	Amortization of Disallowed Costs	(296,299.32)	(296,299.32)	-	-
<b>TOTAL DEPRECIATION &amp; AMORTIZATION</b>		<b>126,399,526.08</b>	<b>123,994,971.63</b>	<b>2,414,616.76</b>	<b>1,220,410.86</b>
	Account 312.300	(108,264.72)	(108,264.72)		
	Account 392	(1,996,903.08)	(2,001,870.27)		
	Account 396	(676,137.60)	(681,232.72)		
	Account 397.3.00	(272,780.88)	(272,780.88)		
<b>Account 403 and 404</b>		<b>123,345,439.80</b>	<b>120,930,823.04</b>		

Idaho Power/903  
Witness: Kelley Noe

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

---

Exhibit Accompanying Testimony of Kelley Noe  
Summary of Payroll-Related Annualizing Adjustments

July 29, 2011

**Idaho Power Company  
Summary of Payroll-Related Annualizing Adjustments  
Operating Expenses**

(1)

<u>Line No.</u>	<u>Source Page</u>		<u>Amount</u>
1	A	Operating Payroll - Annualizing Adjustment	\$ 1,955,023
2	A	2012 Salary Structure Adjustment	<u>2,377,859</u>
3		<b>Total Adjustments</b>	<u><u>\$4,332,883</u></u>

**Idaho Power Company**  
**Detail of Adjustments to 2011**  
**Operating Expenses**

A

Line No.	Source Page		(1)	Amount
		1) Operating Payroll (Various accts)		
1	1	Actual Total Year 2010 ST Payroll		148,290,903
2	1	Actual December 2010 ST Payroll	11,597,700	
3		Annualized December 2010 (Dec times 13)	x 13	150,770,100
4		Increase Over 2010 Actual		2,479,197
5	1	O&M Percentage		56.94%
6		Annualized December 2010 O&M ST payroll		1,411,696
7	2	Benefit Loading Percent		38.49%
8		Annualized December 2010 O&M ST w>Loading		\$ 1,955,023
		2) 2012 Operating Payroll SSA (Various accts)		
9	A	Annualized December 2011 ST Payroll		\$ 150,770,100
10		2012 Structured Salary Adjustment	2.00%	3,015,402
11	1	O&M Percentage		56.94%
12		O&M Wages Subject to Benefit Loading		1,717,020
13	2	Benefit Loading Percent		38.49%
14		Adjustment to Operating Expense		\$ 2,377,859

2010 ACTUAL for 111 - STRAIGHT TIME PAYROLL  
By Account and Month

Source Page 1

	<u>1 - O&amp;M</u>	<u>2 - Constructor</u>	<u>3 - Other</u>	<u>242 Accounts</u>	<u>Total</u>
Jan,10	5,975,138	2,317,295	619,235	2,336,499	11,248,167
Feb,10	6,886,441	2,456,548	674,713	1,247,658	11,265,360
Mar,10	6,993,988	2,668,028	783,769	873,689	11,319,474
Apr,10	10,240,878	4,085,596	1,158,527	1,549,690	17,034,691
May,10	6,740,251	2,860,903	759,472	969,453	11,330,080
Jun,10	6,378,187	2,476,442	750,529	1,748,816	11,353,974
Jul,10	6,142,794	2,626,590	714,893	1,934,182	11,418,459
Aug,10	6,449,934	2,827,369	743,320	1,425,098	11,445,720
Sep,10	6,341,582	2,757,785	689,240	1,683,077	11,471,683
Oct,10	10,076,022	4,411,723	1,119,403	1,641,380	17,248,527
Nov,10	5,898,392	2,566,563	659,597	2,432,516	11,557,068
Dec,10	6,315,709	2,918,480	741,521	1,621,990	<b>11,597,700</b>
	<b>84,439,315</b>	<b>34,973,323</b>	<b>9,414,219</b>	<b>19,464,046</b>	<b>148,290,903</b>
% of Total	<b>56.94%</b>	23.58%	6.35%	13.13%	100.00%

Annualized December ( x 13) 150,770,100

**Annualized Payroll Growth Factor 1.67%**



2010 Actual Benefits Loading %

Source Page 2

	<b>Feb-11</b>	
111 - STRAIGHT TIME PAYROL	7,131,983	
131 - INDIRECT BENEFIT LOAD	2,068,045	29.00%
140 - TAXES-EMPLOYER PAID	676,882	9.49%
<b>Subtotal loading</b>	<b>2,744,926</b>	<b>38.49%</b>

Idaho Power/904  
Witness: Kelley Noe

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

---

Exhibit Accompanying Testimony of Kelley Noe  
Development of System Revenue Requirement

July 29, 2011

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
4	<b>SUMMARY OF RESULTS</b>							
5	<b>RATE OF RETURN UNDER PRESENT RATES</b>							
6	TOTAL COMBINED RATE BASE	2,420,460,776	(26,225,097)	2,394,235,679	74,508,379	2,468,744,058	30,552,843	2,499,296,901
7								
8	OPERATING REVENUES							
9	FIRM JURISDICTIONAL SALES	873,185,400	(51,699,214)	821,486,186	30,553,596	852,039,782	0	852,039,782
10	HOKU 1ST BLOCK ENERGY SALES	27,572	0	27,572	23,953,827	23,981,399	0	23,981,399
11	SYSTEM OPPORTUNITY SALES	75,248,792	(2,518,092)	72,730,700	10,146,056	82,876,756	0	82,876,756
12	OTHER OPERATING REVENUES	84,590,356	(41,612,875)	42,977,481	1,577,757	44,555,238	0	44,555,238
13	TOTAL OPERATING REVENUES	1,033,052,120	(95,830,181)	937,221,939	66,231,236	1,003,453,175	0	1,003,453,175
14	OPERATING EXPENSES							
15	OPERATION & MAINTENANCE EXPENSES	693,221,251	(92,692,588)	600,528,663	79,892,687	680,421,350	4,344,891	684,766,241
16	DEPRECIATION EXPENSE	109,099,197	0	109,099,197	4,789,543	113,888,740	2,225,161	116,113,901
17	AMORTIZATION OF LIMITED TERM PLANT	6,355,759	478,819	6,834,578	184,774	7,019,352	189,455	7,208,808
18	TAXES OTHER THAN INCOME	24,046,036	0	24,046,036	3,454,070	27,500,107	132,419	27,632,526
19	REGULATORY DEBITS/CREDITS	21,955	0	21,955	5,802	27,757	0	27,757
20	PROVISION FOR DEFERRED INCOME TAXES	2,396,127	0	2,396,127	37,180,330	39,576,457	0	39,576,457
21	INVESTMENT TAX CREDIT ADJUSTMENT	(1,533,190)	0	(1,533,190)	(1,062,201)	(470,989)	0	(470,989)
22	FEDERAL INCOME TAXES	5,967,392	(12,896,763)	(6,929,371)	723,279	(4,863,905)	(2,260,207)	(6,924,112)
23	STATE INCOME TAXES	3,057,226	(1,934,592)	1,122,634	1,581,589	2,704,222	(434,191)	2,270,031
24	TOTAL OPERATING EXPENSES	842,631,755	(107,045,125)	735,586,630	126,749,873	866,003,091	4,197,528	870,200,619
25	OPERATING INCOME	190,420,365	11,214,944	201,635,309	(60,518,637)	137,450,084	(4,197,528)	133,252,556
26	ADD: IERCO OPERATING INCOME	7,575,497	0	7,575,497	(945,499)	6,629,998	0	6,629,998
27	CONSOLIDATED OPERATING INCOME	197,995,862	11,214,944	209,210,806	(61,464,136)	144,080,082	(4,197,528)	139,882,554
28	RATE OF RETURN UNDER PRESENT RATES	8.18%		8.74%				5.60%
29								
30	<b>DEVELOPMENT OF REVENUE REQUIREMENTS</b>							
31	RATE OF RETURN @ 10.5% ROE	8.170%	8.170%	8.170%	8.170%	8.170%	8.170%	8.170%
32								
33	RETURN	197,751,645	(2,142,590)	195,609,055	6,087,335	201,696,390	2,496,167	204,192,557
34	EARNINGS DEFICIENCY	(244,217)	(13,357,534)	(13,601,751)	67,551,470	57,616,308	6,693,695	64,310,003
35	ADD: CWIP (RELICENSING)	0	0	0	0	0	0	0
36	DEFICIENCY WITH CWIP	(244,217)	(13,357,534)	(13,601,751)	67,551,470	57,616,308	6,693,695	64,310,003
37								
38	NET-TO-GROSS TAX MULTIPLIER	1,642	1,642	1,642	1,642	1,642	1,642	1,642
39	REVENUE DEFICIENCY	(401,004)	(21,933,071)	(22,334,075)	110,919,514	94,605,977	10,991,047	105,597,024
40								
41	FIRM JURISDICTIONAL REVENUES	877,267,860	(51,699,214)	825,568,666	55,246,703	876,021,181	0	876,021,181
42	PERCENT INCREASE REQUIRED	-0.05%		-2.71%		10.80%		12.05%
43								0
44	SALES AND WHEELING REVENUES REQUIRED	876,866,876	(73,632,285)	803,234,591	166,166,217	970,627,158	10,991,047	981,618,205

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
45	<b>SUMMARY OF RESULTS</b>							
46	<b>DEVELOPMENT OF RATE BASE COMPONENTS</b>							
47	ELECTRIC PLANT IN SERVICE							
48	INTANGIBLE PLANT	53,059,662	0	53,059,662	1,461,012	54,520,675	0	54,520,675
49	PRODUCTION PLANT	1,772,638,416	0	1,772,638,416	31,557,028	1,804,195,444	11,836,052	1,816,031,496
50	TRANSMISSION PLANT	803,602,485	0	803,602,485	62,200,462	865,802,947	3,969,614	869,772,561
51	DISTRIBUTION PLANT	1,352,499,478	0	1,352,499,478	58,055,898	1,410,555,376	14,266,888	1,424,822,264
52	GENERAL PLANT	249,569,354	0	249,569,354	12,597,790	262,167,144	1,526,904	263,694,048
53	TOTAL ELECTRIC PLANT IN SERVICE	4,231,369,395	0	4,231,369,395	165,872,190	4,397,241,585	31,599,458	4,428,841,043
54	LESS: ACCUM PROVISION FOR DEPRECIATION	1,724,538,162	0	1,724,538,162	63,737,756	1,788,275,918	1,125,683	1,789,401,601
55	AMORT OF OTHER UTILITY PLANT	18,391,104	0	18,391,104	2,820,040	21,211,144	94,728	21,305,872
56	NET ELECTRIC PLANT IN SERVICE	2,488,440,130	0	2,488,440,130	99,314,393	2,587,754,523	30,379,047	2,618,133,570
57	LESS: CUSTOMER ADV FOR CONSTRUCTION	23,565,979	0	23,565,979	(6,304,446)	17,261,533	0	17,261,533
58	LESS: ACCUM DEFERRED INCOME TAXES	255,421,806	(7,112,123)	255,421,806	36,614,241	292,036,047	0	292,036,047
59	ADD.: PLT HLD FOR FUTURE+ACQUIS ADJ	7,076,146	(19,027,444)	(35,977)	22,723	(13,254)	0	(13,254)
60	ADD.: WORKING CAPITAL	112,848,202	(19,027,444)	93,820,759	5,180,347	99,001,106	173,796	99,174,902
61	ADD.: CONSERVATION+OTHER DFRD PROG.	2,156,839	0	2,156,839	146,580	2,303,419	0	2,303,419
62	ADD.: SUBSIDIARY RATE BASE	88,927,245	(85,531)	88,841,714	154,130	88,995,844	0	88,995,844
63	TOTAL COMBINED RATE BASE	2,420,460,776	(26,225,097)	2,394,235,679	74,508,379	2,468,744,058	30,552,843	2,499,296,901
64								
65	<b>DEVELOPMENT OF NET INCOME COMPONENTS</b>							
66	OPERATING REVENUES							
67	SALES REVENUES	948,461,764	(54,217,306)	894,244,458	64,653,479	958,897,937	0	958,897,937
68	OTHER OPERATING REVENUES	84,590,356	(41,612,875)	42,977,481	1,577,757	44,555,238	0	44,555,238
69	TOTAL OPERATING REVENUES	1,033,052,120	(95,830,181)	937,221,939	66,231,236	1,003,453,175	0	1,003,453,175
70	OPERATING EXPENSES			0				
71	OPERATION & MAINTENANCE EXPENSES	693,221,251	(92,692,588)	600,528,663	79,892,687	680,421,350	4,344,891	684,766,241
72	DEPRECIATION EXPENSE	109,099,197	0	109,099,197	4,789,543	113,888,740	2,225,161	116,113,901
73	AMORTIZATION OF LIMITED TERM PLANT	6,355,759	478,819	6,834,578	184,774	7,019,352	189,455	7,208,808
74	TAXES OTHER THAN INCOME	24,046,036	0	24,046,036	3,454,070	27,500,107	132,419	27,632,526
75	REGULATORY DEBITS/CREDITS	21,955	0	21,955	5,802	27,757	0	27,757
76	PROVISION FOR DEFERRED INCOME TAXES	2,396,127	0	2,396,127	37,180,330	39,576,457	0	39,576,457
77	INVESTMENT TAX CREDIT ADJUSTMENT	(1,533,190)	0	(1,533,190)	(1,062,201)	(470,989)	0	(470,989)
78	FEDERAL INCOME TAXES	5,967,392	(12,896,763)	(6,929,371)	723,279	(4,663,905)	(2,260,207)	(6,924,112)
79	STATE INCOME TAXES	3,057,226	(1,934,592)	1,122,634	1,581,589	2,704,222	(434,191)	2,270,031
80	TOTAL OPERATING EXPENSES	842,631,755	(107,045,125)	735,586,630	126,749,873	866,003,091	4,197,528	870,200,619
81	OPERATING INCOME	190,420,365	11,214,944	201,635,309	(60,518,637)	137,450,084	(4,197,528)	133,252,556
82	ADD.: IERCO OPERATING INCOME	7,575,497	0	7,575,497	(945,499)	6,629,998	0	6,629,998
83	CONSOLIDATED OPERATING INCOME	197,995,862	11,214,944	209,210,806	(61,464,136)	144,080,082	(4,197,528)	139,882,554
84								

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
107	<b>TABLE 1-ELECTRIC PLANT IN SERVICE</b>							
108	INTANGIBLE PLANT							
109	301 - ORGANIZATION	\$ (2,252)		(2,252)	7,955	5,703	0	5,703
110	302 - FRANCHISES & CONSENTS	22,744,494		22,744,494	655,660	23,400,154	0	23,400,154
111	303 - MISCELLANEOUS	30,317,420		30,317,420	797,397	31,114,818	0	31,114,818
112	TOTAL INTANGIBLE PLANT	53,059,662		53,059,662	1,461,012	54,520,675	0	54,520,675
114								
115	PRODUCTION PLANT							
116	310-316 / STEAM PRODUCTION	901,321,993		901,321,993	24,798,040	926,120,033	11,836,052	937,956,085
117	330-336 / HYDRAULIC PRODUCTION	697,307,358		697,307,358	5,503,086	702,810,444	0	702,810,444
118	340-346 / OTHER PRODUCTION	174,009,064		174,009,064	1,255,902	175,264,966	0	175,264,966
119	TOTAL PRODUCTION PLANT	1,772,638,416		1,772,638,416	31,557,028	1,804,195,444	11,836,052	1,816,031,496
121								
122	TRANSMISSION PLANT							
123	350 / LAND & LAND RIGHTS - SYSTEM SERVICE	32,831,106		32,831,106	1,297,033	34,128,139	0	34,128,139
124	TRANSMISSION RETAIL	125,006		125,006	0	125,006	0	125,006
125	DIRECT ASSIGNMENT	792		792	0	792	0	792
126	TOTAL ACCOUNT 350	32,956,904		32,956,904	1,297,033	34,253,937	0	34,253,937
127								
128	352 / STRUCTURES & IMPROVEMENTS - SYSTEM SERVICE	45,400,962		45,400,962	9,282,506	54,683,468	0	54,683,468
129	TRANSMISSION RETAIL	1,681,193		1,681,193	0	1,681,193	0	1,681,193
130	DIRECT ASSIGNMENT	658		658	0	658	0	658
131	TOTAL ACCOUNT 352	47,082,813		47,082,813	9,282,506	56,365,319	0	56,365,319
132								
133	353 / STATION EQUIPMENT - SYSTEM SERVICE	299,830,555		299,830,555	33,992,621	333,823,176	1,952,735	335,775,911
134	TRANSMISSION RETAIL	20,066,422		20,066,422	0	20,066,422	0	20,066,422
135	DIRECT ASSIGNMENT	74,044		74,044	0	74,044	0	74,044
136	TOTAL ACCOUNT 353	319,971,021		319,971,021	33,992,621	353,963,642	1,952,735	355,916,377
137								
138	354 / TOWERS & FIXTURES - SYSTEM SERVICE	139,707,686		139,707,686	7,744,478	147,452,164	0	147,452,164
139	TRANSMISSION RETAIL	0		0	0	0	0	0
140	DIRECT ASSIGNMENT	0		0	0	0	0	0
141	TOTAL ACCOUNT 354	139,707,686		139,707,686	7,744,478	147,452,164	0	147,452,164
142								
143	355 / POLES & FIXTURES - SYSTEM SERVICE	97,598,663		97,598,663	4,743,610	102,342,273	0	102,342,273
144	TRANSMISSION RETAIL	35,858		35,858	0	35,858	0	35,858
145	DIRECT ASSIGNMENT	34,064		34,064	0	34,064	0	34,064
146	TOTAL ACCOUNT 355	97,668,585		97,668,585	4,743,610	102,412,195	0	102,412,195
147								
148	356 / OVERHEAD CONDUCTORS & DEVICES - SYSTEM SERVICE	165,709,012		165,709,012	5,140,214	170,849,227	2,016,879	172,866,106
149	TRANSMISSION RETAIL	159,892		159,892	0	159,892	0	159,892
150	DIRECT ASSIGNMENT	28,221		28,221	0	28,221	0	28,221
151	TOTAL ACCOUNT 356	165,897,125		165,897,125	5,140,214	171,037,340	2,016,879	173,054,219
152								
153	359 / ROADS & TRAILS - SYSTEM SERVICE	318,351		318,351	0	318,351	0	318,351
154	TRANSMISSION RETAIL	0		0	0	0	0	0
155	DIRECT ASSIGNMENT	0		0	0	0	0	0
156	TOTAL ACCOUNT 359	318,351		318,351	0	318,351	0	318,351
157								
158	TOTAL TRANSMISSION PLANT	803,602,485		803,602,485	62,200,462	865,802,947	3,969,614	869,772,561

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
159	<b>TABLE 1-ELECTRIC PLANT IN SERVICE</b>							
160								
161	DISTRIBUTION PLANT							
162	360 / LAND & LAND RIGHTS - SYSTEM SERVICE	4,729,098		4,729,098	16,092	4,745,190	0	4,745,190
163	PLUS: ADJUSTMENT FOR CIAC	89,946		89,946	0	89,946		89,946
164	NET DISTRIBUTION PLANT + CIAC	4,819,044		4,819,044	16,092	4,835,136	0	4,835,136
165								
166	361 / STRUCTURES & IMPROVEMENTS - SYSTEM SERVICE	28,653,521		28,653,521	2,127,095	30,780,615	0	30,780,615
167	PLUS: ADJUSTMENT FOR CIAC	6,129,068		6,129,068	0	6,129,068		6,129,068
168	NET DISTRIBUTION PLANT + CIAC	34,782,589		34,782,589	2,127,095	36,909,683	0	36,909,683
169								
170	362 / STATION EQUIPMENT - SYSTEM SERVICE	182,594,168		182,594,168	5,278,691	187,872,859	7,852,266	195,725,125
171	PLUS: ADJUSTMENT FOR CIAC	24,743,557		24,743,557	0	24,743,557		24,743,557
172	NET DISTRIBUTION PLANT + CIAC	207,337,725		207,337,725	5,278,691	212,616,416	0	212,616,416
173								
174	364 / POLES, TOWERS & FIXTURES	221,160,174		221,160,174	7,985,553	229,145,727	0	229,145,727
175	365 / OVERHEAD CONDUCTORS & DEVICES	118,697,240		118,697,240	3,775,300	122,472,539	771,499	123,244,038
176	366 / UNDERGROUND CONDUIT	48,258,864		48,258,864	1,081,949	49,340,813	0	49,340,813
177	367 / UNDERGROUND CONDUCTORS & DEVICES	188,310,616		188,310,616	7,171,939	195,482,555	0	195,482,555
178	368 / LINE TRANSFORMERS	408,105,839		408,105,839	12,881,257	420,987,096	0	420,987,096
179	369 / SERVICES	57,124,593		57,124,593	1,203,475	58,328,068	0	58,328,068
180	370 / ALL OTHER METERS	13,731,087		13,731,087	1,080,164	14,811,250	0	14,811,250
181	AMI	31,753,120		31,753,120	16,573,276	48,326,396	5,643,123	53,969,519
182	PRE-AMI (OREGON)	1,269,804		1,269,804	(1,269,804)	0	0	0
183	PRE-AMI (IDAHO)	41,108,636		41,108,636	0	41,108,636	0	41,108,636
184	TOTAL ACCOUNT 370	87,862,646		87,862,646	16,383,636	104,246,282		109,889,405
185	371 / INSTALLATIONS ON CUSTOMER PREMISES	2,701,332		2,701,332	75,667	2,776,999	0	2,776,999
186	373 / STREET LIGHTING SYSTEMS	4,301,388		4,301,388	75,244	4,376,633	0	4,376,633
187								
188	TOTAL DISTRIBUTION PLANT	1,352,499,478		1,352,499,478	58,055,898	1,410,555,376	14,266,888	1,424,822,264
189								
190	GENERAL PLANT							
191	389 / LAND & LAND RIGHTS	10,936,127		10,936,127	860,545	11,796,672	0	11,796,672
192	390 / STRUCTURES & IMPROVEMENTS	77,095,507		77,095,507	4,656,559	81,752,066	1,407,279	83,159,345
193	391 / OFFICE FURNITURE & EQUIPMENT	41,977,367		41,977,367	439,753	42,417,120	38,856	42,455,976
194	392 / TRANSPORTATION EQUIPMENT	59,206,167		59,206,167	1,209,292	60,415,459	0	60,415,459
195	393 / STORES EQUIPMENT	1,462,086		1,462,086	45,535	1,507,622	0	1,507,622
196	394 / TOOLS, SHOP & GARAGE EQUIPMENT	5,315,417		5,315,417	399,320	5,714,737	0	5,714,737
197	395 / LABORATORY EQUIPMENT	11,745,366		11,745,366	569,992	12,315,358	0	12,315,358
198	396 / POWER OPERATED EQUIPMENT	9,380,965		9,380,965	415,817	9,796,782	0	9,796,782
199	397 / COMMUNICATIONS EQUIPMENT	28,105,689		28,105,689	3,284,426	31,390,116	0	31,390,116
200	398 / MISCELLANEOUS EQUIPMENT	4,344,662		4,344,662	716,550	5,061,212	80,769	5,141,981
201								
202	TOTAL GENERAL PLANT	249,569,354		249,569,354	12,597,790	262,167,144	1,526,904	263,694,048
203								
204	TOTAL ELECTRIC PLANT IN SERVICE	4,231,369,395		4,231,369,395	165,872,190	4,397,241,585	31,599,458	4,428,841,043

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
205	<b>TABLE 2-ACCUMULATED PROVISION FOR DEPRECIATION</b>							
206								
207	PRODUCTION PLANT							
208	310-316 / STEAM PRODUCTION	524,325,400		524,325,400	(4,386,362)	519,939,038	132,251	520,071,289
209	330-336 / HYDRAULIC PRODUCTION	331,327,415		331,327,415	14,042,625	345,370,039	36,437	345,406,476
210	340-346 / OTHER PRODUCTION	25,652,984		25,652,984	5,175,886	30,828,870	5,373	30,834,243
211	TOTAL PRODUCTION PLANT	881,305,799		881,305,799	14,832,149	896,137,948	174,060	896,312,008
212								
213	TRANSMISSION PLANT							
214	350 / LAND & LAND RIGHTS	5,205,369		5,205,369	448,463	5,653,832	0	5,653,832
215	352 / STRUCTURES & IMPROVEMENTS	20,240,079		20,240,079	744,746	20,984,825	4,431	20,989,256
216	353 / STATION EQUIPMENT	93,514,515		93,514,515	4,964,656	98,479,170	35,213	98,514,383
217	354 / TOWERS & FIXTURES	38,426,009		38,426,009	2,789,111	41,215,120	30,703	41,245,823
218	355 / POLES & FIXTURES	49,360,352		49,360,352	2,154,129	51,514,482	13,089	51,527,571
219	356 / OVERHEAD CONDUCTORS & DEVICES	51,017,819		51,017,819	2,549,007	53,566,827	20,947	53,587,773
220	359 / ROADS & TRAILS	255,124		255,124	3,126	258,250	0	258,250
221	TOTAL TRANSMISSION PLANT	258,019,268		258,019,268	13,653,238	271,672,506	104,383	271,776,889
222								
223	DISTRIBUTION PLANT							
224	360 / LAND & LAND RIGHTS	0		0	0	0	0	0
225	361 / STRUCTURES & IMPROVEMENTS	7,877,272		7,877,272	367,100	8,244,372	13,312	8,257,684
226	362 / STATION EQUIPMENT	43,937,278		43,937,278	917,451	44,854,729	55,989	44,910,718
227	364 / POLES, TOWERS & FIXTURES	106,774,907		106,774,907	5,631,495	112,406,402	65,672	112,472,074
228	365 / OVERHEAD CONDUCTORS & DEVICES	41,220,643		41,220,643	2,032,753	43,253,395	34,286	43,287,681
229	366 / UNDERGROUND CONDUIT	11,520,250		11,520,250	834,009	12,354,260	9,768	12,364,028
230	367 / UNDERGROUND CONDUCTORS & DEVICES	65,571,973		65,571,973	3,361,526	68,933,499	34,976	68,968,474
231	368 / LINE TRANSFORMERS	138,179,557		138,179,557	2,517,125	140,696,682	46,580	140,743,262
232	369 / SERVICES	35,836,492		35,836,492	1,406,461	37,242,953	13,142	37,256,094
233	370 / ALL OTHER METERS	4,597,152		4,597,152	905,929	5,503,081	(2,303)	5,500,778
234	AMI	2,035,440		2,035,440	2,263,546	4,298,987	225,559	4,524,545
235	PRE-AMI (OREGON)	1,151,479		1,151,479	(1,151,479)	0	0	0
236	PRE-AMI (IDAHO)	20,127,871		20,127,871	10,551,354	30,679,225	0	30,679,225
237	371 / INSTALLATIONS ON CUSTOMER PREMISES	2,318,482		2,318,482	(87,417)	2,231,065	144	2,231,210
238	373 / STREET LIGHTING SYSTEMS	3,199,915		3,199,915	112,032	3,311,947	182	3,312,129
239	TOTAL DISTRIBUTION PLANT	484,348,712		484,348,712	29,661,883	514,010,595	497,309	514,507,903
240								

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
241	<b>TABLE 2-ACCUMULATED PROVISION FOR DEPRECIATION</b>							
242								
243	GENERAL PLANT	0	0	0	0	0	0	0
244	389 / LAND & LAND RIGHTS	21,297,426		21,297,426	1,120,519	22,417,945	28,331	22,446,276
245	390 / STRUCTURES & IMPROVEMENTS	24,068,255		24,068,255	2,104,295	26,172,550	216,768	26,389,318
246	391 / OFFICE FURNITURE & EQUIPMENT	19,513,428		19,513,428	48,881	19,562,308	3,097	19,565,405
247	392 / TRANSPORTATION EQUIPMENT	503,958		503,958	35,680	539,638	1,980	541,617
248	393 / STORES EQUIPMENT	2,381,690		2,381,690	187,712	2,569,402	3,645	2,573,048
249	394 / TOOLS, SHOP & GARAGE EQUIPMENT	5,654,997		5,654,997	192,167	5,847,164	9,825	5,856,989
250	395 / LABORATORY EQUIPMENT	3,403,467		3,403,467	541,070	3,944,537	10,005	3,954,543
251	396 / POWER OPERATED EQUIPMENT	15,066,746		15,066,746	1,322,853	16,389,599	65,449	16,455,048
252	397 / COMMUNICATIONS EQUIPMENT	1,825,132		1,825,132	333,608	2,158,740	10,831	2,169,571
253	398 / MISCELLANEOUS EQUIPMENT	93,715,099		93,715,099	5,886,785	99,601,884	349,931	99,951,816
254	TOTAL GENERAL PLANT	7,149,284		7,149,284	(296,299)	6,852,985	0	6,852,985
255	AMORTIZATION OF DISALLOWED COSTS							
256								
257	TOTAL ACCUM PROVISION DEPRECIATION	1,724,538,162		1,724,538,162	63,737,756	1,788,275,918	1,125,683	1,789,401,601
258								
259	AMORTIZATION OF OTHER UTILITY PLANT							
260								
261	INTANGIBLE PLANT	5,057,847		5,057,847	854,524	5,912,370	94,728	6,007,098
262	HYDRAULIC PRODUCTION	13,333,257		13,333,257	1,965,517	15,298,774	0	15,298,774
263								
264	TOTAL AMORT OF OTHER UTILITY PLANT	18,391,104		18,391,104	2,820,040	21,211,144	94,728	21,305,872
265								
266	TOTAL ACCUM PROVISION FOR DEPR	1,742,929,265		1,742,929,265	66,557,797	1,809,487,062	1,220,411	1,810,707,473
267	& AMORTIZATION OF OTHER UTILITY PLANT							
268								



**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
269	<b>TABLE 3-ADDITIONS &amp; DEDUCTIONS TO RATEBASE</b>							
270								
271	NET ELECTRIC PLANT IN SERVICE	2,488,440,130		2,488,440,130	99,314,393	2,587,754,523	30,379,047	2,618,133,570
272	LESS:							
273	252 CUSTOMER ADVANCES FOR CONSTRUCTION							
274	POWER SUPPLY	0		0	0	0	0	0
275	OTHER	23,565,979		23,565,979	(6,304,446)	17,261,533	0	17,261,533
276	TOTAL CUSTOMER ADV FOR CONSTRUCTION	23,565,979		23,565,979	(6,304,446)	17,261,533	0	17,261,533
277								
278	ACCUMULATED DEFERRED INCOME TAXES							
279	190 / ACCUMULATED DEFERRED INCOME TAXES							
280	CUSTOMER ADVANCES FOR CONSTRUCTION	(7,698,009)		(7,698,009)	1,578,962	(6,119,047)	0	(6,119,047)
281	OTHER	(15,819,891)		(15,819,891)	(155,054)	(15,974,945)	0	(15,974,945)
282	TOTAL ACCOUNT 190	(23,517,900)		(23,517,900)	1,423,908	(22,093,992)	0	(22,093,992)
283	281 / ACCELERATED AMORTIZATION	0		0	0	0	0	0
284	282 / OTHER PROPERTY	271,043,775		271,043,775	23,532,514	294,576,289	0	294,576,289
285	283 / OTHER	7,895,931		7,895,931	11,657,819	19,553,750	0	19,553,750
286	TOTAL ACCUM DEFERRED INCOME TAXES	255,421,806		255,421,806	36,614,241	292,036,047	0	292,036,047
287								
288	NET ELECTRIC PLANT IN SERVICE	2,209,452,345		2,209,452,345	69,004,598	2,278,456,943	30,379,047	2,308,835,990
289	ADD:							
290	WORKING CAPITAL							
291	151 / FUEL INVENTORY	27,299,230	(4,409,527)	22,889,703	2,641,799	25,531,502	0	25,531,502
292	154 & 163 / PLANT MATERIALS & SUPPLIES							
293	PRODUCTION - GENERAL	14,312,232		14,312,232	(200,499)	14,111,733	0	14,111,733
294	TRANSMISSION - GENERAL	13,300,192		13,300,192	(186,322)	13,113,870	0	13,113,870
295	DISTRIBUTION - GENERAL	14,267,912		14,267,912	(199,879)	14,068,033	0	14,068,033
296	OTHER - UNCLASSIFIED	5,029,573		5,029,573	(70,459)	4,959,114	0	4,959,114
297	TOTAL ACCOUNT 154 & 163	46,909,909		46,909,909	(657,159)	46,252,750	0	46,252,750
298	165 / PREPAID ITEMS							
299	AD VALOREM TAXES	1,745,549	(1,745,549)	0	0	0	0	0
300	OTHER PROD-RELATED PREPAYMENTS	87,305	(87,305)	0	0	0	0	0
301	INSURANCE	3,297,889	(3,297,889)	0	0	0	0	0
302	PENSION EXPENSE	552,552	(552,552)	0	0	0	0	0
303	PREPAID CONTRACTS	2,898,980	(2,898,980)	0	0	0	0	0
304	MISCELLANEOUS PREPAYMENTS	2,327,938	(2,327,938)	0	0	0	0	0
305	TOTAL ACCOUNT 165	10,910,213	(10,910,213)	0	0	0	0	0
306	WORKING CASH ALLOWANCE	27,728,850	(3,707,704)	24,021,147	3,195,707	27,216,854	173,796	27,390,650
307								
308	TOTAL WORKING CAPITAL	112,848,202	(19,027,444)	93,820,759	5,180,347	99,001,106	173,796	99,174,902
309								
310	NET ELECTRIC PLANT IN SERVICE	2,322,300,547	(19,027,444)	2,303,273,103	74,184,946	2,377,458,049	30,552,843	2,408,010,892

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
311	<b>TABLE 3-ADDITIONS &amp; DEDUCTIONS TO RATEBASE</b>							
312	313 NET ELECTRIC PLANT IN SERVICE	2,322,300,547	(19,027,444)	2,303,273,103	74,184,946	2,377,458,049	30,552,843	2,408,010,892
314	ADD:							
315	105 / PLANT HELD FOR FUTURE USE							
316	HYDRAULIC PRODUCTION	112,703	(112,703)	0	0	0	0	0
317	TRANS LAND & LAND RIGHTS	915,960	(915,960)	0	0	0	0	0
318	TRANS STRUCTURES & IMPROVEMENTS	382,388	(382,388)	0	0	0	0	0
319	TRANS STATION EQUIPMENT	32,400	(32,400)	0	0	0	0	0
320	DIST LAND & LAND RIGHTS	1,540,582	(1,540,582)	0	0	0	0	0
321	DIST STRUCTURES & IMPROVEMENTS	626,395	(626,395)	0	0	0	0	0
322	GEN LAND & LAND RIGHTS	3,392,933	(3,392,933)	0	0	0	0	0
323	GEN STRUCTURES & IMPROVEMENTS	72,785	(72,785)	0	0	0	0	0
324	TRANSPORTATION EQUIPMENT	0	0	0	0	0	0	0
325	TOTAL PLANT HELD FOR FUTURE USE	7,076,146	(7,076,146)	0	0	0	0	0
326								
327	114/115 - PRAIRIE ACQUISITION ADJUSTMENT (ACCOUNT 406)	0	(35,977)	(35,977)	22,723	(13,254)	0	(13,254)
328								
329	DEFERRED PROGRAMS:							
330	182 / CONSERVATION PROGRAMS							
331	IDAHO DEFERRED CONSERVATION PROGRAMS	0	0	0	0	0	0	0
332	OREGON DEFERRED CONSERVATION PROGRAMS	0	0	0	0	0	0	0
333	TOTAL CONSERVATION PROGRAMS	0	0	0	0	0	0	0
334	182 / MISC. OTHER REGULATORY ASSETS							
335	OTHER DEFERRED	0	0	0	0	0	0	0
336	CUB FUND GRAND - (OPUC ORDER 10-406)	30,100	0	30,100	(30,100)	0	0	0
337	ZGA ARCHITECTS & PLANNERS - IPUC ORDER 30722	0	0	0	0	0	0	0
338	PENSION DEFERRAL - OPUC ORDER 10-064	939,890	0	939,890	383,271	1,323,161	0	1,323,161
339	INTERVENOR FUNDING	46,052	0	46,052	(46,052)	0	0	0
340	GRID WEST - OPUC ORDER 06-483	59,128	0	59,128	(14,191)	44,937	0	44,937
341	GRID WEST - FERC	195,524	0	195,524	(83,796)	111,728	0	111,728
342	TOTAL OTHER REGULATORY ASSETS	1,270,694	0	1,270,694	209,132	1,479,826	0	1,479,826
343	186 / MISC. OTHER DEFERRED PROGRAMS							
344	AM. FALLS BOND REFINANCING	886,145	0	886,145	(62,552)	823,593	0	823,593
345	TOTAL DEFERRED PROGRAMS	2,156,839	0	2,156,839	146,580	2,303,419	0	2,303,419
346								
347	DEVELOPMENT OF IERCO RATE BASE	0	0	0	0	0	0	0
348	INVESTMENT IN IERCO	67,582,237	(85,531)	67,496,706	7,609,643	75,106,349	0	75,106,349
349	PREPAID COAL ROYALTIES	1,464,357	0	1,464,357	(68,132)	1,396,225	0	1,396,225
350	NOTES PAYABLE TO/RECEIVABLE FROM SUBSIDIARY	19,880,651	(85,531)	19,880,651	(7,387,381)	12,493,270	0	12,493,270
351	TOTAL SUBSIDIARY RATE BASE	88,927,245	(85,531)	88,841,714	154,130	88,995,844	0	88,995,844
352								
353	TOTAL COMBINED RATE BASE	2,420,460,776	(26,225,097)	2,394,235,679	74,508,379	2,468,744,058	30,552,843	2,499,296,901

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
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	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
354	<b>TABLE 4-OPERATING REVENUES</b>							
355	FIRM ENERGY SALES & OATT REFUNDS							
356	440-448 / RETAIL	870,300,690	(51,202,226)	819,098,464	32,941,318	852,039,782	0	852,039,782
357	442 / HOKU BLOCK 1 ENERGY	27,572	0	27,572	23,953,827	23,981,399	0	23,981,399
358	447 / FIRM SALES FOR RESALE	2,894,710	(496,988)	2,387,722	(2,387,722)	0	0	0
359	447 / SYSTEM OPPORTUNITY SALES	75,248,792	(2,518,092)	72,730,700	10,146,056	82,876,756	0	82,876,756
360	447 / SYSTEM OPPORTUNITY SALES - LOSSES	0	0	0	0	0	0	0
361	TOTAL SALES OF ELECTRICITY	948,461,764	(54,217,306)	894,244,458	64,653,479	958,897,937	0	958,897,937
362								
363	OTHER OPERATING REVENUES							
364	415 / MERCHANDISING REVENUES	0	784,615	784,615	0	784,615	0	784,615
365								
366	449 / OATT TARIFF REFUND							
367	NETWORK	0	0	0	0	0	0	0
368	POINT-TO-POINT	0	0	0	0	0	0	0
369	TOTAL ACCOUNT 449	0	0	0	0	0	0	0
370								
371	451 / MISCELLANEOUS SERVICE REVENUES	3,532,832		3,532,832	0	3,532,832	0	3,532,832
372								
373	454 / RENTS FROM ELECTRIC PROPERTY							
374	SUBSTATION EQUIPMENT	9,968,654		9,968,654		9,968,654	0	9,968,654
375	TRANSFORMER RENTALS	17,330		17,330		17,330	0	17,330
376	LINE RENTALS	2,067,177		2,067,177		2,067,177	0	2,067,177
377	COGENERATION	659,903		659,903	197,439	857,342	0	857,342
378	REAL ESTATE RENTS	240,575		240,575		240,575	0	240,575
379	DARK FIBER PROJECT	448,000		448,000		448,000	0	448,000
380	POLE ATTACHMENTS	1,660,518		1,660,518		1,660,518	0	1,660,518
381	FACILITIES CHARGES	5,740,276	1,786,566	7,526,843	(1,214,027)	6,312,816	0	6,312,816
382	OTHER RENTALS	338,693		338,693		338,693	0	338,693
383	MISCELLANEOUS	0		0		0	0	0
384	TOTAL ACCOUNT 454	21,141,127	1,786,566	22,927,693	(1,016,588)	21,911,105	0	21,911,105
385								
386	456 / OTHER ELECTRIC REVENUES							
387	TRANSMISSION NETWORK SERVICES	4,054,908		4,054,908	739,280	4,794,188	0	4,794,188
388	TRANSMISSION NETWORK SERVICES - DIST FACILITIES	685,063		685,063	0	685,063	0	685,063
389	TRANSMISSION - POINT-TO-POINT & OTHER	10,658,431		10,658,431	1,799,219	12,457,650	0	12,457,650
390	PHOTOVOLTAIC STATION SERVICE	5,007		5,007		5,007	0	5,007
391	ENERGY EFFICIENCY RIDER	44,184,056	(44,184,056)	0	0	0	0	0
392	STANDBY SERVICE CHARGE	309,185		309,185	0	309,185	0	309,185
393	SIERRA PACIFIC USAGE CHARGE	(55,846)		(55,846)	55,846	(0)	0	(0)
394	ANTELOPE	73,824		73,824	0	73,824	0	73,824
395	MISCELLANEOUS	1,769		1,769		1,769	0	1,769
396	TOTAL ACCOUNT 456	59,916,397	(44,184,056)	15,732,341	2,594,345	18,326,686	0	18,326,686
397								
398	TOTAL OTHER OPERATING REVENUES	84,590,356	(41,612,875)	42,977,481	1,577,757	44,555,238	0	44,555,238
399								
400	TOTAL OPERATING REVENUES	1,033,052,120	(95,830,181)	937,221,939	66,231,236	1,003,453,175	0	1,003,453,175

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
401	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							
402	STEAM POWER GENERATION							
403	OPERATION							
404	500 / SUPERVISION & ENGINEERING	1,888,571	0	1,888,571	290,346	2,178,917	9,936	2,188,853
405	501 / FUEL	146,926,801	32,099	146,958,900	2,395,801	149,354,701	0	149,354,701
406	502 / STEAM EXPENSES							
407	LABOR	2,630,419		2,630,419		2,630,419	0	2,630,419
408	OTHER	4,707,142		4,707,142	1,280,002	5,987,144	0	5,987,144
409	TOTAL ACCOUNT 502	7,337,561		7,337,561	1,280,002	8,617,563	0	8,617,563
410	505 / ELECTRIC EXPENSES							
411	LABOR	1,173,413		1,173,413		1,173,413	0	1,173,413
412	OTHER	966,780		966,780	373,346	1,340,126	0	1,340,126
413	TOTAL ACCOUNT 505	2,140,193		2,140,193	373,346	2,513,539	0	2,513,539
414	506 / MISCELLANEOUS EXPENSES	9,797,766	(64,325)	9,733,431	1,705,192	11,438,623	1,021	11,439,644
415	507 / RENTS	229,316		229,316	40,002	269,318	0	269,318
416	STEAM OPERATION EXPENSES	168,320,198	(32,226)	168,287,972	6,084,689	174,372,661	10,957	174,383,618
417								
418	MAINTENANCE							
419	510 / SUPERVISION & ENGINEERING	2,292,767		2,292,767	399,962	2,692,729	0	2,692,729
420	511 / STRUCTURES	309,374		309,374	53,969	363,343	0	363,343
421	512 / BOILER PLANT							
422	LABOR	6,236,518		6,236,518		6,236,518	0	6,236,518
423	OTHER	9,831,314		9,831,314	2,802,957	12,634,271	0	12,634,271
424	TOTAL ACCOUNT 512	16,067,832		16,067,832	2,802,957	18,870,789	0	18,870,789
425	513 / ELECTRIC PLANT							
426	LABOR	1,993,219		1,993,219		1,993,219	0	1,993,219
427	OTHER	1,922,071		1,922,071	683,005	2,605,076	0	2,605,076
428	TOTAL ACCOUNT 513	3,915,290		3,915,290	683,005	4,598,295	0	4,598,295
429	514 / MISCELLANEOUS STEAM PLANT	3,753,015		3,753,015	654,696	4,407,711	0	4,407,711
430	STEAM MAINTENANCE EXPENSES	26,338,278	0	26,338,278	4,594,589	30,932,867	0	30,932,867
431	TOTAL STEAM GENERATION EXPENSES	194,688,476	(32,226)	194,626,250	10,679,278	205,305,528	10,957	205,316,485
432								

**IDAHO POWER COMPANY  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
3	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							
433	HYDRAULIC POWER GENERATION							
434	OPERATION							
435	535 / SUPERVISION & ENGINEERING	5,362,099	(66)	5,362,033	190,700	5,552,733	163,743	5,716,476
436	536 / WATER FOR POWER	7,322,751	(22)	7,322,729	243,349	7,566,078	22,062	7,588,140
437	537 / HYDRAULIC EXPENSES	10,671,807	(2,500)	10,669,307	1,099,261	11,768,568	184,740	11,953,308
438	538 / ELECTRIC EXPENSES							
439	LABOR	1,133,916		1,133,916		1,133,916	44,866	1,178,782
440	OTHER	431,926		431,926	55,419	487,345	0	487,345
441	TOTAL ACCOUNT 538	1,565,842		1,565,842	55,419	1,621,261	44,866	1,666,127
442	539 / MISCELLANEOUS EXPENSES	2,895,723	(351)	2,895,372	101,775	2,997,147	74,311	3,071,458
443	540 / RENTS	406,432		406,432	13,404	419,836	0	419,836
444	HYDRAULIC OPERATION EXPENSES	28,224,654	(2,939)	28,221,715	1,703,908	29,925,623	489,722	30,415,345
445								
446								
447	MAINTENANCE							
448	541 / SUPERVISION & ENGINEERING	1,967,876		1,967,876	70,356	2,038,232	64,589	2,102,821
449	542 / STRUCTURES	1,155,653		1,155,653	40,462	1,196,115	28,310	1,224,425
450	543 / RESERVOIRS, DAMS & WATERWAYS	1,368,191		1,368,191	47,243	1,415,434	25,016	1,440,450
451	544 / ELECTRIC PLANT							
452	LABOR	1,989,149		1,989,149		1,989,149	78,705	2,067,854
453	OTHER	1,188,662		1,188,662	111,429	1,300,091	0	1,300,091
454	TOTAL ACCOUNT 544	3,177,811		3,177,811	111,429	3,289,240	78,705	3,367,945
455	545 / MISCELLANEOUS HYDRAULIC PLANT	3,029,473		3,029,473	106,310	3,135,783	76,527	3,212,310
456	HYDRAULIC MAINTENANCE EXPENSES	10,699,004	0	10,699,004	375,800	11,074,804	273,146	11,347,950
457	TOTAL HYDRAULIC GENERATION EXPENSES	38,923,658	(2,939)	38,920,719	2,079,708	41,000,427	762,868	41,763,295

**IDAHO POWER COMPANY  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
458	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							0
459	OTHER POWER GENERATION							
460	OPERATION							
461	546 / SUPERVISION & ENGINEERING	328,417		328,417	11,785	340,202	11,348	351,550
462	547 / FUEL							
463	DIESEL FUEL	14,672		14,672		14,672	0	14,672
464	OTHER	12,731,280	(7,549,380)	5,181,900	(223,335)	4,958,565	0	4,958,565
465	TOTAL ACCOUNT 547	12,745,952	(7,549,380)	5,196,572	(223,335)	4,973,237	0	4,973,237
466	548 / GENERATING EXPENSES							
467	LABOR	0		0		0	12,967	12,967
468	OTHER	448,744		448,744	15,888	464,632	0	464,632
469	TOTAL ACCOUNT 548	448,744		448,744	15,888	464,632	12,967	477,599
470	549 / MISCELLANEOUS EXPENSES	450,180		450,180	15,911	466,091	12,784	478,875
471	550 / RENTS	0		0		0	0	0
472	OTHER POWER OPER EXPENSES	13,973,293	(7,549,380)	6,423,913	(179,751)	6,244,162	37,099	6,281,261
473								
474	MAINTENANCE							
475	551 / SUPERVISION & ENGINEERING	43		43	1	44	0	44
476	552 / STRUCTURES	182,043		182,043	6,433	188,476	5,060	193,536
477	553 / GENERATING & ELECTRIC PLANT			0		0		
478	LABOR	0		0		0	3,509	3,509
479	OTHER	118,533	0	118,533	4,209	122,742	0	122,742
480	TOTAL ACCOUNT 553	118,533	0	118,533	4,209	122,742	3,509	126,251
481	554 / MISCELLANEOUS EXPENSES	1,077,264		1,077,264	1,294,436	2,371,700	14,054	2,385,754
482	OTHER POWER MAINT EXPENSES	1,377,883	0	1,377,883	1,305,079	2,682,962	22,623	2,705,585
483	TOTAL OTHER POWER GENERATION EXP	15,351,176	(7,549,380)	7,801,796	1,125,328	8,927,124	59,722	8,986,846
484								
485	OTHER POWER SUPPLY EXPENSE							
486	555.0 / PURCHASED POWER							
487	POWER EXPENSE	81,871,679	(28,651,579)	53,220,100	17,740,613	70,960,713	0	70,960,713
488	TRANSMISSION LOSSES	1,006,538	0	1,006,538	359,462	1,366,000	0	1,366,000
489	TOTAL 555.0/PURCHASED POWER	82,878,217	(28,651,579)	54,226,638	18,100,075	72,326,713	0	72,326,713
490	555.1 / COGENERATION & SMALL POWER PROD			0		0		
491	CAPACITY RELATED	2,815,124	(2,815,124)	0	0	0	0	0
492	ENERGY RELATED	52,156,994	58,197,321	110,354,316	18,696,906	129,051,222	0	129,051,222
493	TOTAL 555.1/CSPP	54,972,118	55,382,198	110,354,316	18,696,906	129,051,222	0	129,051,222
494	555/TOTAL	137,850,335	26,730,619	164,580,954	36,796,981	201,377,935	0	201,377,935
495	556 / LOAD CONTROL & DISPATCHING EXPENSES	160		160	5	165	0	165
496	557 / OTHER EXPENSES							
497	PCA/EPC ACCOUNTS	51,225,683	(51,225,683)	0	0	0	0	0
498	OTHER	2,569,334		2,569,334	91,215	2,660,549	77,912	2,738,461
499	557/TOTAL	53,795,017	(51,225,683)	2,569,334	91,215	2,660,549	77,912	2,738,461
500	TOTAL OTHER POWER SUPPLY EXPENSES	191,645,512	(24,495,064)	167,150,448	36,888,201	204,038,649	77,912	204,116,561
1	TOTAL PRODUCTION EXPENSES	440,578,822	(32,079,609)	408,499,213	50,772,515	459,271,728	911,459	460,183,187

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
2	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							
3	TRANSMISSION EXPENSES			0		0		
4	OPERATION			0		0		
5	560 / SUPERVISION & ENGINEERING	2,992,955	(130)	2,992,825	104,884	3,097,709	74,228	3,171,937
6	561 / LOAD DISPATCHING	2,953,094	(76)	2,953,018	105,999	3,059,017	103,127	3,162,144
7	562 / STATION EXPENSES	1,987,214		1,987,214	70,228	2,057,442	55,632	2,113,074
8	563 / OVERHEAD LINE EXPENSES	660,035		660,035	2,386,852	3,046,887	12,886	3,059,773
9	565 / TRANSMISSION OF ELECTRICITY BY OTHERS	5,918,507		5,918,507	2,060,093	7,978,600	0	7,978,600
10	566 / MISCELLANEOUS EXPENSES	336,835		336,835	11,205	348,040	1,179	349,219
11	567 / RENTS	1,569,168		1,569,168	612,921	2,182,089	0	2,182,089
12	TOTAL TRANSMISSION OPERATION	16,417,808	(206)	16,417,602	5,352,183	21,769,785	247,052	22,016,837
13								
14	MAINTENANCE							
15	568 / SUPERVISION & ENGINEERING	540,340		540,340	18,248	558,588	5,065	563,653
16	569 / STRUCTURES	419,219		419,219	14,897	434,116	12,604	446,720
17	570 / STATION EQUIPMENT	3,447,662	(9)	3,447,653	120,091	3,567,744	76,698	3,644,442
18	571 / OVERHEAD LINES	2,781,256	(11)	2,781,245	94,398	2,875,643	33,042	2,908,685
19	573 / MISCELLANEOUS PLANT	(40)		(40)	(2)	(42)	0	(42)
20	TOTAL TRANSMISSION MAINTENANCE	7,188,437	(20)	7,188,417	247,632	7,436,049	127,409	7,563,458
21								
22	TOTAL TRANSMISSION EXPENSES	23,606,245	(226)	23,606,019	5,599,815	29,205,834	374,461	29,580,295

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
23	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							
24	DISTRIBUTION EXPENSES							
25	OPERATION							
26	580 / SUPERVISION & ENGINEERING	3,713,391	(1,162)	3,712,229	132,086	3,844,315	111,849	3,956,164
27	581 / LOAD DISPATCHING	3,419,960		3,419,960	122,808	3,542,768	116,327	3,659,095
28	582 / STATION EXPENSES	1,277,818	(100)	1,277,718	44,913	1,322,631	33,282	1,355,913
29	583 / OVERHEAD LINE EXPENSES	3,029,340	(74)	3,029,266	107,642	3,136,908	97,101	3,234,009
30	584 / UNDERGROUND LINE EXPENSES	1,792,342	(71)	1,792,271	61,166	1,853,437	25,348	1,878,785
31	585 / STREET LIGHTING & SIGNAL SYSTEMS	79,537		79,537	2,780	82,317	2,496	84,813
32	586 / METER EXPENSES	4,219,271	(35)	4,219,236	25,493	4,244,729	0	4,244,729
33	587 / CUSTOMER INSTALLATIONS EXPENSE	1,521,427	(55)	1,521,372	53,651	1,575,023	41,458	1,616,481
34	588 / MISCELLANEOUS EXPENSES	5,004,179	(605)	5,003,574	175,396	5,178,970	122,370	5,301,340
35	589 / RENTS	440,787		440,787	150,324	591,111	4	591,115
36	TOTAL DISTRIBUTION OPERATION	24,498,052	(2,102)	24,495,950	876,259	25,372,209	550,235	25,922,444
37								
38	MAINTENANCE							
39	590 / SUPERVISION & ENGINEERING	371,979		371,979	13,294	385,273	12,016	397,289
40	591 / STRUCTURES	(11,385)		(11,385)	(376)	(11,761)	0	(11,761)
41	592 / STATION EQUIPMENT	3,774,723	(113)	3,774,610	131,767	3,906,377	86,662	3,993,039
42	593 / OVERHEAD LINES	14,297,636	(7,433)	14,290,203	489,037	14,779,240	202,962	14,982,202
43	594 / UNDERGROUND LINES	1,003,404		1,003,404	35,257	1,038,661	25,533	1,064,194
44	595 / LINE TRANSFORMERS	448,157		448,157	14,863	463,020	982	464,002
45	596 / STREET LIGHTING & SIGNAL SYSTEMS	587,953		587,953	20,401	608,354	12,945	621,299
46	597 / METERS	700,080		700,080	3,933	704,013	0	704,013
47	598 / MISCELLANEOUS PLANT	137,583		137,583	4,833	142,416	4,239	146,655
48	TOTAL DISTRIBUTION MAINTENANCE	21,310,130	(7,546)	21,302,584	713,009	22,015,593	345,339	22,360,932
49	TOTAL DISTRIBUTION EXPENSES	45,808,182	(9,648)	45,798,534	1,589,268	47,387,802	895,574	48,283,376
50								
51	CUSTOMER ACCOUNTING EXPENSES							
52	901 / SUPERVISION	410,702	(103)	410,599	14,722	425,321	14,229	439,550
53	902 / METER READING	4,026,937		4,026,937	(1,833,435)	2,193,502	0	2,193,502
54	903 / CUSTOMER RECORDS & COLLECTIONS	12,988,730	(69)	12,988,661	450,982	13,439,643	273,279	13,712,922
55	904 / UNCOLLECTIBLE ACCOUNTS	4,638,855		4,638,855	0	4,638,855	0	4,638,855
56	905 / MISC EXPENSES	342		342	12	354	0	354
57	TOTAL CUSTOMER ACCOUNTING EXPENSES	22,065,566	(172)	22,065,394	(1,367,719)	20,697,675	287,508	20,985,183
58								
59	CUSTOMER SERVICES & INFORMATION EXPENSES							
60	907 / SUPERVISION	352,778		352,778	12,606	365,140	11,052	376,192
61	908 / CUSTOMER ASSISTANCE		(244)					
62	SYSTEM CONSERVATION	333,928		333,928		333,928	0	333,928
63	OTHER	51,625,921	(44,187,183)	7,438,738	(1,352,887)	6,085,851	143,730	6,229,581
64	TOTAL ACCOUNT 908	51,959,849	(44,187,183)	7,772,666	(1,352,887)	6,419,779	143,730	6,563,509
65	909 / INFORMATION & INSTRUCTIONAL	31,517		31,517	1,040	32,557	0	32,557
66	910 / MISCELLANEOUS EXPENSES	864,003	(329)	863,674	30,207	893,881	20,117	913,998
67	TOTAL CUST SERV & INFORMATN EXPENSES	53,208,147	(44,187,756)	9,020,391	(1,309,034)	7,711,357	174,898	7,886,255



**IDAHO POWER COMPANY  
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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
68	<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>							
69	ADMINISTRATIVE & GENERAL EXPENSES							
70	920 / ADMINISTRATIVE & GENERAL SALARIES	63,660,597	(16,398,928)	47,261,669	8,384,695	55,646,364	1,618,018	57,264,382
71	921 / OFFICE SUPPLIES	13,613,991	(17,258)	13,596,733	1,300,867	14,897,600	7,681	14,905,281
72	922 / ADMIN & GENERAL EXPENSES TRANSFERRED-CR	(27,799,634)		(27,799,634)	(998,665)	(28,798,299)	0	(28,798,299)
73	923 / OUTSIDE SERVICES	7,210,630	(7,395)	7,203,235	237,808	7,441,043	0	7,441,043
74	924 / PROPERTY INSURANCE					0		0
75	PRODUCTION - STEAM	809,837		809,837		809,837	0	809,837
76	ALL RISK & MISCELLANEOUS	2,519,740		2,519,740	5,031	2,524,771	21,166	2,545,937
77	TOTAL ACCOUNT 924	3,329,577		3,329,577	5,031	3,334,608	21,166	3,355,774
78	925 / INJURIES & DAMAGES	5,668,380		5,668,380	187,461	5,855,841	6,440	5,862,281
79	926 / EMPLOYEE PENSIONS & BENEFITS	25,926,077	(1,027)	25,925,050	618,379	26,543,429	0	26,543,429
80	EMPLOYEE PENSIONS & BENEFITS - OREGON	884,236		884,236	8,788	893,024	0	893,024
81	EMPLOYEE PENSIONS & BENEFITS - IDAHO	3,159,800		3,159,800	13,993,913	17,153,713	0	17,153,713
82	EMPLOYEE PENSIONS & BENEFITS - FERC	60,986		60,986	129,964	190,950	0	190,950
83	927 / FRANCHISE REQUIREMENTS	2,549		2,549	84	2,633	0	2,633
84	928 / REGULATORY COMMISSION EXPENSES							
85	928.101 / FERC ADMIN ASSESS & SECURITIES							
86	CAPACITY RELATED	1,661,164		1,661,164	131,221	1,792,385	0	1,792,385
87	ENERGY RELATED	706,272		706,272	55,791	762,063	0	762,063
88	928.101 / FERC ORDER 472	466,188		466,188	36,825	503,013	0	503,013
89	928.101 / FERC MISCELLANEOUS	539,362		539,362	42,607	581,969	0	581,969
90	928.102 FERC RATE CASE	704		704	23	727	0	727
91	928.104 / FERC OREGON HYDRO	158,506		158,506	5,227	163,733	0	163,733
92	928.202 / IDAHO PUC - RATE CASE	1,024		1,024	54,349	55,373	0	55,373
93	928.203 / IDAHO PUC - OTHER	31,419	(5,748)	25,671	42,077	67,448	0	67,448
94	928.301 / OREGON PUC - FILING FEES	0		0		0	0	0
95	928.302 / OREGON PUC - RATE CASE	6,532		6,532	216	6,748	0	6,748
96	928.303 / OREGON PUC - OTHER	226,666		226,666	72,596	299,262	0	299,262
97	IPC/PUC JSS TRUE-UP ADJ	0		0		0	0	0
98	TOTAL ACCOUNT 928	3,797,837	(5,748)	3,792,089	440,932	4,233,021	0	4,233,021
99	929 / DUPLICATE CHARGES	0		0		0	0	0
100	930.1 / GENERAL ADVERTISING	417,950	(417,950)	0	0	0	0	0
101	930.2 / MISCELLANEOUS EXPENSES	3,826,102	(181,010)	3,645,092	140,403	3,785,495	5,253	3,790,748
102	931 / RENTS	12,600		12,600	12,588	25,188	0	25,188
103	TOTAL ADM & GEN OPERATION	103,771,678	(17,029,316)	86,742,362	24,462,249	111,204,611	1,658,560	112,863,171
104	PLUS:					0		0
105	935 / GENERAL PLANT MAINTENANCE	4,182,611	(16)	4,182,595	145,593	4,328,188	42,431	4,370,619
106	416 / MERCHANDISING EXPENSE	0	614,155	614,155	0	614,155	0	614,155
107	TOTAL OPER & MAINT EXPENSES	693,221,251	(92,692,588)	600,528,663	79,892,687	680,421,350	4,344,891	684,766,241

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
108	<b>TABLE 6-DEPRECIATION &amp; AMORTIZATION EXPENSE</b>							
109								
110	DEPRECIATION EXPENSE							
111	310-316 / STEAM / PRODUCTION	18,372,191		18,372,191	454,375	18,826,566	264,502	19,091,068
112	330-336 / HYDRAULIC PRODUCTION	15,364,474		15,364,474	(8,871)	15,355,603	72,873	15,428,476
113	340-346 / OTHER PRODUCTION	4,940,258		4,940,258	493,319	5,433,577	10,746	5,444,322
114	TOTAL PRODUCTION PLANT	38,676,923		38,676,923	938,824	39,615,746	348,121	39,963,867
115								
116	TRANSMISSION PLANT							
117	350 / LAND & LAND RIGHTS	433,529		433,529	21,518	455,047	0	455,047
118	352 / STRUCTURES & IMPROVEMENTS	772,335		772,335	173,785	946,121	8,863	954,983
119	353 / STATION EQUIPMENT	6,540,842		6,540,842	758,516	7,299,358	70,426	7,369,784
120	354 / TOWERS & FIXTURES	2,730,078		2,730,078	148,805	2,878,883	61,405	2,940,288
121	355 / POLES & FIXTURES	2,735,230		2,735,230	138,259	2,873,489	26,178	2,899,667
122	356 / OVERHEAD CONDUCTORS & DEVICES	3,179,985		3,179,985	100,323	3,280,318	41,894	3,322,211
123	359 / ROADS & TRAILS	3,120		3,120	13	3,133	0	3,133
124	TOTAL TRANSMISSION PLANT	16,395,129		16,395,129	1,341,219	17,736,349	208,766	17,945,115
125								
126	DISTRIBUTION PLANT							
127	360 / LAND & LAND RIGHTS	0		0	0	0	0	0
128	361 / STRUCTURES & IMPROVEMENTS	529,734		529,734	36,869	566,603	26,625	593,228
129	362 / STATION EQUIPMENT	3,451,030		3,451,030	101,697	3,552,727	111,979	3,664,706
130	364 / POLES, TOWERS & FIXTURES	7,265,471		7,265,471	256,249	7,521,720	131,345	7,653,065
131	365 / OVERHEAD CONDUCTORS & DEVICES	3,498,030		3,498,030	110,840	3,608,870	68,572	3,677,442
132	366 / UNDERGROUND CONDUIT	941,119		941,119	21,927	963,045	19,536	982,581
133	367 / UNDERGROUND CONDUCTORS & DEVICES	3,704,492		3,704,492	134,803	3,839,295	69,952	3,909,247
134	368 / LINE TRANSFORMERS	6,806,033		6,806,033	206,891	7,012,925	93,160	7,106,085
135	369 / SERVICES	1,764,643		1,764,643	38,549	1,803,192	26,283	1,829,475
136	370 / ALL OTHER METERS	991,179		991,179	38,361	1,029,540	(4,606)	1,024,935
137	AMI	2,101,632		2,101,632	1,125,095	3,226,727	451,117	3,677,845
138	PRE-AMI (OREGON)	439,567		439,567	(439,567)	0	0	0
139	PRE-AMI (IDAHO)	10,551,354		10,551,354	0	10,551,354	0	10,551,354
140	371 / INSTALLATIONS ON CUSTOMER PREMISES	18,535		18,535	10,433	28,967	289	29,256
141	373 / STREET LIGHTING SYSTEMS	175,691		175,691	3,377	179,068	365	179,433
142	TOTAL DISTRIBUTION PLANT	42,238,509		42,238,509	1,645,524	43,884,033	994,617	44,878,651

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
143	<b>TABLE 6-DEPRECIATION &amp; AMORTIZATION EXPENSE</b>							
144								
145	GENERAL PLANT	0				0	0	0
146	389 / LAND & LAND RIGHTS	1,798,012		1,798,012	100,272	1,898,283	56,663	1,954,946
147	390 / STRUCTURES & IMPROVEMENTS	6,975,480		6,975,480	442,462	7,417,942	433,535	7,851,477
148	391 / OFFICE FURNITURE & EQUIPMENT	227,309		227,309	(4,894)	222,415	0	222,415
149	392 / TRANSPORTATION EQUIPMENT	65,623		65,623	15,722	81,345	3,969	85,304
150	393 / STORES EQUIPMENT	227,325		227,325	48,850	276,175	7,291	283,465
151	394 / TOOLS, SHOP & GARAGE EQUIPMENT	570,437		570,437	94,421	664,858	19,649	684,508
152	395 / LABORATORY EQUIPMENT	104,001		104,001	(104,001)	0	0	0
153	396 / POWER OPERATED EQUIPMENT	1,704,298		1,704,298	200,223	1,904,521	130,898	2,035,419
154	397 / COMMUNICATIONS EQUIPMENT	412,451		412,451	70,920	483,371	21,663	505,034
155	398 / MISCELLANEOUS EQUIPMENT	12,084,935		12,084,935	863,976	12,948,911	673,658	13,622,568
156	TOTAL GENERAL PLANT	109,395,496		109,395,496	4,789,543	114,185,039	2,225,161	116,410,200
157	TOTAL DEPRECIATION EXPENSE	(296,299)		(296,299)	0	(296,299)	0	(296,299)
158	DEPRECIATION ON DISALLOWED COSTS	109,099,197		109,099,197	4,789,543	113,888,740	2,225,161	116,113,901
159	TOTAL DEPRECIATION EXPENSE	6,857,301		6,857,301	184,774	7,042,075	189,455	7,231,531
160	AMORTIZATION EXPENSE	0		0	0	0	0	0
161	INTANGIBLE PLANT	(501,542)		(22,723)	0	(22,723)	0	(22,723)
162	HYDRAULIC PRODUCTION	6,355,759		6,834,578	184,774	7,019,352	189,455	7,208,808
163	ADJUSTMENTS, GAINS & LOSSES	115,454,956		115,933,775	4,974,317	120,908,092	2,414,617	123,322,709
164	TOTAL AMORTIZATION EXPENSE	115,454,956		115,933,775	4,974,317	120,908,092	2,414,617	123,322,709
165	TOTAL DEPRECIATION & AMORTIZATION EXP							

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	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
170	<b>TABLE 7-TAXES OTHER THAN INCOME TAXES</b>							
171	TAXES OTHER THAN INCOME							
172	FEDERAL TAXES							
173	SOCIAL SECURITY	12,457,819	(12,457,819)	0	0	0		0
174	UNEMPLOYMENT	120,285	(120,285)	0	0	0		0
175	LESS PAYROLL DEDUCTION	(13,686,350)	13,686,350	0	0	0		0
176								
177	STATE TAXES							
178	AD VALOREM TAXES							
179	JIM BRIDGER STATION	1,194,866		1,194,866	217,681	1,412,547		1,412,547
180	VALMY	1,084,300		1,084,300	197,538	1,281,838		1,281,838
181	BOARDMAN	260,775		260,775	47,508	308,283		308,283
182	OTHER-PRODUCTION PLANT	4,467,955		4,467,955	133,285	4,601,240	32,428	4,633,668
183	OTHER-TRANSMISSION PLANT	3,842,054		3,842,054	1,543,998	5,386,052	17,864	5,403,916
184	OTHER-DISTRIBUTION PLANT	7,640,112		7,640,112	813,702	8,453,814	74,188	8,528,002
185	OTHER-GENERAL PLANT	1,263,031		1,263,031	93,556	1,356,587	7,939	1,364,526
186	SUB-TOTAL	19,753,093		19,753,093	3,047,271	22,800,364	132,419	22,932,783
187								
188	LICENSES - HYDRO PROJECTS	4,250		4,250	580	4,830		4,830
189								
190	REGULATORY COMMISSION FEES							
191	STATE OF IDAHO	1,837,184		1,837,184	0	1,837,184		1,837,184
192	STATE OF OREGON	92,603		92,603	48,339	140,942		140,942
193	STATE OF NEVADA	0		0	0	0		0
194								
195	FRANCHISE TAXES							
196	STATE OF OREGON	713,129		713,129	(32,970)	680,159		680,159
197	STATE OF NEVADA	0		0	0	0		0
198								
199	OTHER STATE TAXES							
200	UNEMPLOYMENT TAXES	1,108,246	(1,108,246)	0	0	0		0
201	HYDRO GENERATION KWH TAX	1,415,000		1,415,000	317,697	1,732,697		1,732,697
202	IRRIGATION-PIC	230,778		230,778	73,153	303,932		303,932
203								
204	TOTAL TAXES OTHER THAN INCOME	24,046,036	0	24,046,036	3,454,070	27,500,107	132,419	27,632,526
205								

**IDAHO POWER COMPANY  
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1	2	3	4	5	6	7	8	9
	<u>Description</u>	<u>2010 Actual</u>	<u>2010 Actual Adjustments</u>	<u>2010 Base</u>	<u>Forecast Adjustment</u>	<u>2011 Unadjusted Test Year</u>	<u>Annualizing Adjustment</u>	<u>2011 Test Year</u>
206	<b>TABLE 8-REGULATORY DEBITS &amp; CREDITS</b>							
207	REGULATORY DEBITS/CREDITS							
208	STATE OF IDAHO	0		0	0	0		0
209	STATE OF OREGON	21,955		21,955	5,802	27,757		27,757
210								
211	TOTAL REGULATORY DEBITS/CREDITS	21,955	0	21,955	5,802	27,757		27,757
212								
213								

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
214	<b>TABLE 9-INCOME TAXES</b>							
215								
216	410/411 NET PROVISION FOR DEFERRED INCOME TAXES							
217	ACCOUNT #282 - RELATED	2,760,109	0	2,760,109	42,563,457	45,323,566	0	45,323,566
218	ACCOUNT #190 & #283 - RELATED	(363,981)	0	(363,981)	(5,383,128)	(5,747,109)	0	(5,747,109)
219	TOTAL NET PROVISION FOR DEFERRED INCOME TAXES	2,396,127	0	2,396,127	37,180,330	39,576,457	0	39,576,457
220								
221	411.4 - INVESTMENT TAX CREDIT ADJUSTMENT	(1,533,190)	0	(1,533,190)	(1,062,201)	(470,989)	0	(470,989)
222								
223	SUMMARY OF INCOME TAXES							
224								
225	TOTAL FEDERAL INCOME TAX	5,967,392	(12,896,763)	(6,929,371)	723,279	(4,863,905)	(2,260,207)	(6,924,112)
226								
227	STATE INCOME TAX							
228	STATE OF IDAHO	2,763,053	(1,819,716)	943,336	1,809,399	2,752,735	(406,624)	2,346,112
229	STATE OF OREGON	292,924	(92,528)	200,396	(248,487)	(48,092)	(20,676)	(68,768)
230	OTHER STATES	1,250	(22,348)	(21,098)	20,677	(421)	(6,892)	(7,313)
231	TOTAL STATE INCOME TAXES	3,057,226	(1,934,592)	1,122,634	1,581,589	2,704,222	(434,191)	2,270,031

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
232	<b>TABLE 10-CALCULATION OF FEDERAL INCOME TAX</b>							
233	OPERATING REVENUES	1,033,052,120	(95,830,181)	937,221,939	66,231,236	1,003,453,175	0	1,003,453,175
234						0		
235	OPERATING EXPENSES							
236	OPERATION & MAINTENANCE	693,221,251	(92,692,588)	600,528,663	79,892,687	680,421,350	4,344,891	684,766,241
237	DEPRECIATION EXPENSE	109,099,197	0	109,099,197	4,789,543	113,888,740	2,225,161	116,113,901
238	AMORTIZATION OF LIMITED TERM PLANT	6,355,759	478,819	6,834,578	184,774	7,019,352	189,455	7,208,808
239	TAXES OTHER THAN INCOME	24,046,036	0	24,046,036	3,454,070	27,500,107	132,419	27,632,526
240	REGULATORY DEBITS/CREDITS	21,955	0	21,955	5,802	27,757	0	27,757
241	TOTAL OPERATING EXPENSES	832,744,199	(92,213,769)	740,530,429	88,326,876	828,857,305	6,891,926	835,749,232
242								
243	BOOK-TAX ADJUSTMENT	0	0	0	0	0	0	0
244								
245	INCOME BEFORE TAX ADJUSTMENTS	200,307,921	(3,616,412)	196,691,509	(22,095,640)	174,595,870	(6,891,926)	167,703,943
246								
247	INCOME STATEMENT ADJUSTMENTS							
248	INTEREST EXPENSE / SYNCHRONIZATION	84,600,361	0	84,600,361	(85,445)	84,514,916	0	84,514,916
249								
250	NET OPERATING INCOME BEFORE TAXES	115,707,560	(3,616,412)	112,091,148	(22,010,195)	90,080,954	(6,891,926)	83,189,027
251								
252	ALLOWANCE FOR AFUDC	27,226,240	(27,226,240)	0	0	0	0	0
253	FEDERAL INCOME TAX ADJUSTMENTS - PLANT	(104,566,571)	0	(104,566,571)	(11,731,411)	(116,297,982)	0	(116,297,982)
254	FEDERAL INCOME TAX ADJUSTMENTS - OTHER	(34,722,436)	0	(34,722,436)	45,911,996	15,595,809	0	15,595,809
255								
256	NET OPER INCOME BEFORE STATE INCOME TAXES	3,644,793	(30,842,652)	(27,197,859)	12,170,390	(10,621,219)	(6,891,926)	(17,513,146)
257								
258	TOTAL STATE INCOME TAXES (ALLOWED)	5,563,678	6,005,244	11,568,922	(8,864,699)	2,704,222	(434,191)	2,270,031
259								
260	TOTAL FEDERAL TAXABLE INCOME	(1,918,885)	(36,847,896)	(38,766,780)	21,035,090	(13,325,442)	(6,457,735)	(19,783,177)
261								
262	FEDERAL TAX AT 35 PERCENT; ORDERED EFF. RATE	(671,610)	(12,896,763)	(13,568,373)	7,362,281	(4,663,905)	(2,260,207)	(6,924,112)
263	ADD: TAX ADJ / TAX DEFICIENCY PAYMENT	65,221,919	0	65,221,919	(65,221,919)	0	0	0
264	PRIOR YEARS' TAX ADJUSTMENT	(58,582,917)	0	(58,582,917)	58,582,917	0	0	0
265								
266	TOTAL FEDERAL INCOME TAX	5,967,392	(12,896,763)	(6,929,371)	723,279	(4,663,905)	(2,260,207)	(6,924,112)

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
267	<b>TABLE 11-OREGON STATE INCOME TAX</b>							
268	NET OPERATING INCOME BEFORE TAXES - OREGON	115,707,560	(3,616,412)	112,091,148	(22,010,195)	90,080,954	(6,891,926)	83,189,027
270	ALLOWANCE FOR AFUDC	27,226,240	(27,226,240)	0	0	0	0	0
272	STATE INCOME TAX ADJUSTMENTS - PLANT	(104,566,571)	0	(104,566,571)	(11,731,411)	(116,297,982)	0	(116,297,982)
273	STATE INCOME TAX ADJUSTMENTS - OTHER	(33,909,170)	0	(33,909,170)	49,504,979	15,595,809	0	15,595,809
274	ADD: MFG DEDUCTION NOT ALLOWED	(229,000)	0	(229,000)	229,000	0	0	0
275	TOTAL STATE INCOME TAX ADJUSTMENTS - OREGON	(111,478,501)	(27,226,240)	(138,704,741)	38,002,568	(100,702,173)	0	(100,702,173)
277	INCOME SUBJECT TO OREGON TAX	4,229,059	(30,842,652)	(26,613,593)	15,992,373	(10,621,219)	(6,891,926)	(17,513,146)
279	IERCO TAXABLE INCOME	5,286,622	0	5,286,622	4,913,378	10,200,000	0	10,200,000
281	BONUS DEPRECIATION & OTHER OREGON ADJ	78,338,493	0	78,338,493	(93,947,897)	(15,609,404)	0	(15,609,404)
282	TOTAL STATE TAXABLE INCOME - OREGON	87,854,174	(30,842,652)	57,011,523	(73,042,146)	(16,030,623)	(6,891,926)	(22,922,550)
284	OREGON TAX AT 0.3 PERCENT: ORDERED EFF. RATE	263,563	(92,528)	171,035	(219,126)	(48,092)	(20,676)	(68,768)
286	LESS: INVESTMENT TAX CREDIT	0	0	0	0	0	0	0
287	STATE INCOME TAX ALLOWED - OREGON	263,563	(92,528)	171,035	(219,126)	(48,092)	(20,676)	(68,768)
289	ADD: TAX ADJ / TAX DEFICIENCY PAYMENT	384,597	0	384,597	(384,597)	0	0	0
290	PRIOR YEARS' TAX ADJUSTMENT	(355,236)	0	(355,236)	355,236	0	0	0
291	STATE INCOME TAX PAID - OREGON	292,924	(92,528)	200,396	(248,487)	(48,092)	(20,676)	(68,768)
293								



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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
294	<b>TABLE 12-IDAHO STATE INCOME TAX</b>							
295								
296	NET OPERATING INCOME BEFORE TAXES - IDAHO	115,707,560	(3,616,412)	112,091,148	(22,010,195)	90,080,954	(6,891,926)	83,189,027
297								
298	ALLOWANCE FOR AFUDC	27,226,240	(27,226,240)	0	0	0	0	0
299	STATE INCOME TAX ADJUSTMENTS - PLANT	(104,566,571)	0	(104,566,571)	(11,731,411)	(116,297,982)	0	(116,297,982)
300	STATE INCOME TAX ADJUSTMENTS - OTHER	(33,909,170)	0	(33,909,170)	49,504,979	15,595,809	0	15,595,809
301								
302	INCOME SUBJECT TO IDAHO TAX	4,458,059	(30,842,652)	(26,384,593)	15,763,373	(10,621,219)	(6,891,926)	(17,513,146)
303								
304	IERCO TAXABLE INCOME	5,286,622	0	5,286,622	4,913,378	10,200,000	0	10,200,000
305	BONUS DEPRECIATION ADJUSTMENT	79,922,617	0	79,922,617	16,654,406	96,577,023	0	96,577,023
306	TOTAL STATE TAXABLE INCOME - IDAHO	89,667,298	(30,842,652)	58,824,646	37,331,158	96,155,804	(6,891,926)	89,263,877
307								
308	IDAHO TAX AT 5.9 PERCENT: ORDERED EFF. RATE	5,290,371	(1,819,716)	3,470,654	2,202,538	5,673,192	(406,624)	5,266,569
309	LESS: INVESTMENT TAX CREDIT	0	0	0	2,920,457	2,920,457	0	2,920,457
310								
311	STATE INCOME TAX ALLOWED - IDAHO	5,290,371	(1,819,716)	3,470,654	(717,919)	2,752,735	(406,624)	2,346,112
312	ADD: TAX ADJ / TAX DEFICIENCY PAYMENT	7,563,734	0	7,563,734	(7,563,734)	0	0	0
313	PRIOR YEARS' TAX ADJUSTMENT	(10,091,052)	0	(10,091,052)	10,091,052	0	0	0
314	STATE INCOME TAX PAID - IDAHO	2,763,053	(1,819,716)	943,336	1,809,399	2,752,735	(406,624)	2,346,112
315								
316								
317	<b>OTHER STATE INCOME TAX</b>							
318	INCOME SUBJECT TO TAX	4,458,059	(30,842,652)	(26,384,593)	15,763,373	(10,621,219)	(6,891,926)	(17,513,146)
319								
320	IERCO TAXABLE INCOME	5,286,622	0	5,286,622	4,913,378	10,200,000	0	10,200,000
321	BONUS DEPRECIATION ADJUSTMENT	0	0	0	0	0	0	0
322	TOTAL TAXABLE INCOME-OTHER STATES	9,744,681	(30,842,652)	(21,097,971)	20,676,751	(421,219)	(6,891,926)	(7,313,146)
323								
324	OTHER TAX AT 0.1 PERCENT	9,745	(30,843)	(21,098)	20,677	(421)	(6,892)	(7,313)
325	ADD: TAX ADJ / TAX DEFICIENCY PAYMENT	128,199	0	0	0	0	0	0
326	PRIOR YEARS' TAX ADJUSTMENT	(136,694)	0	0	0	0	0	0
327	OTHER STATES' INCOME TAX PAID	1,250	(22,348)	(21,098)	20,677	(421)	(6,892)	(7,313)

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
328	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
329	STEAM POWER GENERATION							
330	OPERATION							
331	500 / SUPERVISION & ENGINEERING	251,120		251,120		251,120		251,120
332	501 / FUEL	0		0		0		0
333	502 / STEAM EXPENSES	0		0		0		0
334	LABOR	0		0		0		0
335	OTHER	0		0		0		0
336								
337	505 / ELECTRIC EXPENSES			0				0
338	LABOR	0		0		0		0
339	OTHER	0		0		0		0
340								
341	506 / MISCELLANEOUS EXPENSES	25,816		25,816		25,816		25,816
342	507 / RENTS	0		0		0		0
343	STEAM OPERATION EXPENSES	276,936		276,936		276,936		276,936
344				0		0		0
345	MAINTENANCE			0		0		0
346	510 / SUPERVISION & ENGINEERING	0		0		0		0
347	511 / STRUCTURES	0		0		0		0
348	512 / BOILER PLANT			0		0		0
349	LABOR	0		0		0		0
350	OTHER	0		0		0		0
351	TOTAL ACCOUNT 512			0		0		0
352	513 / ELECTRIC PLANT			0		0		0
353	LABOR	0		0		0		0
354	OTHER	0		0		0		0
355	TOTAL ACCOUNT 513			0		0		0
356	514 / MISCELLANEOUS STEAM PLANT	0		0		0		0
357	STEAM MAINTENANCE EXPENSES	0		0		0		0
358	TOTAL STEAM GENERATION EXPENSES	276,936		276,936		276,936	0	276,936
359				0		0		0

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
360	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
361	HYDRAULIC POWER GENERATION							
362	OPERATION							
363	535 / SUPERVISION & ENGINEERING	4,138,379		4,138,379		4,138,379		4,138,379
364	536 / WATER FOR POWER	557,584		557,584		557,584		557,584
365	537 / HYDRAULIC EXPENSES	4,669,049		4,669,049		4,669,049		4,669,049
366	538 / ELECTRIC EXPENSES							
367	LABOR	1,133,916		1,133,916		1,133,916		1,133,916
368	OTHER	0		0		0		0
369	TOTAL ACCOUNT 538							
370	539 / MISCELLANEOUS EXPENSES	1,878,098		1,878,098		1,878,098		1,878,098
371	540 / RENTS	0		0		0		0
372	HYDRAULIC OPERATION EXPENSES	12,377,026		12,377,026		12,377,026		12,377,026
373		0		0		0		0
374	MAINTENANCE							
375	541 / SUPERVISION & ENGINEERING	1,632,395		1,632,395		1,632,395		1,632,395
376	542 / STRUCTURES	715,498		715,498		715,498		715,498
377	543 / RESERVOIRS, DAMS & WATERWAYS	632,240		632,240		632,240		632,240
378	544 / ELECTRIC PLANT							
379	LABOR	1,989,149		1,989,149		1,989,149		1,989,149
380	OTHER	0		0		0		0
381	TOTAL ACCOUNT 544	1,989,149		1,989,149		1,989,149		1,989,149
382	545 / MISCELLANEOUS HYDRAULIC PLANT	1,934,114		1,934,114		1,934,114		1,934,114
383	HYDRAULIC MAINTENANCE EXPENSES	6,903,396		6,903,396		6,903,396		6,903,396
384	TOTAL HYDRAULIC GENERATION EXPENSES	19,280,422		19,280,422		19,280,422		19,280,422

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
385	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
386	OTHER POWER GENERATION							
387	OPERATION							
388	546 / SUPERVISION & ENGINEERING	286,810		286,810		286,810		286,810
389	547 / FUEL	0		0		0		0
390	548 / GENERATING EXPENSES							
391	LABOR	327,712		327,712		327,712		327,712
392	OTHER	0		0		0		0
393	TOTAL ACCOUNT 548							
394	549 / MISCELLANEOUS EXPENSES	323,105		323,105		323,105		323,105
395	550 / RENTS	0		0		0		0
396	OTHER POWER OPER EXPENSES	937,627		937,627		937,627		937,627
397								
398	MAINTENANCE							
399	551 / SUPERVISION & ENGINEERING	0		0		0		0
400	552 / STRUCTURES	127,875		127,875		127,875		127,875
401	553 / GENERATING & ELECTRIC PLANT							
402	LABOR	88,691		88,691		88,691		88,691
403	OTHER	0		0		0		0
404	TOTAL ACCOUNT 553							
405	554 / MISCELLANEOUS EXPENSES	355,196		355,196		355,196		355,196
406	OTHER POWER MAINT EXPENSES	571,762		571,762		571,762		571,762
407	TOTAL OTHER POWER GENERATION EXP	1,509,389		1,509,389		1,509,389		1,509,389
408								
409	OTHER POWER SUPPLY EXPENSE							
410	555.0 / PURCHASED POWER	0		0		0		0
411	555.1 / COGENERATION & SMALL POWER PROD							
412	CAPACITY RELATED	0		0		0		0
413	ENERGY RELATED	0		0		0		0
414	TOTAL 555.1/CSPP							
415	555/TOTAL							
416	556 / LOAD CONTROL & DISPATCHING EXPENSES	0		0		0		0
417	557 / OTHER EXPENSES	1,969,127		1,969,127		1,969,127		1,969,127
418	TOTAL OTHER POWER SUPPLY EXPENSES	1,969,127		1,969,127		1,969,127		1,969,127
419								
420	TOTAL PRODUCTION EXPENSES	23,035,874		23,035,874		23,035,874		23,035,874

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1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
2								
3	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
421	TRANSMISSION EXPENSES							
422	OPERATION							
423	560 / SUPERVISION & ENGINEERING	1,876,009		1,876,009		1,876,009		1,876,009
424	561 / LOAD DISPATCHING	2,606,404		2,606,404		2,606,404		2,606,404
425	562 / STATION EXPENSES	1,406,018		1,406,018		1,406,018		1,406,018
426	563 / OVERHEAD LINE EXPENSES	325,684		325,684		325,684		325,684
427	565 / TRANSMISSION OF ELECTRICITY BY OTHERS	0		0		0		0
428	566 / MISCELLANEOUS EXPENSES	29,797		29,797		29,797		29,797
429	567 / RENTS	0		0		0		0
430	TOTAL TRANSMISSION OPERATION	6,243,912		6,243,912		6,243,912		6,243,912
431								
432	MAINTENANCE							
433	568 / SUPERVISION & ENGINEERING	128,017		128,017		128,017		128,017
434	569 / STRUCTURES	318,561		318,561		318,561		318,561
435	570 / STATION EQUIPMENT	1,938,436		1,938,436		1,938,436		1,938,436
436	571 / OVERHEAD LINES	835,101		835,101		835,101		835,101
437	573 / MISCELLANEOUS PLANT	0		0		0		0
438	TOTAL TRANSMISSION MAINTENANCE	3,220,115		3,220,115		3,220,115		3,220,115
439								
440	TOTAL TRANSMISSION EXPENSES	9,464,027		9,464,027		9,464,027		9,464,027
441								

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
3	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
442	DISTRIBUTION EXPENSES							
443	OPERATION							
444	580 / SUPERVISION & ENGINEERING	2,826,824		2,826,824		2,826,824		2,826,824
445	581 / LOAD DISPATCHING	2,940,004		2,940,004		2,940,004		2,940,004
446	582 / STATION EXPENSES	841,162		841,162		841,162		841,162
447	583 / OVERHEAD LINE EXPENSES	2,454,103		2,454,103		2,454,103		2,454,103
448	584 / UNDERGROUND LINE EXPENSES	640,628		640,628		640,628		640,628
449	585 / STREET LIGHTING & SIGNAL SYSTEMS	63,072		63,072		63,072		63,072
450	586 / METER EXPENSES	3,037,247		3,037,247		3,037,247		3,037,247
451	587 / CUSTOMER INSTALLATIONS EXPENSE	1,047,805		1,047,805		1,047,805		1,047,805
452	588 / MISCELLANEOUS EXPENSES	3,092,742		3,092,742		3,092,742		3,092,742
453	589 / RENTS	107		107		107		107
454	TOTAL DISTRIBUTION OPERATION	16,943,694		16,943,694		16,943,694		16,943,694
455	MAINTENANCE							
456	590 / SUPERVISION & ENGINEERING	303,700		303,700		303,700		303,700
457	591 / STRUCTURES	0		0		0		0
458	592 / STATION EQUIPMENT	2,190,252		2,190,252		2,190,252		2,190,252
459	593 / OVERHEAD LINES	5,129,594		5,129,594		5,129,594		5,129,594
460	594 / UNDERGROUND LINES	645,314		645,314		645,314		645,314
461	595 / LINE TRANSFORMERS	24,820		24,820		24,820		24,820
462	596 / STREET LIGHTING & SIGNAL SYSTEMS	327,168		327,168		327,168		327,168
463	597 / METERS	511,932		511,932		511,932		511,932
464	598 / MISCELLANEOUS PLANT	107,136		107,136		107,136		107,136
465	TOTAL DISTRIBUTION MAINTENANCE	9,239,916		9,239,916		9,239,916		9,239,916
466	TOTAL DISTRIBUTION EXPENSES	26,183,610		26,183,610		26,183,610		26,183,610
467	CUSTOMER ACCOUNTING EXPENSES							
468	901 / SUPERVISION	359,608		359,608		359,608		359,608
469	902 / METER READING	2,269,828		2,269,828		2,269,828		2,269,828
470	903 / CUSTOMER RECORDS & COLLECTIONS	6,906,743		6,906,743		6,906,743		6,906,743
471	904 / UNCOLLECTIBLE ACCOUNTS	0		0		0		0
472	905 / MISC EXPENSES	0		0		0		0
473	TOTAL CUSTOMER ACCOUNTING EXPENSES	9,536,179		9,536,179		9,536,179		9,536,179
474	CUSTOMER SERVICES & INFORMATION EXPENSES							
475	907 / SUPERVISION	279,335		279,335		279,335		279,335
476	908 / CUSTOMER ASSISTANCE	3,632,577		3,632,577		3,632,577		3,632,577
477	908 / DSM RIDER	0		0		0		0
478	909 / INFORMATION & INSTRUCTIONAL	0		0		0		0
479	910 / MISCELLANEOUS EXPENSES	508,430		508,430		508,430		508,430
480	TOTAL CUST SERV & INFORMATN EXPENSES	4,420,342		4,420,342		4,420,342		4,420,342

**IDAHO POWER COMPANY  
DEVELOPMENT OF SYSTEM REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

1	2	3	4	5	6	7	8	9
	Description	2010 Actual	2010 Actual Adjustments	2010 Base	Forecast Adjustment	2011 Unadjusted Test Year	Annualizing Adjustment	2011 Test Year
485	<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>							
486	ADMINISTRATIVE & GENERAL EXPENSES							
487	920 / ADMINISTRATIVE & GENERAL SALARIES	40,893,203		40,893,203		40,893,203		40,893,203
488	921 / OFFICE SUPPLIES	194,129		194,129		194,129		194,129
489	922 / ADMIN & GENERAL EXPENSES TRANSFERRED-CR	0		0		0		0
490	923 / OUTSIDE SERVICES	0		0		0		0
491	924 / PROPERTY INSURANCE	0		0		0		0
492	PRODUCTION - STEAM	0		0		0		0
493	ALL RISK & MISCELLANEOUS	231,444		231,444		231,444		231,444
494	TOTAL ACCOUNT 924							
495	925 / INJURIES & DAMAGES	162,751		162,751		162,751		162,751
496	926 / EMPLOYEE PENSIONS & BENEFITS	0		0		0		0
497	927 / FRANCHISE REQUIREMENTS	0		0		0		0
498	928 / REGULATORY COMMISSION EXPENSES							
499	928.101 / FERC ADMIN ASSESS & SECURITIES							
500	CAPACITY RELATED	0		0		0		0
501	ENERGY RELATED	0		0		0		0
502	928.101 / FERC ORDER 472	0		0		0		0
503	928.101 / FERC MISCELLANEOUS	0		0		0		0
504	928.102 FERC RATE CASE	0		0		0		0
505	928.104 / FERC OREGON HYDRO	0		0		0		0
506	SEC EXPENSES	0		0		0		0
507	928.202 / IDAHO PUC - RATE CASE	0		0		0		0
508	928.203 / IDAHO PUC - OTHER	0		0		0		0
509	928.301 / OREGON PUC - FILING FEES	0		0		0		0
510	928.302 / OREGON PUC - RATE CASE	0		0		0		0
511	928.303 / OREGON PUC - OTHER	0		0		0		0
512	IPC/PUC JSS TRUE-UP ADJ	0		0		0		0
513	TOTAL ACCOUNT 928							
514	929 / DUPLICATE CHARGES	0		0		0		0
515	930.1 / GENERAL ADVERTISING	0		0		0		0
516	930.2 / MISCELLANEOUS EXPENSES	0		0		0		0
517	931 / RENTS	132,751		132,751		132,751		132,751
518	TOTAL ADM & GEN OPERATION	41,614,278		41,614,278		41,614,278	0	41,614,278
519	PLUS:							
520	935 / GENERAL PLANT MAINTENANCE	1,072,390		1,072,390		1,072,390		1,072,390
521	416 / MERCHANDISING EXPENSE	0		0		0		0
522	TOTAL OPER & MAINT EXPENSES	115,326,700		115,326,700		115,326,700	0	115,326,700

Idaho Power/905  
Witness: Kelley Noe

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Kelley Noe  
Jurisdictional Separation Study – Oregon Revenue Requirement

July 29, 2011



**IDAHO POWER COMPANY  
JURISDICTIONAL SEPARATION STUDY  
OREGON REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

DESCRIPTION	ALLOC/ SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
<b>4 SUMMARY OF RESULTS</b>				
<b>5 RATE OF RETURN UNDER PRESENT RATES</b>				
6 TOTAL COMBINED RATE BASE		2,499,296,901	121,853,764	2,377,443,137
7				
8 OPERATING REVENUES				
9 FIRM JURISDICTIONAL SALES		852,039,782	39,873,591	812,166,191
10 HOKU 1ST BLOCK ENERGY SALES		23,981,399	1,109,655	22,871,744
11 SYSTEM OPPORTUNITY SALES		82,876,756	3,834,832	79,041,924
12 OTHER OPERATING REVENUES		44,555,238	1,958,872	42,596,366
13 TOTAL OPERATING REVENUES		1,003,453,175	46,776,951	956,676,224
14 OPERATING EXPENSES				
15 OPERATION & MAINTENANCE EXPENSES		684,766,241	31,790,864	652,975,377
16 DEPRECIATION EXPENSE		116,113,901	5,098,532	111,015,369
17 AMORTIZATION OF LIMITED TERM PLANT		7,208,808	331,470	6,877,337
18 TAXES OTHER THAN INCOME		27,632,526	2,029,747	25,602,779
19 REGULATORY DEBITS/CREDITS		27,757	27,757	0
20 PROVISION FOR DEFERRED INCOME TAXES		39,576,457	1,917,244	37,659,213
21 INVESTMENT TAX CREDIT ADJUSTMENT		(470,989)	(22,594)	(448,395)
22 FEDERAL INCOME TAXES		(6,924,112)	(549,346)	(6,374,766)
23 STATE INCOME TAXES		2,270,031	66,007	2,204,023
24 TOTAL OPERATING EXPENSES		870,200,619	40,689,682	829,510,937
25 OPERATING INCOME		133,252,556	6,087,268	127,165,287
26 ADD: IERCO OPERATING INCOME		6,629,998	306,780	6,323,218
27 CONSOLIDATED OPERATING INCOME		139,882,554	6,394,048	133,488,506
28 RATE OF RETURN UNDER PRESENT RATES		5.60%	5.25%	5.61%
29				
<b>30 DEVELOPMENT OF REVENUE REQUIREMENTS</b>				
31 RATE OF RETURN @ 10.5% ROE		8.170%	8.170%	8.170%
32				
33 RETURN				
34 EARNINGS DEFICIENCY		204,192,557	9,955,453	194,237,104
35 ADD: CWIP (HELLS CANYON RELICENSING)	D10	64,310,003	3,561,404	60,748,599
36 DEFICIENCY WITH CWIP		0	0	0
37				
38 NET-TO-GROSS TAX MULTIPLIER		1.642	1.642	1.642
39 <b>REVENUE DEFICIENCY</b>		105,597,025	5,847,826	99,749,199
40				
41 FIRM JURISDICTIONAL REVENUES		876,021,181	39,873,591	835,037,935
42 PERCENT INCREASE REQUIRED		12.05%	14.67%	11.95%
43				
44 SALES AND WHEELING REVENUES REQUIRED		981,618,206	45,721,417	934,787,134

**IDAHO POWER COMPANY  
JURISDICTIONAL SEPARATION STUDY  
OREGON REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

DESCRIPTION	SOURCE		SYSTEM		OTHER	
	ALLOCA	RETAIL	TOTAL	OTHER	RETAIL	OTHER
<b>45 SUMMARY OF RESULTS</b>						
<b>46 DEVELOPMENT OF RATE BASE COMPONENTS</b>						
47 ELECTRIC PLANT IN SERVICE			54,520,675		2,506,932	52,013,743
48 INTANGIBLE PLANT			1,816,031,496		78,698,067	1,737,333,429
49 PRODUCTION PLANT			869,772,561		37,783,895	831,988,666
50 TRANSMISSION PLANT			1,424,822,264		80,708,809	1,344,113,455
51 DISTRIBUTION PLANT			263,694,048		12,649,662	251,044,386
52 GENERAL PLANT			4,428,841,043		212,347,364	4,216,493,679
53 TOTAL ELECTRIC PLANT IN SERVICE			1,789,401,601		85,382,820	1,704,018,781
54 LESS: ACCUM PROVISION FOR DEPRECIATION			21,305,872		939,189	20,366,682
55 AMORT OF OTHER UTILITY PLANT			2,618,133,570		126,025,354	2,492,108,216
56 NET ELECTRIC PLANT IN SERVICE			17,261,533		20,254	17,241,279
57 LESS: CUSTOMER ADV FOR CONSTRUCTION			292,036,047		14,331,059	277,704,988
58 LESS: ACCUM DEFERRED INCOME TAXES			(13,254)		0	(13,254)
59 ADD: PLT HLD FOR FUTURE+ACQUIS ADJ			99,174,902		4,653,120	94,521,781
60 ADD: WORKING CAPITAL			2,303,419		1,408,630	894,789
61 ADD: CONSERVATION+OTHER DFRD PROG.			88,995,844		4,117,971	84,877,873
62 ADD: SUBSIDIARY RATE BASE			2,499,296,901		121,853,764	2,377,443,137
63 TOTAL COMBINED RATE BASE						
64						
<b>65 DEVELOPMENT OF NET INCOME COMPONENTS</b>						
66 OPERATING REVENUES			958,897,937		44,818,078	914,079,859
67 SALES REVENUES			44,555,238		1,958,872	42,596,366
68 OTHER OPERATING REVENUES			1,003,453,175		46,776,951	956,676,224
69 TOTAL OPERATING REVENUES						
70 OPERATING EXPENSES			684,766,241		31,790,864	652,975,377
71 OPERATION & MAINTENANCE EXPENSES			116,113,901		5,098,532	111,015,369
72 DEPRECIATION EXPENSE			7,208,808		331,470	6,877,337
73 AMORTIZATION OF LIMITED TERM PLANT			27,632,526		2,029,747	25,602,779
74 TAXES OTHER THAN INCOME			27,757		27,757	0
75 REGULATORY DEBITS/CREDITS			39,576,457		1,917,244	37,659,213
76 PROVISION FOR DEFERRED INCOME TAXES			(470,989)		(22,594)	(448,395)
77 INVESTMENT TAX CREDIT ADJUSTMENT			(6,924,112)		(549,346)	(6,374,766)
78 FEDERAL INCOME TAXES			2,270,031		66,007	2,204,023
79 STATE INCOME TAXES			870,200,619		40,689,682	829,510,937
80 TOTAL OPERATING EXPENSES			133,252,556		6,087,268	127,165,287
81 OPERATING INCOME			6,629,998		306,780	6,323,218
82 ADD: IERCO OPERATING INCOME						
83 CONSOLIDATED OPERATING INCOME			139,882,554		6,394,048	133,488,506
84						

**IDAHO POWER COMPANY  
JURISDICTIONAL SEPARATION STUDY  
OREGON REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

	DESCRIPTION	SOURCE ALLOC/	SYSTEM TOTAL	OREGON RETAIL	OTHER
107	<b>TABLE 1-ELECTRIC PLANT IN SERVICE</b>				
108	INTANGIBLE PLANT				
109	301 - ORGANIZATION	P101P	5,703	274	5,429
110	302 - FRANCHISES & CONSENTS	D10	23,400,154	1,014,050	22,386,104
111	303 - MISCELLANEOUS	P101P	31,114,818	1,492,608	29,622,210
112	TOTAL INTANGIBLE PLANT		54,520,675	2,506,932	52,013,743
114					
115	PRODUCTION PLANT				
116	310-316 / STEAM PRODUCTION	D10	937,956,085	40,646,504	897,309,582
117	330-336 / HYDRAULIC PRODUCTION	D10	702,810,444	30,456,423	672,354,021
118	340-346 / OTHER PRODUCTION	D10	175,264,966	7,595,140	167,669,826
119					
120	TOTAL PRODUCTION PLANT		1,816,031,496	78,698,067	1,737,333,429
121					
122	TRANSMISSION PLANT				
123	350 / LAND & LAND RIGHTS - SYSTEM SERVICE	D11	34,128,139	1,478,949	32,649,189
124	TRANSMISSION RETAIL	D12	125,006	5,417	119,589
125	DIRECT ASSIGNMENT	DA350	792	792	0
126	TOTAL ACCOUNT 350		34,253,937	1,485,158	32,768,778
127					
128	352 / STRUCTURES & IMPROVEMENTS - SYSTEM SERV	D11	54,683,468	2,369,718	52,313,749
129	TRANSMISSION RETAIL	D12	1,681,193	72,855	1,608,338
130	DIRECT ASSIGNMENT	DA352	658	658	0
131	TOTAL ACCOUNT 352		56,365,319	2,443,231	53,922,088
132					
133	353 / STATION EQUIPMENT - SYSTEM SERVICE	D11	335,775,911	14,550,912	321,224,998
134	TRANSMISSION RETAIL	D12	20,066,422	869,582	19,196,840
135	DIRECT ASSIGNMENT	DA353	74,044	36,494	37,550
136	TOTAL ACCOUNT 353		355,916,377	15,456,988	340,459,388
137					
138	354 / TOWERS & FIXTURES - SYSTEM SERVICE	D11	147,452,164	6,389,867	141,062,297
139	TRANSMISSION RETAIL	D12	0	0	0
140	DIRECT ASSIGNMENT	DA354	0	0	0
141	TOTAL ACCOUNT 354		147,452,164	6,389,867	141,062,297
142					
143	355 / POLES & FIXTURES - SYSTEM SERVICE	D11	102,342,273	4,435,022	97,907,251
144	TRANSMISSION RETAIL	D12	35,858	1,554	34,304
145	DIRECT ASSIGNMENT	DA355	34,064	33,630	434
146	TOTAL ACCOUNT 355		102,412,195	4,470,206	97,941,990
147					
148	356 / OVERHEAD CONDUCTORS & DEVICES - SYSTEM :	D11	172,866,106	7,491,185	165,374,920
149	TRANSMISSION RETAIL	D12	159,892	6,929	152,963
150	DIRECT ASSIGNMENT	DA356	28,221	26,534	1,687
151	TOTAL ACCOUNT 356		173,054,219	7,524,648	165,529,570
152					
153	359 / ROADS & TRAILS - SYSTEM SERVICE	D11	318,351	13,796	304,555
154	TRANSMISSION RETAIL	D12	0	0	0
155	DIRECT ASSIGNMENT	DA359	0	0	0
156	TOTAL ACCOUNT 359		318,351	13,796	304,555
157					
158	TOTAL TRANSMISSION PLANT		869,772,561	37,783,895	831,988,666

**IDAHO POWER COMPANY  
JURISDICTIONAL SEPARATION STUDY  
OREGON REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

	DESCRIPTION	SOURCE ALLOC/	SYSTEM TOTAL	OREGON RETAIL	OTHER
159	<b>TABLE 1-ELECTRIC PLANT IN SERVICE</b>				
160					
161	DISTRIBUTION PLANT		4,745,190	136,079	4,609,110
162	360 / LAND & LAND RIGHTS - SYSTEM SERVICE	DA360	89,946	305	89,641
163	PLUS: ADJUSTMENT FOR CIAC	DA360C	4,835,136	136,384	4,698,751
164	DISTRIBUTION PLANT + CIAC				
165					
166	361 / STRUCTURES & IMPROVEMENTS - SYSTEM SERVICE	DA361	30,780,615	1,199,046	29,581,569
167	PLUS: ADJUSTMENT FOR CIAC	DA361C	6,129,068	30,890	6,098,178
168	DISTRIBUTION PLANT + CIAC		36,909,683	1,229,936	35,679,747
169					
170	362 / STATION EQUIPMENT - SYSTEM SERVICE	DA362	195,725,125	6,511,152	189,213,972
171	PLUS: ADJUSTMENT FOR CIAC	DA362C	24,743,557	91,357	24,652,200
172	DISTRIBUTION PLANT + CIAC		220,468,682	6,602,509	213,866,172
173					
174	364 / POLES, TOWERS & FIXTURES	DA364	229,145,727	16,898,073	212,247,654
175	365 / OVERHEAD CONDUCTORS & DEVICES	DA365	123,244,038	7,413,400	115,830,638
176	366 / UNDERGROUND CONDUIT	DA366	49,340,813	690,605	48,650,209
177	367 / UNDERGROUND CONDUCTORS & DEVICES	DA367	195,482,555	3,265,467	192,217,088
178	368 / LINE TRANSFORMERS	DA368	420,987,096	38,182,883	382,804,213
179	369 / SERVICES	DA369	58,328,068	2,993,636	55,334,432
180	370 / ALL OTHER METERS	DA370	14,811,250	1,046,093	13,765,158
181	AMI	DA370A	53,969,519	1,918,616	52,050,903
182	PRE-AMI (OREGON)	CODA	0	0	0
183	PRE-AMI (IDAHO)	CIDA	41,108,636	0	41,108,636
184	TOTAL ACCOUNT 370		109,889,405	2,964,709	106,924,696
185	371 / INSTALLATIONS ON CUSTOMER PREMISES	DA371	2,776,999	237,207	2,539,792
186	373 / STREET LIGHTING SYSTEMS	DA373	4,376,633	216,551	4,160,082
187					
188	TOTAL DISTRIBUTION PLANT (without CIAC)		1,424,822,264	80,708,809	1,344,113,455
189					
190	GENERAL PLANT				
191	389 / LAND & LAND RIGHTS	PTD	11,796,672	565,898	11,230,774
192	390 / STRUCTURES & IMPROVEMENTS	PTD	83,159,345	3,989,235	79,170,110
193	391 / OFFICE FURNITURE & EQUIPMENT	PTD	42,455,976	2,036,655	40,419,321
194	392 / TRANSPORTATION EQUIPMENT	PTD	60,415,459	2,898,189	57,517,270
195	393 / STORES EQUIPMENT	PTD	1,507,622	72,322	1,435,300
196	394 / TOOLS, SHOP & GARAGE EQUIPMENT	PTD	5,714,737	274,142	5,440,596
197	395 / LABORATORY EQUIPMENT	PTD	12,315,358	590,780	11,724,578
198	396 / POWER OPERATED EQUIPMENT	PTD	9,796,782	469,961	9,326,821
199	397 / COMMUNICATIONS EQUIPMENT	PTD	31,390,116	1,505,815	29,884,301
200	398 / MISCELLANEOUS EQUIPMENT	PTD	5,141,981	246,666	4,895,315
201					
202	TOTAL GENERAL PLANT		263,694,048	12,649,662	251,044,386
203					
204	TOTAL ELECTRIC PLANT IN SERVICE (without CIAC)		4,428,841,043	212,347,364	4,216,493,679

**IDAHO POWER COMPANY**  
**JURISDICTIONAL SEPARATION STUDY**  
**OREGON REVENUE REQUIREMENT**  
**FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

**TABLE 2-ACCUMULATED PROVISION FOR DEPRECIATION**

DESCRIPTION	SOURCE	OREGON		
		ALLOC/	RETAIL	OTHER
		TOTAL		
		SYSTEM		
205				
206				
207	PRODUCTION PLANT			
208	310-316 / STEAM PRODUCTION	L 116	520,071,289	22,537,387
209	330-336 / HYDRAULIC PRODUCTION	L 117	345,406,476	14,968,255
210	340-346 / OTHER PRODUCTION	L 118	30,834,243	1,336,208
211	TOTAL PRODUCTION PLANT		896,312,008	38,841,850
212				497,533,902
213	TRANSMISSION PLANT			330,438,221
214	350 / LAND & LAND RIGHTS	L 126	5,653,832	245,135
215	352 / STRUCTURES & IMPROVEMENTS	L 131	20,989,256	909,808
216	353 / STATION EQUIPMENT	L 136	98,514,383	4,278,352
217	354 / TOWERS & FIXTURES	L 141	41,245,823	1,787,395
218	355 / POLES & FIXTURES	L 146	51,527,571	2,249,135
219	356 / OVERHEAD CONDUCTORS & DEVICES	L 151	53,587,773	2,330,074
220	359 / ROADS & TRAILS	L 156	288,250	11,191
221	TOTAL TRANSMISSION PLANT		271,776,889	11,811,091
222				247,059
223	DISTRIBUTION PLANT			259,965,798
224	360 / LAND & LAND RIGHTS	L 162	0	0
225	361 / STRUCTURES & IMPROVEMENTS	L 166	8,257,684	321,675
226	362 / STATION EQUIPMENT	L 170	44,910,718	1,494,037
227	364 / POLES, TOWERS & FIXTURES	L 174	112,472,074	8,294,116
228	365 / OVERHEAD CONDUCTORS & DEVICES	L 175	43,287,681	2,603,849
229	366 / UNDERGROUND CONDUIT	L 176	12,364,028	173,055
230	367 / UNDERGROUND CONDUCTORS & DEVICES	L 177	68,988,474	1,152,094
231	368 / LINE TRANSFORMERS	L 178	140,743,262	12,765,198
232	369 / SERVICES	L 179	37,256,094	1,912,136
233	370 / ALL OTHER METERS	L 180	5,500,778	388,510
234	AMI	L 181	4,524,545	160,848
235	PRE-AMI (OREGON)	L 182	0	0
236	PRE-AMI (IDAHO)	L 183	30,679,225	0
237	371 / INSTALLATIONS ON CUSTOMER PREMISES	L 185	2,231,210	190,587
238	373 / STREET LIGHTING SYSTEMS	L 186	3,312,129	163,881
239	TOTAL DISTRIBUTION PLANT		514,507,903	29,619,984
240				484,887,919

**IDAHO POWER COMPANY**  
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DESCRIPTION	SOURCE ALLOC	SYSTEM TOTAL	OREGON		OTHER
			RETAIL		
241 <b>TABLE 2-ACCUMULATED PROVISION FOR DEPRECIATION</b>					
242					
243 GENERAL PLANT		0	0	0	
244 389 / LAND & LAND RIGHTS	L 191				
245 390 / STRUCTURES & IMPROVEMENTS	L 192	22,446,276	1,076,770	21,369,507	
246 391 / OFFICE FURNITURE & EQUIPMENT	L 193	26,389,318	1,265,921	25,123,396	
247 392 / TRANSPORTATION EQUIPMENT	L 194	19,565,405	938,572	18,626,834	
248 393 / STORES EQUIPMENT	L 195	541,617	25,982	515,635	
249 394 / TOOLS, SHOP & GARAGE EQUIPMENT	L 196	2,573,048	123,432	2,449,616	
250 395 / LABORATORY EQUIPMENT	L 197	5,856,989	280,965	5,576,023	
251 396 / POWER OPERATED EQUIPMENT	L 198	3,954,543	189,703	3,764,840	
252 397 / COMMUNICATIONS EQUIPMENT	L 199	16,455,048	789,365	15,665,683	
253 398 / MISCELLANEOUS EQUIPMENT	L 200	2,169,571	104,076	2,065,495	
254 TOTAL GENERAL PLANT		99,951,816	4,794,786	95,157,029	
255					
256 AMORTIZATION OF DISALLOWED COSTS	L 113	6,852,985	315,109	6,537,876	
257					
258 TOTAL ACCUM PROVISION DEPRECIATION		1,789,401,601	85,382,820	1,704,018,781	
259					
260 AMORTIZATION OF OTHER UTILITY PLANT					
261 INTANGIBLE PLANT	L 113	6,007,098	276,214	5,730,884	
262 HYDRAULIC PRODUCTION	L 117	15,298,774	662,975	14,635,799	
263					
264 TOTAL AMORT OF OTHER UTILITY PLANT		21,305,872	939,189	20,366,682	
265					
266 TOTAL ACCUM PROVISION FOR DEPR					
267 & AMORTIZATION OF OTHER UTILITY PLANT		1,810,707,473	86,322,010	1,724,385,463	
268					

**IDAHO POWER COMPANY**  
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**TABLE 3-ADDITIONS & DEDUCTIONS TO RATEBASE**

DESCRIPTION	SOURCE	TOTAL	OREGON	OTHER
	ALLOC/	SYSTEM	RETAIL	
	OTHER			
269				
270				
271		2,618,133,570	126,025,354	2,492,108,216
272				
272 LESS:				
273				
273 252				
274	D10	0	0	0
274	DA252	17,261,533	20,254	17,241,279
275				
276		17,261,533	20,254	17,241,279
277				
278				
278				
279				
279 190/				
280				
280	DA252	(6,119,047)	(7,180)	(6,111,867)
281	LABOR	(15,974,945)	(730,887)	(15,244,058)
282		(22,093,992)	(738,067)	(21,355,925)
283	P101P	0	0	0
283 281/	P101P	294,576,289	14,131,113	280,445,176
284	P101P	19,553,750	938,013	18,615,737
285	P101P	292,036,047	14,331,059	277,704,988
286				
286				
287				
288		2,308,835,990	111,674,042	2,197,161,949
289				
289 ADD:				
290				
290	E10	25,531,502	1,181,381	24,350,121
291				
291 151/				
292	L 120	14,111,733	611,535	13,500,198
292 154 & 163/	L 158	13,113,870	569,681	12,544,189
293	L 188+CIAC	14,068,033	781,117	13,286,916
294	L 204	4,959,114	237,772	4,721,342
295		46,252,750	2,200,105	44,052,645
296				
296	L 688	0	0	0
297	D10	0	0	0
298	L 120	0	0	0
299	L 1020	0	0	0
299 AD	L 1020	0	0	0
300	P101P	0	0	0
300	L 608	27,390,650	1,271,635	26,119,015
301				
301		99,174,902	4,653,120	94,521,781
302				
302		2,408,010,892	116,327,162	2,291,683,730
303				
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**IDAHO POWER COMPANY**  
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DESCRIPTION	SOURCE	TOTAL SYSTEM		OREGON	
		ALLOC/	OTHER	RETAIL	OTHER
<b>TABLE 3-ADDITIONS &amp; DEDUCTIONS TO RATEBASE</b>					
311 NET ELECTRIC PLANT IN SERVICE		2,408,010,892		116,327,162	2,291,683,730
312 ADD:					
313 105./ PLANT HELD FOR FUTURE USE	L 117	0		0	0
314 HYDRAULIC PRODUCTION	L 126	0		0	0
315 TRANS LAND & LAND RIGHTS	L 131	0		0	0
316 TRANS STRUCTURES & IMPROVEMENTS	L 136	0		0	0
317 TRANS STATION EQUIPMENT	L 164	0		0	0
318 DIST LAND & LAND RIGHTS	L 168	0		0	0
319 DIST STRUCTURES & IMPROVEMENTS	L 191	0		0	0
320 GEN LAND & LAND RIGHTS	L 192	0		0	0
321 GEN STRUCTURES & IMPROVEMENTS	L 194	0		0	0
322 TRANSPORTATION EQUIPMENT		0		0	0
323 TOTAL PLANT HELD FOR FUTURE USE				0	0
324 114/115 - PRAIRIE ACQUISITION ADJUSTMENT (ACCOUN	CIDA	(13,254)		0	(13,254)
325 DEFERRED PROGRAMS:					
326 182/ CONSERVATION PROGRAMS					
327 IDAHO DEFERRED CONSERVATION PROGRAMS	CIDA	0		0	0
328 OREGON DEFERRED CONSERVATION PROGRAMS	CODA	0		0	0
329 TOTAL CONSERVATION PROGRAMS				0	0
330 182./MISC. OTHER REGULATORY ASSETS					
331 OTHER DEFERRED	D10	0		0	0
332 CUB FUND GRAND - (OPUC ORDER 10-406	CODA	0		0	0
333 ZGA ARCHITECTS & PLANNERS	LABOR	0		0	0
334 PENSION DEFERRAL - OPUC ORDER 10-064	CODA	1,323,161		1,323,161	0
335 INTERVENOR FUNDING	CIDA	0		0	0
336 GRID WEST - OPUC ORDER 06-483	CODA	44,937		44,937	0
337 GRID WEST - FERC	D11	111,728		4,842	106,886
338 TOTAL OTHER REGULATORY ASSETS		1,479,826		1,372,940	106,886
339 186./MISC. OTHER DEFERRED PROGRAMS					
340 AM. FALLS BOND REFINANCING	D10	823,593		35,691	787,902
341 TOTAL DEFERRED PROGRAMS		2,303,419		1,408,630	894,789
342 DEVELOPMENT OF IERCO RATE BASE					
343 INVESTMENT IN IERCO	E10	75,106,349		3,475,284	71,631,065
344 PREPAID COAL ROYALTIES	E10	1,396,225		64,605	1,331,620
345 NOTES PAYABLE TO/RECEIVABLE FROM SUBSIDIARY	E10	12,493,270		578,082	11,915,188
346 TOTAL SUBSIDIARY RATE BASE		88,995,844		4,117,971	84,877,873
347 TOTAL COMBINED RATE BASE		2,499,296,901		121,853,764	2,377,443,137



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	DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
354	<b>TABLE 4-OPERATING REVENUES</b>				
355	FIRM ENERGY SALES				
356	440-448 / RETAIL	RETREV	852,039,782	39,873,591	812,166,191
357	442 / HOKU BLOCK 1 ENERGY	E10	23,981,399	1,109,655	22,871,744
358	447 / FIRM SALES FOR RESALE	RESREV	0	0	0
359	447 / SYSTEM OPPORTUNITY SALES	E10	82,876,756	3,834,832	79,041,924
360	447 / SYSTEM OPPORTUNITY LOSS REVENUES	E10	0	0	0
361	TOTAL SALES OF ELECTRICITY		958,897,937	44,818,078	914,079,859
362					
363	OTHER OPERATING REVENUES				
364	415 / MERCHANDISING REVENUES	D60	784,615	32,165	752,450
365					
366	449 / OATT TARIFF REFUND				
367	NETWORK	D11	0	0	0
368	POINT-TO-POINT	D11	0	0	0
369	TOTAL ACCOUNT 449		0	0	0
370					
371	451 / MISCELLANEOUS SERVICE REVENUES	DA451	3,532,832	77,330	3,455,502
372					
373	454 / RENTS FROM ELECTRIC PROPERTY				
374	SUBSTATION EQUIPMENT	L 136	9,968,654	432,926	9,535,728
375	TRANSFORMER RENTALS	D11	17,330	751	16,579
376	LINE RENTALS	D11	2,067,177	89,581	1,977,595
377	COGENERATION	L 493	857,342	39,671	817,672
378	REAL ESTATE RENTS	L 202	240,575	11,541	229,034
379	DARK FIBER PROJECT	CIDA	448,000	0	448,000
380	POLE ATTACHMENTS	L 174	1,660,518	122,453	1,538,065
381	FACILITIES CHARGES	DA454	6,312,816	358,513	5,954,303
382	OTHER RENTALS	L 117	338,693	14,677	324,016
383	MISCELLANEOUS	DA454MISC	0	0	0
384	TOTAL ACCOUNT 454		21,911,105	1,070,112	20,840,993
385					
386	456 / OTHER ELECTRIC REVENUES				
387	TRANSMISSION NETWORK SERVICES- FIRM DA	D11	4,794,188	207,757	4,586,431
388	TRANSMISSION NETWORK SERVICES - DIST FACILITIE	D60	685,063	28,084	656,979
389	TRANSMISSION POINT-TO-POINT	D11	12,457,650	539,855	11,917,795
390	PHOTOVOLTAIC STATION SERVICE	L 188+CIAC	5,007	278	4,729
391	ENERGY EFFICIENCY RIDER	CIDA	0	0	0
392	STAND-BY SERVICE	DASTNBY	309,185	0	309,185
393	SIERRA PACIFIC USAGE CHARGE	E10	(0)	(0)	(0)
394	ANTELOPE	L 512	73,824	3,207	70,617
395	MISCELLANEOUS	L 202	1,769	85	1,684
396	TOTAL ACCOUNT 456		18,326,686	779,265	17,547,421
397					
398	TOTAL OTHER OPERATING REVENUES		44,555,238	1,958,872	42,596,366
399					
400	TOTAL OPERATING REVENUES		1,003,453,175	46,776,951	956,676,224

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DESCRIPTION	SOURCE	TOTAL		OREGON	
		ALLOC/	SYSTEM	RETAIL	OTHER
<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>					
401 STEAM POWER GENERATION					
403 OPERATION					
404 500 / SUPERVISION & ENGINEERING	D10		2,188,853	94,854	2,093,999
405 501 / FUEL	E10	149,354,701		6,910,867	142,443,834
406 502 / STEAM EXPENSES					
407 LABOR	D10		2,630,419	113,990	2,516,429
408 OTHER	E10		5,987,144	277,034	5,710,110
409 TOTAL ACCOUNT 502			8,617,563	391,024	8,226,539
410 505 / ELECTRIC EXPENSES					
411 LABOR	D10		1,173,413	50,850	1,122,563
412 OTHER	E10		1,340,126	62,010	1,278,116
413 TOTAL ACCOUNT 505			2,513,539	112,860	2,400,679
414 506 / MISCELLANEOUS EXPENSES	D10		11,439,644	495,739	10,943,905
415 507 / RENTS	L 116		269,318	11,671	257,647
416 STEAM OPERATION EXPENSES			174,383,618	8,017,015	166,366,603
417					
418 MAINTENANCE					
419 510 / SUPERVISION & ENGINEERING	D10		2,692,729	116,690	2,576,039
420 511 / STRUCTURES	D10		363,343	15,746	347,597
421 512 / BOILER PLANT					
422 LABOR	D10		6,236,518	270,261	5,966,257
423 OTHER	E10		12,634,271	584,607	12,049,664
424 TOTAL ACCOUNT 512			18,870,789	854,867	18,015,922
425 513 / ELECTRIC PLANT					
426 LABOR	D10		1,993,219	86,377	1,906,842
427 OTHER	E10		2,605,076	120,541	2,484,535
428 TOTAL ACCOUNT 513			4,598,295	206,917	4,391,378
429 514 / MISCELLANEOUS STEAM PLANT					
430 STEAM MAINTENANCE EXPENSES	D10		4,407,711	191,009	4,216,702
431 TOTAL STEAM GENERATION EXPENSES			30,932,867	1,385,229	29,547,638
432			205,316,485	9,402,244	195,914,241

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DESCRIPTION	SOURCE	TOTAL		OTHER
		ALLOC/	SYSTEM	
		OREGON	RETAIL	
<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>				
434 HYDRAULIC POWER GENERATION				
435 OPERATION				
436 535 / SUPERVISION & ENGINEERING	L 873	5,716,476	248,861	5,467,615
437 536 / WATER FOR POWER	D10	7,588,140	328,833	7,259,307
438 537 / HYDRAULIC EXPENSES	D10	11,953,308	517,999	11,435,309
439 538 / ELECTRIC EXPENSES				
440 LABOR	D10	1,178,782	51,083	1,127,699
441 OTHER	E10	487,345	22,550	464,795
442 TOTAL ACCOUNT 538		1,666,127	73,633	1,592,494
443 539 / MISCELLANEOUS EXPENSES	D10	3,071,458	133,102	2,938,356
444 540 / RENTS	D10	419,836	18,194	401,642
445 HYDRAULIC OPERATION EXPENSES		30,415,345	1,320,622	29,094,723
446				
447 MAINTENANCE				
448 541 / SUPERVISION & ENGINEERING	L 884	2,102,821	91,126	2,011,695
449 542 / STRUCTURES	D10	1,224,425	53,061	1,171,364
450 543 / RESERVOIRS, DAMS & WATERWAYS	D10	1,440,450	62,422	1,378,028
451 544 / ELECTRIC PLANT				
452 LABOR	D10	2,067,853	89,611	1,978,242
453 OTHER	E10	1,300,091	60,157	1,239,934
454 TOTAL ACCOUNT 544		3,367,944	149,768	3,218,176
455 545 / MISCELLANEOUS HYDRAULIC PLANT		3,212,310	139,206	3,073,104
456 HYDRAULIC MAINTENANCE EXPENSES	L 117	11,347,950	495,583	10,852,367
457 TOTAL HYDRAULIC GENERATION EXPENSES		41,763,295	1,816,205	39,947,090

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DESCRIPTION	SOURCE	SYSTEM		OREGON		OTHER
		ALLOC	TOTAL	RETAIL		
<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>						
458 OTHER POWER GENERATION						
459 OPERATION						
461 546 / SUPERVISION & ENGINEERING	L 897		351,550	15,234	336,316	
462 547 / FUEL						
463 DIESEL FUEL	E:10		14,672	679	13,993	
464 OTHER	E:10		4,958,565	229,440	4,729,125	
465 TOTAL ACCOUNT 547			4,973,237	230,119	4,743,118	
466 548 / GENERATING EXPENSES						
467 LABOR	D:10		12,967	562	12,405	
468 OTHER	E:10		464,632	21,499	443,133	
469 TOTAL ACCOUNT 548			477,599	22,061	455,538	
470 549 / MISCELLANEOUS EXPENSES	D:10		478,875	20,752	458,123	
471 550 / RENTS	D:10		0	0	0	
472 OTHER POWER OPER EXPENSES			6,281,261	288,167	5,993,094	
473						
474 MAINTENANCE						
475 551 / SUPERVISION & ENGINEERING	L 907		44	2	42	
476 552 / STRUCTURES	D:10		193,536	8,387	185,149	
477 553 / GENERATING & ELECTRIC PLANT						
478 LABOR	D:10		3,509	152	3,357	
479 OTHER	E:10		122,742	5,679	117,063	
480 TOTAL ACCOUNT 553			126,251	5,832	120,419	
481 554 / MISCELLANEOUS EXPENSES	L 118		2,385,754	103,387	2,282,367	
482 OTHER POWER MAINT EXPENSES			2,705,585	117,607	2,587,978	
483 TOTAL OTHER POWER GENERATION EXP			8,986,846	405,774	8,581,072	
484						
485 OTHER POWER SUPPLY EXPENSE						
486 555.0 / PURCHASED POWER	E:10		70,960,713	3,283,459	67,677,254	
487 POWER EXPENSE	E:10		1,366,000	63,207	1,302,793	
488 TRANSMISSION LOSSES			72,326,713	3,346,666	68,980,047	
489 TOTAL 555.0/PURCHASED POWER			0	0	0	
490 555.1 / COGENERATION & SMALL POWER PROD	D:10		129,051,222	5,971,394	123,079,828	
491 CAPACITY RELATED	E:10		129,051,222	5,971,394	123,079,828	
492 ENERGY RELATED			201,377,935	9,318,060	192,059,875	
493 TOTAL 555.1/CSPP			165	7	158	
494 555/TOTAL						
495 556 / LOAD CONTROL & DISPATCHING EXPENSES	D:10		0	0	0	
496 557 / OTHER EXPENSES						
497 PCA/ EPC ACCOUNTS	D:10		2,738,461	118,672	2,619,789	
498 OTHER	D:10		2,738,461	118,672	2,619,789	
499 557/TOTAL			204,116,561	9,436,739	194,679,822	
500 TOTAL OTHER POWER SUPPLY EXPENSES						
501						
502 TOTAL PRODUCTION EXPENSES			460,183,187	21,060,961	439,122,226	

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DESCRIPTION	SOURCE		TOTAL SYSTEM	OREGON	
	ALLOC/	OTHER		RETAIL	OTHER
<b>503 TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>					
504 TRANSMISSION EXPENSES					
505 OPERATION					
506 560 / SUPERVISION & ENGINEERING	L 158		3,171,937	137,792	3,034,145
507 561 / LOAD DISPATCHING	D12		3,162,144	137,032	3,025,112
508 562 / STATION EXPENSES	L 136		2,113,074	91,768	2,021,306
509 563 / OVERHEAD LINE EXPENSES	L 141+146+151		3,059,773	133,012	2,926,761
510 565 / TRANSMISSION OF ELECTRICITY BY OTHERS	E10		7,978,600	369,182	7,609,418
511 566 / MISCELLANEOUS EXPENSES	L 158		349,219	15,170	334,049
512 567 / RENTS	L 158		2,182,089	94,792	2,087,297
513 TOTAL TRANSMISSION OPERATION			22,016,837	978,749	21,038,088
514					
515 MAINTENANCE					
516 568 / SUPERVISION & ENGINEERING	L 158		563,653	24,486	539,167
517 569 / STRUCTURES	L 131		446,720	19,364	427,356
518 570 / STATION EQUIPMENT	L 136		3,644,442	158,273	3,486,169
519 571 / OVERHEAD LINES	L 141+146+151		2,908,685	126,444	2,782,241
520 573 / MISCELLANEOUS PLANT	L 158		(42)	(2)	(40)
521 TOTAL TRANSMISSION MAINTENANCE			7,563,458	328,565	7,234,893
522					
523 TOTAL TRANSMISSION EXPENSES			29,580,295	1,307,314	28,272,981

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DESCRIPTION	SOURCE	OREGON		
		ALLOC/	SYSTEM	RETAIL
		TOTAL		OTHER
<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>				
524 DISTRIBUTION EXPENSES				
526 OPERATION				
527 580 / SUPERVISION & ENGINEERING	L 188	3,956,164	224,096	3,732,068
528 581 / LOAD DISPATCHING	D60	3,659,095	150,003	3,509,092
529 582 / STATION EXPENSES	L 172	1,355,913	40,606	1,315,307
530 583 / OVERHEAD LINE EXPENSES	L 174+175	3,234,009	223,115	3,010,894
531 584 / UNDERGROUND LINE EXPENSES	L 176+177	1,878,785	30,359	1,848,426
532 585 / STREET LIGHTING & SIGNAL SYSTEMS	L 186	84,813	4,196	80,617
533 586 / METER EXPENSES	L 180+183	4,244,729	114,519	4,130,210
534 587 / CUSTOMER INSTALLATIONS EXPENSE	L 185	1,616,481	138,078	1,478,403
535 588 / MISCELLANEOUS EXPENSES	L 188	5,301,340	300,293	5,001,047
536 589 / RENTS	L 188	591,115	33,484	557,631
537 TOTAL DISTRIBUTION OPERATION		25,922,444	1,258,749	24,663,695
538				
539 MAINTENANCE				
540 590 / SUPERVISION & ENGINEERING	L 188	397,289	22,504	374,785
541 591 / STRUCTURES	L 168	(11,761)	(392)	(11,369)
542 592 / STATION EQUIPMENT	L 172	3,993,039	119,582	3,873,457
543 593 / OVERHEAD LINES	L 174+175	14,982,202	1,033,626	13,948,576
544 594 / UNDERGROUND LINES	L 176+177	1,064,194	17,196	1,046,998
545 595 / LINE TRANSFORMERS	L 178	464,002	42,084	421,918
546 596 / STREET LIGHTING & SIGNAL SYSTEMS	L 186	621,299	30,741	590,558
547 597 / METERS	L 180+183	704,013	18,994	685,019
548 598 / MISCELLANEOUS PLANT	L 188	146,655	8,307	138,348
549 TOTAL DISTRIBUTION MAINTENANCE		22,360,932	1,292,643	21,068,289
550 TOTAL DISTRIBUTION EXPENSES		48,283,376	2,551,393	45,731,983
551				
552 CUSTOMER ACCOUNTING EXPENSES				
553 901 / SUPERVISION	L 977	439,550	20,343	419,207
554 902 / METER READING	CW902	2,193,502	152,560	2,040,942
555 903 / CUSTOMER RECORDS & COLLECTIONS	CW903	13,712,922	513,166	13,199,756
556 904 / UNCOLLECTIBLE ACCOUNTS	CW904	4,638,855	158,891	4,479,964
557 905 / MISC EXPENSES	L 554+555+556	354	14	340
558 TOTAL CUSTOMER ACCOUNTING EXPENSES		20,985,183	844,974	20,140,209
559				
560 CUSTOMER SERVICES & INFORMATION EXPENSES				
561 907 / SUPERVISION	L 985	376,192	13,789	362,403
562 908 / CUSTOMER ASSISTANCE	E10	333,928	15,451	318,477
563 SYSTEM CONSERVATION	DA908	6,229,580	225,125	6,004,455
564 OTHER CUSTOMER ASSISTANCE		6,563,508	240,577	6,322,931
565 TOTAL ACCOUNT 908		32,557	1,218	31,339
566 909 / INFORMATION & INSTRUCTIONAL	DA909	913,998	33,505	880,493
567 910 / MISCELLANEOUS EXPENSES	L 562+566	7,886,255	289,088	7,597,167
568 TOTAL CUST SERV & INFORMATN EXPENSES				

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DESCRIPTION	SOURCE	TOTAL		OTHER
		ALLOC/	SYSTEM	
<b>OREGON RETAIL</b>				
<b>TABLE 5-OPERATION &amp; MAINTENANCE EXPENSES</b>				
569 ADMINISTRATIVE & GENERAL EXPENSES			57,264,382	54,644,418
571 920 / ADMINISTRATIVE & GENERAL SALARIES	LABOR		14,905,281	14,223,333
572 921 / OFFICE SUPPLIES	LABOR		(28,798,299)	(27,480,717)
573 922 / ADMIN & GENERAL EXPENSES TRANSFERRED-	LABOR		7,441,043	7,100,600
574 923 / OUTSIDE SERVICES	LABOR			
575 924 / PROPERTY INSURANCE				
576 PRODUCTION - STEAM	D10		809,837	774,743
577 ALL RISK & MISCELLANEOUS	P110P		2,545,937	2,436,822
578 TOTAL ACCOUNT 924			3,355,774	3,211,565
579 925 / INJURIES & DAMAGES	LABOR		5,862,281	5,594,069
580 926 / EMPLOYEE PENSIONS & BENEFITS	LABOR		26,543,429	25,329,012
581 EMPLOYEE PENSIONS & BENEFITS - OREGON	LABOR		893,024	0
582 EMPLOYEE PENSIONS & BENEFITS - IDAHO	CODA		17,153,713	17,153,713
583 EMPLOYEE PENSIONS & BENEFITS - FERC	CIDA		190,950	182,675
584 927 / FRANCHISE REQUIREMENTS	D11		2,633	2,633
585 928 / REGULATORY COMMISSION EXPENSES	CIDA			
586 928.101 / FERC ADMIN ASSESS & SECURITIES				
587 CAPACITY RELATED	D10		1,792,385	1,714,712
588 ENERGY RELATED	E10		762,063	726,801
589 928.101 / FERC ORDER 472	E99		503,013	479,564
590 928.101 / FERC MISCELLANIOUS	D11		581,969	556,749
591 928.102 FERC RATE CASE	D11		727	695
592 928.104 / FERC OREGON HYDRO	D11		163,733	156,638
593 928.202 / IDAHO PUC -RATE CASE	CIDA		55,373	55,373
594 928.203 / IDAHO PUC - OTHER	CIDA		67,748	67,748
595 928.301 / OREGON PUC - FILING FEES	CODA		0	0
596 928.302 / OREGON PUC - RATE CASE	CODA		6,748	0
597 928.303 / OREGON PUC - OTHER	CODA		299,262	0
598 IPC/PUC JSS TRUE-UP ADJ	PTD		0	0
599 TOTAL ACCOUNT 928			4,233,022	3,758,281
600 929 / DUPLICATE CHARGES	LABOR		0	0
601 930.1 / GENERAL ADVERTISING	LABOR		0	0
602 930.2 / MISCELLANEOUS EXPENSES	LABOR		3,790,748	3,617,313
603 931 / RENTS	L 202		25,188	23,980
604 TOTAL ADM & GEN OPERATION			112,863,170	107,360,876
605 PLUS:				
606 935 / GENERAL PLANT MAINTENANCE	L 202		4,370,619	4,160,956
607 416 / MERCHANDISING EXPENSE	D60		614,155	588,978
608 TOTAL OPER & MAINT EXPENSES			684,766,241	652,975,377

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DESCRIPTION	SOURCE	SYSTEM		OREGON		OTHER
		ALLOC/	TOTAL	RETAIL		
609 TABLE 6-DEPRECIATION & AMORTIZATION EXPENSE						
610						
611 DEPRECIATION EXPENSE						
612 310-316 / STEAM PRODUCTION	L 116		19,091,068	827,315	18,263,753	
613 330-336 / HYDRAULIC PRODUCTION	L 117		15,428,476	668,596	14,759,881	
614 340-346 / OTHER PRODUCTION	L 118		5,444,322	235,931	5,208,392	
615 TOTAL PRODUCTION PLANT			39,963,867	1,731,842	38,232,025	
616						
617 TRANSMISSION PLANT						
618 350 / LAND & LAND RIGHTS	L 126		455,047	19,730	435,318	
619 352 / STRUCTURES & IMPROVEMENTS	L 131		954,983	41,395	913,588	
620 353 / STATION EQUIPMENT	L 136		7,369,784	320,060	7,049,724	
621 354 / TOWERS & FIXTURES	L 141		2,940,288	127,418	2,812,870	
622 355 / POLES & FIXTURES	L 146		2,899,667	126,568	2,773,099	
623 356 / OVERHEAD CONDUCTORS & DEVICES	L 151		3,322,211	144,455	3,177,757	
624 359 / ROADS & TRAILS	L 156		3,133	136	2,997	
625 TOTAL TRANSMISSION PLANT			17,945,115	779,761	17,165,353	
626						
627 DISTRIBUTION PLANT						
628 360 / LAND & LAND RIGHTS	L 164		0	0	0	
629 361 / STRUCTURES & IMPROVEMENTS	L 168		593,228	19,768	573,460	
630 362 / STATION EQUIPMENT	L 172		3,664,706	109,749	3,554,957	
631 364 / POLES, TOWERS & FIXTURES	L 174		7,653,065	564,366	7,088,699	
632 365 / OVERHEAD CONDUCTORS & DEVICES	L 175		3,677,442	221,206	3,456,236	
633 366 / UNDERGROUND CONDUIT	L 176		982,581	13,753	968,828	
634 367 / UNDERGROUND CONDUCTORS & DEVICES	L 177		3,909,247	65,303	3,843,944	
635 368 / LINE TRANSFORMERS	L 178		7,106,085	644,511	6,461,574	
636 369 / SERVICES	L 179		1,829,475	93,896	1,735,579	
637 370 / ALL OTHER METERS	L 180		1,024,935	72,389	952,545	
638 AMI	L 181		3,677,845	130,747	3,547,097	
639 PRE-AMI (OREGON)	L 182		0	0	0	
640 PRE-AMI (IDAHO)	L 183		10,551,354	0	10,551,354	
641 371 / INSTALLATIONS ON CUSTOMER PREMISES	L 185		29,256	2,499	26,757	
642 373 / STREET LIGHTING SYSTEMS	L 186		179,433	8,878	170,555	
643 TOTAL DISTRIBUTION PLANT			44,878,651	1,947,066	42,931,585	



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DESCRIPTION	SOURCE	SYSTEM			OTHER
		ALLOC	TOTAL	RETAIL	
644 <b>TABLE 6-DEPRECIATION &amp; AMORTIZATION EXPENSE</b>					
645					
646 GENERAL PLANT			0	0	0
647 389 / LAND & LAND RIGHTS	L 191				
648 390 / STRUCTURES & IMPROVEMENTS	L 192		1,954,946	93,781	1,861,165
649 391 / OFFICE FURNITURE & EQUIPMENT	L 193		7,851,477	376,643	7,474,834
650 392 / TRANSPORTATION EQUIPMENT	L 194		222,415	10,669	211,745
651 393 / STORES EQUIPMENT	L 195		85,304	4,092	81,212
652 394 / TOOLS, SHOP & GARAGE EQUIPMENT	L 196		283,465	13,598	269,867
653 395 / LABORATORY EQUIPMENT	L 197		684,508	32,836	651,671
654 396 / POWER OPERATED EQUIPMENT	L 198		0	0	0
655 397 / COMMUNICATIONS EQUIPMENT	L 199		2,035,419	97,641	1,937,778
656 398 / MISCELLANEOUS EQUIPMENT	L 200		505,034	24,227	480,807
657 TOTAL GENERAL PLANT			13,622,568	653,488	12,969,080
658					
659 TOTAL DEPRECIATION EXPENSE			116,410,200	5,112,157	111,298,044
660					
661 DEPRECIATION ON DISALLOWED COSTS	L 113		(286,299)	(13,624)	(282,675)
662 TOTAL DEPRECIATION EXPENSE			116,113,901	5,098,532	111,015,369
663					
664 AMORTIZATION EXPENSE					
665 INTANGIBLE PLANT	L 113		7,231,531	332,515	6,899,015
666 HYDRAULIC PRODUCTION	L 117		0	0	0
667 ADJUSTMENTS, GAINS & LOSSES	L 113		(22,723)	(1,045)	(21,678)
668 TOTAL AMORTIZATION EXPENSE			7,208,808	331,470	6,877,337
669					
670 TOTAL DEPRECIATION & AMORTIZATION EXP			123,322,709	5,430,003	117,892,706

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671	DESCRIPTION	SOURCE	TOTAL	OREGON		
				ALLOC/	RETAIL	OTHER
672	TABLE 7-TAXES OTHER THAN INCOME TAXES		SYSTEM			
672	TAXES OTHER THAN INCOME					
673	FEDERAL TAXES					
674	FICA	LABOR	0	0	0	0
675	FUTA	LABOR	0	0	0	0
676	LESS PAYROLL DEDUCTION	LABOR	0	0	0	0
677						
678	STATE TAXES					
679	AD VALOREM TAXES					
680	JIM BRIDGER STATION	L 116	1,412,547	61,213	1,351,334	
681	VALMY	L 116	1,281,838	55,549	1,226,290	
682	BOARDMAN	L 116	308,283	13,360	294,924	
683	OTHER-PRODUCTION PLANT	L 120	4,633,668	200,801	4,432,868	
684	OTHER-TRANSMISSION PLANT	L 158	5,403,916	234,752	5,169,164	
685	OTHER-DISTRIBUTION PLANT	L 188	8,528,002	483,067	8,044,935	
686	OTHER-GENERAL PLANT	L 202	1,364,526	65,458	1,299,068	
687	SUB-TOTAL		22,932,783	1,114,199	21,818,584	
688						
689	LICENSES - HYDRO PROJECTS	L 117	4,830	209	4,620	
690						
691	REGULATORY COMMISSION FEES					
692	STATE OF IDAHO	CIDA	1,837,184	0	1,837,184	
693	STATE OF OREGON	CODA	140,942	140,942	0	
694	STATE OF NEVADA	D11	0	0	0	
695						
696	FRANCHISE TAXES					
697	STATE OF OREGON	CODA	680,159	680,159	0	
698	STATE OF NEVADA	D11	0	0	0	
699						
700	OTHER STATE TAXES					
701	UNEMPLOYMENT TAXES	LABOR	0	0	0	
702	HYDRO GENERATION KWH TAX	E10	1,732,697	80,174	1,652,523	
703	IRRIGATION-PIC	E10	303,932	14,063	289,869	
704						
705	TOTAL TAXES OTHER THAN INCOME		27,632,526	2,029,747	25,602,779	
706						

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	DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
707	<b>TABLE 8-REGULATORY DEBITS &amp; CREDITS</b>				
708	REGULATORY DEBITS/CREDITS				
709	STATE OF IDAHO	CIDA	0	0	0
710	STATE OF OREGON	CODA	27,757	27,757	0
711					
712	TOTAL REGULATORY DEBITS/CREDITS		27,757	27,757	0
713					
714					

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DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
715 <b>TABLE 9-INCOME TAXES</b>				
716				
717 410/411 NET PROVISION FOR DEFERRED INCOME TAXES		45,323,566	2,174,216	43,149,350
718 ACCOUNT #282 - RELATED	P101P	(5,747,109)	(256,972)	(5,490,137)
719 ACCOUNTS #190 & #283 - RELATED	L 746	39,576,457	1,917,244	37,659,213
720 TOTAL NET PROVISION FOR DEFERRED INCOME TAXES				
721				
722 411.4 - INVESTMENT TAX CREDIT ADJUSTMENT	P101P	(470,989)	(22,594)	(448,395)
723				
724 SUMMARY OF INCOME TAXES				
725				
726 TOTAL FEDERAL INCOME TAX		(6,924,112)	(549,346)	(6,374,766)
727				
728 STATE INCOME TAX		2,346,112	72,380	2,273,732
729 STATE OF IDAHO		(68,768)	(5,341)	(63,427)
730 STATE OF OREGON		(7,313)	(1,032)	(6,282)
731 OTHER STATES		2,270,031	66,007	2,204,023
732 TOTAL STATE INCOME TAXES				

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DESCRIPTION	SOURCE	TOTAL SYSTEM		OREGON	
		ALLOC/	OTHER	RETAIL	OTHER
<b>TABLE 10-CALCULATION OF FEDERAL INCOME TAX</b>					
734 OPERATING REVENUES		1,003,453,175		46,776,951	956,676,224
735					
736 OPERATING EXPENSES					
737 OPERATION & MAINTENANCE		684,766,241		31,790,864	652,975,377
738 DEPRECIATION EXPENSE		116,113,901		5,098,532	111,015,369
739 AMORTIZATION OF LIMITED TERM PLANT		7,208,808		331,470	6,877,337
740 TAXES OTHER THAN INCOME		27,632,526		2,029,747	25,602,779
741 REGULATORY DEBITS/CREDITS		27,757		27,757	0
742 TOTAL OPERATING EXPENSES		835,749,232		39,278,370	796,470,862
743					
744 BOOK-TAX ADJUSTMENT	L 742	0		0	0
745					
746 INCOME BEFORE TAX ADJUSTMENTS		167,703,943		7,498,580	160,205,362
747					
748 INCOME STATEMENT ADJUSTMENTS					
749 INTEREST EXPENSE SYNCHRONIZATION	L 353	84,514,916		4,120,543	80,394,373
750					
751 NET OPERATING INCOME BEFORE TAXES		83,189,027		3,378,037	79,810,990
752					
753 ALLOWANCE FOR AFUDC	P101P	0		0	0
754 FEDERAL INCOME TAX ADJUSTMENTS - PLANT	P101P	(116,297,982)		(5,578,928)	(110,719,054)
755 FEDERAL INCOME TAX ADJUSTMENTS - OTHER	L 746	15,595,809		697,339	14,898,470
756					
757 NET OPER INCOME BEFORE STATE INCOME TAXES		(17,513,146)		(1,503,552)	(16,009,594)
758					
759 TOTAL STATE INCOME TAXES (ALLOWED)	L 789+790+812+813+825+	2,270,031		66,007	2,204,023
760					
761 TOTAL FEDERAL TAXABLE INCOME		(19,783,177)		(1,569,560)	(18,213,617)
762					
763 FEDERAL TAX AT 35 PERCENT: ORDERED EFF. RATE	@ 35.00%	(6,924,112)		(549,346)	(6,374,766)
764 ADD : TAX DEFICIENCY PAYMENT	L 763	0		0	0
765 PRIOR YEARS' TAX ADJUSTMENT	L 763	0		0	0
766					
767 TOTAL FEDERAL INCOME TAX		(6,924,112)		(549,346)	(6,374,766)

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DESCRIPTION	SOURCE	SYSTEM	OREGON	
			RETAIL	OTHER
<b>TABLE 11-OREGON STATE INCOME TAX</b>				
769				
770 NET OPERATING INCOME BEFORE TAXES - OREGON	L 751	83,189,027	3,378,037	79,810,990
771				
772 ALLOWANCE FOR AFUDC	P101P	0	0	0
773 STATE INCOME TAX ADJUSTMENTS - PLANT	P101P	(116,297,982)	(5,578,928)	(110,719,054)
774 STATE INCOME TAX ADJUSTMENTS - OTHER	L 746	15,595,809	697,339	14,898,470
775 ADD: MFG DEDUCTION NOT ALLOWED	L 746	0	0	0
776				
777 TOTAL STATE INCOME TAX ADJUSTMENTS - OREGON		(100,702,173)	(4,881,590)	(95,820,583)
778				
779 INCOME SUBJECT TO OREGON TAX		(17,513,146)	(1,503,552)	(16,009,594)
780				
781 IERCO TAXABLE INCOME	E10	10,200,000	471,969	9,728,031
782 BONUS DEPRECIATION & OTHER OREGON ADJ	P101P	(15,609,404)	(748,798)	(14,860,606)
783				
784 TOTAL STATE TAXABLE INCOME - OREGON		(22,922,550)	(1,780,381)	(21,142,169)
785				
786 OREGON TAX AT 0.3 PERCENT: ORDERED EFF. RATE @ 0.30%		(68,768)	(5,341)	(63,427)
787 LESS: INVESTMENT TAX CREDIT	P101P	0	0	0
788				
789 STATE INCOME TAX ALLOWED - OREGON		(68,768)	(5,341)	(63,427)
790 ADD: TAX DEFICIENCY PAYMENT	L 786	0	0	0
791 PRIOR YEARS' TAX ADJUSTMENT	L 786	0	0	0
792				
793 STATE INCOME TAX PAID - OREGON		(68,768)	(5,341)	(63,427)
794				

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**TABLE 12-IDAHO STATE INCOME TAX**

DESCRIPTION	SOURCE	SYSTEM	OREGON		OTHER
			ALLOC/	RETAIL	
795 NET OPERATING INCOME BEFORE TAXES - IDAHO	L 751	83,189,027	3,378,037	79,810,990	
796 ALLOWANCE FOR AFUDC	P101P	0	0	0	
797 STATE INCOME TAX ADJUSTMENTS - PLANT	P101P	(116,287,982)	(5,578,928)	(110,719,054)	
798 STATE INCOME TAX ADJUSTMENTS - OTHER	L 746	15,595,809	697,339	14,898,470	
800 INCOME SUBJECT TO IDAHO TAX		(17,513,146)	(1,503,552)	(16,009,594)	
801 IERCO TAXABLE INCOME	E10	10,200,000	471,969	9,728,031	
802 BONUS DEPRECIATION ADJUSTMENT	P101P	96,577,023	4,632,894	91,944,129	
803 TOTAL STATE TAXABLE INCOME - IDAHO		89,263,877	3,601,312	85,662,566	
804 IDAHO TAX AT 5.9 PERCENT: ORDERED EFF. RATE	@ 5.90%	5,266,569	212,477	5,054,091	
805 LESS: INVESTMENT TAX CREDIT	P101P	2,920,457	140,097	2,780,360	
806 STATE INCOME TAX ALLOWED - IDAHO		2,346,112	72,380	2,273,732	
807 ADD: TAX DEFICIENCY PAYMENT	L 809	0	0	0	
808 PRIOR YEARS' TAX ADJUSTMENT	L 809	0	0	0	
809 STATE INCOME TAX PAID - IDAHO		2,346,112	72,380	2,273,732	
810 OTHER STATE INCOME TAX					
811 INCOME SUBJECT TO TAX		(17,513,146)	(1,503,552)	(16,009,594)	
812 IERCO TAXABLE INCOME	E10	10,200,000	471,969	9,728,031	
813 BONUS DEPRECIATION ADJUSTMENT	P101P	0	0	0	
814 TOTAL TAXABLE INCOME-OTHER STATES		(7,313,146)	(1,031,583)	(6,281,563)	
815 OTHER TAX AT 0.1 PERCENT		(7,313)	(1,032)	(6,282)	
816 ADD: TAX DEFICIENCY PAYMENT	L 815	0	0	0	
817 PRIOR YEARS' TAX ADJUSTMENT	L 815	0	0	0	
818 OTHER STATES' INCOME TAX PAID		(7,313)	(1,032)	(6,282)	

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DESCRIPTION	SOURCE	SYSTEM		OREGON RETAIL	OTHER
		TOTAL	ALLOC/		
<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>					
829 STEAM POWER GENERATION					
830 OPERATION					
831 500 / SUPERVISION & ENGINEERING	L 833-843	251,120		10,882	240,238
832 501 / FUEL	D10	0		0	0
833 502 / STEAM EXPENSES					
834 LABOR	D10	0		0	0
835 OTHER	D10	0		0	0
836 TOTAL ACCOUNT 502		0		0	0
837 505 / ELECTRIC EXPENSES					
838 LABOR	D10	0		0	0
839 OTHER	D10	0		0	0
840 TOTAL ACCOUNT 505		0		0	0
841 506 / MISCELLANEOUS EXPENSES	D10	25,816		1,119	24,697
842 507 / RENTS	D10	0		0	0
843 STEAM OPERATION EXPENSES					
844 LABOR		276,936		12,001	264,935
845 OTHER					
846 MAINTENANCE					
847 510 / SUPERVISION & ENGINEERING	L 848-857	0		0	0
848 511 / STRUCTURES	D10	0		0	0
849 512 / BOILER PLANT					
850 LABOR	D10	0		0	0
851 OTHER	D10	0		0	0
852 TOTAL ACCOUNT 512		0		0	0
853 513 / ELECTRIC PLANT					
854 LABOR	D10	0		0	0
855 OTHER	D10	0		0	0
856 TOTAL ACCOUNT 513		0		0	0
857 514 / MISCELLANEOUS STEAM PLANT	D10	0		0	0
858 STEAM MAINTENANCE EXPENSES					
859 TOTAL STEAM GENERATION EXPENSES		276,936		12,001	264,935
860					



**IDAHO POWER COMPANY**  
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DESCRIPTION	SOURCE ALLOC/	SYSTEM TOTAL	OREGON	
			RETAIL	OTHER
<b>861 TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>				
862 HYDRAULIC POWER GENERATION				
863 OPERATION				
864 535 / SUPERVISION & ENGINEERING	L 865-872	4,138,379	180,160	3,958,219
865 536 / WATER FOR POWER	E10	557,584	25,800	531,784
866 537 / HYDRAULIC EXPENSES	D10	4,669,049	202,334	4,466,715
867 538 / ELECTRIC EXPENSES				
868 LABOR	D10	1,133,916	49,138	1,084,778
869 OTHER	D10	0	0	0
870 TOTAL ACCOUNT 538		1,133,916	49,138	1,084,778
871 539 / MISCELLANEOUS EXPENSES	D10	1,878,098	81,388	1,796,710
872 540 / RENTS	D10	0	0	0
873 HYDRAULIC OPERATION EXPENSES		12,377,026	538,820	11,838,206
874				
875 MAINTENANCE				
876 541 / SUPERVISION & ENGINEERING	L 877-883	1,632,395	70,740	1,561,655
877 542 / STRUCTURES	D10	715,498	31,006	684,492
878 543 / RESERVOIRS, DAMS & WATERWAYS	D10	632,240	27,398	604,842
879 544 / ELECTRIC PLANT				
880 LABOR	D10	1,989,149	86,200	1,902,949
881 OTHER	D10	0	0	0
882 TOTAL ACCOUNT 544		1,989,149	86,200	1,902,949
883 545 / MISCELLANEOUS HYDRAULIC PLANT	D10	1,934,114	83,815	1,850,299
884 HYDRAULIC MAINTENANCE EXPENSES		6,903,396	299,160	6,604,236
885 TOTAL HYDRAULIC GENERATION EXPENSES		19,280,422	837,980	18,442,442

**IDAHO POWER COMPANY**  
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DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON		OTHER
			ALLOC/	RETAIL	
<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>					
886 OTHER POWER GENERATION					
888 OPERATION					
889 546 / SUPERVISION & ENGINEERING	L 890-896	286,810	12,429	274,381	0
890 547 / FUEL	E10	0	0	0	0
891 548 / GENERATING EXPENSES					
892 LABOR	D10	327,712	14,201	313,511	0
893 OTHER	D10	0	0	0	0
894 TOTAL ACCOUNT 548		327,712	14,201	313,511	0
895 549 / MISCELLANEOUS EXPENSES	D10	323,105	14,002	309,103	0
896 550 / RENTS	D10	0	0	0	0
897 OTHER POWER OPER EXPENSES		937,627	40,632	896,995	0
898					
899 MAINTENANCE					
900 551 / SUPERVISION & ENGINEERING	L 901-906	0	0	0	0
901 552 / STRUCTURES	D10	127,875	5,541	122,334	0
902 553 / GENERATING & ELECTRIC PLANT					
903 LABOR	D10	88,691	3,843	84,848	0
904 OTHER	D10	0	0	0	0
905 TOTAL ACCOUNT 553		88,691	3,843	84,848	0
906 554 / MISCELLANEOUS EXPENSES	D10	355,196	15,392	339,804	0
907 OTHER POWER MAINT EXPENSES		571,762	24,777	546,985	0
908 TOTAL OTHER POWER GENERATION EXP		1,509,389	65,410	1,443,979	0
909					
910 OTHER POWER SUPPLY EXPENSE					
911 555.0 / PURCHASED POWER	E10	0	0	0	0
912 555.1 / COGENERATION & SMALL POWER PROD					
913 CAPACITY RELATED	D10	0	0	0	0
914 ENERGY RELATED	E10	0	0	0	0
915 TOTAL 555.1/CSPP		0	0	0	0
916 555/TOTAL		0	0	0	0
917 556 / LOAD CONTROL & DISPATCHING EXPENSES	D10	0	0	0	0
918 557 / OTHER EXPENSES	D10	1,969,127	85,332	1,883,795	0
919 TOTAL OTHER POWER SUPPLY EXPENSES		1,969,127	85,332	1,883,795	0
920					
921 TOTAL PRODUCTION EXPENSES		23,035,874	1,000,724	22,035,150	0

**IDAHO POWER COMPANY  
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DESCRIPTION	SOURCE	OREGON		OTHER
		RETAIL	SYSTEM	
<b>922 TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>				
923 TRANSMISSION EXPENSES				
924 OPERATION				
925 560 / SUPERVISION & ENGINEERING	L 158	81,496	1,876,009	1,794,513
926 561 / LOAD DISPATCHING	D12	112,949	2,606,404	2,493,455
927 562 / STATION EXPENSES	L 136	61,062	1,406,018	1,344,956
928 563 / OVERHEAD LINE EXPENSES	L 141+146+151	14,158	325,684	311,526
929 565 / TRANSMISSION OF ELECTRICITY BY OTHERS	E10	0	0	0
930 566 / MISCELLANEOUS EXPENSES	L 523	1,317	29,797	28,480
931 567 / RENTS	L 158	0	0	0
932 TOTAL TRANSMISSION OPERATION		270,981	6,243,912	5,972,931
933				
934 MAINTENANCE				
935 568 / SUPERVISION & ENGINEERING	L 158	5,561	128,017	122,456
936 569 / STRUCTURES	L 131	13,808	318,561	304,753
937 570 / STATION EQUIPMENT	L 136	84,184	1,938,436	1,854,252
938 571 / OVERHEAD LINES	L 141+146+151	36,303	835,101	798,798
939 573 / MISCELLANEOUS PLANT	L 158	0	0	0
940 TOTAL TRANSMISSION MAINTENANCE		139,856	3,220,115	3,080,259
941				
942 TOTAL TRANSMISSION EXPENSES		410,837	9,464,027	9,053,190

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DESCRIPTION	SOURCE	SYSTEM	OREGON		OTHER
			ALLOC	RETAIL	
<b>943 TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>					
944 DISTRIBUTION EXPENSES					
945 OPERATION					
946 580 / SUPERVISION & ENGINEERING	L 188	2,826,824	160,125	2,666,699	
947 581 / LOAD DISPATCHING	D60	2,940,004	120,524	2,819,480	
948 582 / STATION EXPENSES	L 172	841,162	25,191	815,971	
949 583 / OVERHEAD LINE EXPENSES	L 174+175	2,454,103	169,309	2,284,794	
950 584 / UNDERGROUND LINE EXPENSES	L 176+177	640,628	10,352	630,276	
951 585 / STREET LIGHTING & SIGNAL SYSTEMS	L 186	63,072	3,121	59,951	
952 586 / METER EXPENSES	L 180:183	3,037,247	81,942	2,955,305	
953 587 / CUSTOMER INSTALLATIONS EXPENSE	L 185	1,047,805	89,502	958,303	
954 588 / MISCELLANEOUS EXPENSES	L 550	3,092,742	163,427	2,929,315	
955 589 / RENTS	L 188	107	6	101	
956 TOTAL DISTRIBUTION OPERATION		16,943,694	823,498	16,120,196	
957					
958 MAINTENANCE					
959 590 / SUPERVISION & ENGINEERING	L 188	303,700	17,203	286,497	
960 591 / STRUCTURES	L 168	0	0	0	
961 592 / STATION EQUIPMENT	L 172	2,190,252	65,593	2,124,659	
962 593 / OVERHEAD LINES	L 174+175	5,129,594	353,892	4,775,702	
963 594 / UNDERGROUND LINES	L 176+177	645,314	10,428	634,886	
964 595 / LINE TRANSFORMERS	L 178	24,820	2,251	22,569	
965 596 / STREET LIGHTING & SIGNAL SYSTEMS	L 186	327,168	16,188	310,980	
966 597 / METERS	L 180:183	511,932	13,811	498,121	
967 598 / MISCELLANEOUS PLANT	L 188	107,136	6,069	101,067	
968 TOTAL DISTRIBUTION MAINTENANCE		9,239,916	485,435	8,754,481	
969 TOTAL DISTRIBUTION EXPENSES		26,183,610	1,308,933	24,874,677	
970					
971 CUSTOMER ACCOUNTING EXPENSES					
972 901 / SUPERVISION	L 973	359,608	25,011	334,597	
973 902 / METER READING	CW902	2,269,828	157,869	2,111,959	
974 903 / CUSTOMER RECORDS & COLLECTIONS	CW903	6,906,743	258,465	6,648,278	
975 904 / UNCOLLECTIBLE ACCOUNTS	CW904	0	0	0	
976 905 / MISC EXPENSES	L 973-975	0	0	0	
977 TOTAL CUSTOMER ACCOUNTING EXPENSES		9,536,179	441,344	9,094,835	
978					
979 CUSTOMER SERVICES & INFORMATION EXPENSES					
980 907 / SUPERVISION	L 984	279,335	10,239	269,096	
981 908 / CUSTOMER ASSISTANCE	L 562	3,632,577	133,147	3,499,430	
982 908 / ENERGY EFFICIENCY RIDER	CIDA	0	0	0	
983 909 / INFORMATION & INSTRUCTIONAL	L 566	0	0	0	
984 910 / MISCELLANEOUS EXPENSES	L 981+983	508,430	18,636	489,794	
985 TOTAL CUST SERV & INFORMATN EXPENSES		4,420,342	162,022	4,258,320	

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DESCRIPTION	SOURCE	SYSTEM		
		ALLOC/	TOTAL	OTHER
<b>TABLE 13-DEVELOPMENT OF LABOR RELATED ALLOCATOR</b>				
986 ADMINISTRATIVE & GENERAL EXPENSES	PTDCAS		40,893,203	
987 ADMINISTRATIVE & GENERAL SALARIES	PTDCAS		194,129	
988 920 / OFFICE SUPPLIES	PTDCAS		0	39,022,013
989 922 / ADMIN & GENERAL EXPENSES TRANSFERRED-	PTDCAS		0	185,246
990 923 / OUTSIDE SERVICES	PTDCAS		0	0
991 924 / PROPERTY INSURANCE				
992 PRODUCTION - STEAM	L 116		0	0
993 ALL RISK & MISCELLANEOUS	P110P		231,444	221,525
994 TOTAL ACCOUNT 924			231,444	221,525
995 925 / INJURIES & DAMAGES	LABOR		162,751	155,305
996 926 / EMPLOYEE PENSIONS & BENEFITS	LABOR		0	0
997 927 / FRANCHISE REQUIREMENTS	CIDA		0	0
998 928 / REGULATORY COMMISSION EXPENSES				
999 928.101 / FERC ADMIN ASSESS & SECURITIES				
1000 CAPACITY RELATED	D10		0	0
1001 ENERGY RELATED	E10		0	0
1002 928.101 / FERC ORDER 472	E99		0	0
1003 928.101 / FERC MISCELLANEOUS	L RESREV		0	0
1004 928.102 FERC RATE CASE	RESREV		0	0
1005 928.104 / FERC OREGON HYDRO	RESREV		0	0
1006 SEC EXPENSES	L 204		0	0
1007 928.202 / IDAHO PUC -RATE CASE	CIDA		0	0
1008 928.203 / IDAHO PUC - OTHER	CIDA		0	0
1009 928.301 / OREGON PUC - FILING FEES	CODA		0	0
1010 928.302 / OREGON PUC - RATE CASE	CODA		0	0
1011 928.303 / OREGON PUC - OTHER	CODA		0	0
1012 IPC/PUC JSS TRUE-UP ADJ	PTD		0	0
1013 TOTAL ACCOUNT 928			0	0
1014 929 / DUPLICATE CHARGES	SUBEX		0	0
1015 930.1 / GENERAL ADVERTISING	RELAB		0	0
1016 930.2 / MISCELLANEOUS EXPENSES	PTDCAS		0	0
1017 931 / RENTS	L 202		132,751	126,383
1018 TOTAL ADM & GEN OPERATION			41,614,278	39,710,472
1019 PLUS:				
1020 935 / GENERAL PLANT MAINTENANCE	P9908		1,072,390	1,020,946
1021 416 / MERCHANDISING EXPENSE	E10		0	0
1022 TOTAL OPER & MAINT EXPENSES			115,326,700	110,047,590
1023 <b>TOTAL LABOR - RATIO (%)</b>			100.00%	95.42%
1024				
1025				

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DESCRIPTION	SOURCE	OREGON	
		ALLOC/ TOTAL	RETAIL OTHER
<b>TABLE 14-ALLOCATION FACTORS</b>			
1026			
1027			
1028	CAPACITY RELATED KW		
1029	PRODUCTION RELATED COINCIDENT PEAKS @ GEN D10	2,401,942	104,089
1030	SYSTEM TRANSMISSION SERVICE @ GENERATION I D11	2,401,942	104,089
1031	RETAIL TRANSMISSION SERVICE @ GENERATION LEV1 D12	2,401,942	104,089
1032	DISTRIBUTION SERVICE @ GENERATION LEVEL D60	2,272,090	93,143
1033			
1034	ENERGY RELATED MWH		
1035	GENERATION LEVEL (PSP) E10	15,324,181	709,073
1036	CUSTOMER LEVEL E99	13,957,948	650,666
1037			
1038	CUSTOMER RELATED FACTORS		
1039	369-DIRECT ASSIGNMENT DA369	57,124,593	2,931,869
1040	370-DIRECT ASSIGNMENT DA370	2,032,402	143,545
1041	370-AMI METERS DA370A	53,969,519	1,918,616
1042	902-CUSTOMER WEIGHTED CW902	4,026,937	280,077
1043	903-CUSTOMER WEIGHTED CW903	12,988,730	486,065
1044	904-CUSTOMER WEIGHTED CW904	5,029,157	172,260
1045	909-DIRECT ASSIGN-AVG.NO.CUST. DA909	489,569	18,310

**IDAHO POWER COMPANY**  
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	DESCRIPTION	SOURCE	TOTAL	OREGON	OTHER
		ALLOC/	SYSTEM	RETAIL	
		ALLOCC/			
1046	<b>TABLE 14-ALLOCATION FACTORS</b>				
1047					
1048	DIRECT ASSIGNMENTS		23,565,979	27,651	23,538,328
1049	252-CUSTOMER ADVANCES	DA252		792	0
1050	350-LAND & LAND RIGHTS	DA350	792	658	0
1051	352-STRUCTURES & IMPROVEMENTS	DA352	658	36,494	37,550
1052	353-STATION EQUIPMENT	DA353	74,044	0	0
1053	354-TOWERS & FIXTURES	DA354	0	33,630	434
1054	355-POLES & FIXTURES	DA355	34,064	26,534	1,687
1055	356-OVERHEAD CONDUCTORS & DEVICES	DA356	28,221	0	0
1056	359-ROADS & TRAILS	DA359	0	135,618	4,593,480
1057	360LAND & LAND RIGHTS-DA	DA360	4,729,098	305	89,641
1058	360LAND & LAND RIGHTS-CIAC	DA360C	89,946	1,116,186	27,537,335
1059	361-STRUCTURES & IMPROVEMENTS-DA	DA361	28,663,521	30,890	6,098,177
1060	361-STRUCTURES & IMPROVEMENTS-CIAC	DA361C	6,129,067	6,074,327	176,519,841
1061	362-STATION EQUIPMENT-DA	DA362	182,594,168	91,357	24,652,200
1062	362-STATION EQUIPMENT-CIAC	DA362C	24,743,557	16,309,188	204,850,986
1063	364-POLES, TOWERS & FIXTURES-NET	DA364	221,160,174	7,139,900	111,557,339
1064	365-OVERHEAD CONDUCTORS & DEVICES-NET	DA365	118,697,239	675,461	47,583,403
1065	366-UNDERGROUND CONDUIT-NET	DA366	48,258,864	3,145,662	185,164,954
1066	367-UNDERGROUND CONDUCTORS & DEVICES-NET	DA367	188,310,616	37,014,573	371,091,266
1067	368-LINE TRANSFORMERS-NET	DA368	408,105,839	230,744	2,470,588
1068	371-INSTALLATIONS ON CUSTOMER PREMISES-NET	DA371	2,701,332	212,828	4,088,561
1069	373-STREET LIGHTING SYSTEMS-NET	DA373	4,301,389	77,330	3,455,502
1070	451-REVENUE - MISCELLANEOUS SERVICE	DA451	3,532,832	358,513	5,954,303
1071	454-REVENUE - FACILITIES CHARGE	DA454	6,312,816	1	0
1072	454-REVENUE - MISCELLANEOUS	DA454MISC	1	210,343	5,610,188
1073	908-OTHER CUSTOMER ASSISTANCE	DA908	5,820,531	39,873,591	812,166,191
1074	440-RETAIL SALES REVENUE	RETREV	852,039,782	0	0
1075	447-WHOLESALE SALES REVENUE	RESREV	0	0	309,185
1076	456-REVENUE - STANDBY SERVICE	DASTNB	309,185	0	1
1077	440-REVENUE OFFSET FOR PLANT ADDITIONS	DAREV	1	0	1
1078	IDAHO	CIDA	1	0	1
1079	OREGON	CODA	1	1	0
1080	NET TO GROSS TAX MULTIPLIER	DA990	1,642	1,642	1,642

**IDAHO POWER COMPANY  
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	DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
1081	<b>TABLE 14-ALLOCATION FACTORS</b>				
1082					
1083	INTERNALLY DEVELOPED ALLOCATION FACTORS				
1084	PLANT - PROD,TRANS&DIST	PTD	4,110,626,321	197,190,771	3,913,435,550
1085	LAB - PROD,TRANS,DIST,CUST ACCT&CSIS	PTDCAS	72,640,032	3,323,860	69,316,172
1086	PLANT - HYDRO,OTHER,TSUBS,DSUBS&GP	P110P	1,780,556,894	76,311,643	1,704,245,251
1087	PLANT - GEN PLT (390,391,397&398)	P3908	162,147,418	7,778,370	154,369,047
1088	PLANT - PROD,TRANS,DIST&GEN	P101P	4,374,320,369	209,840,432	4,164,479,936
1089	O&M - PROD,TRANS,DIST,CUST ACCT&CSIS	SUBEX	566,918,296	26,053,730	540,864,566
1090	LAB - PROD,TRANS,DIST,CUST ACCT&CSIS	RELAB	1,780,556,894	76,311,643	1,704,245,251
1091	LAB - ALL LABOR WITHOUT 925-6 "CIRC"	LABOR	113,958,808	5,213,852	108,744,956



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DESCRIPTION	SOURCE	SYSTEM	OREGON		OTHER
			ALLOC	RETAIL	
1092 <b>TABLE 15-ALLOCATION FACTORS-RATIOS</b>					
1093					
1094 CAPACITY RELATED KW					
1095 PRODUCTION RELATED COINCIDENT PEAKS @ GEN	D10	100.00%		4.33%	95.67%
1096 SYSTEM TRANSMISSION SERVICE @ GENERATION I	D11	100.00%		4.33%	95.67%
1097 RETAIL TRANSMISSION SERVICE @ GENERATION LEV1 D12		100.00%		4.33%	95.67%
1098 DISTRIBUTION SERVICE @ GENERATION LEVEL	D60	100.00%		4.10%	95.90%
1099					
1100 ENERGY RELATED MWH					
1101 GENERATION LEVEL (PSP)	E10	100.00%		4.63%	95.37%
1102 CUSTOMER LEVEL	E99	100.00%		4.66%	95.34%
1103					
1104 CUSTOMER RELATED FACTORS					
1105 369-DIRECT ASSIGNMENT	DA369	100.00%		5.13%	94.87%
1106 370-DIRECT ASSIGNMENT	DA370	100.00%		7.06%	92.94%
1107 370-AMI METERS	DA370A	100.00%		3.56%	96.45%
1108 902-CUSTOMER WEIGHTED	CW902	100.00%		6.96%	93.04%
1109 903-CUSTOMER WEIGHTED	CW903	100.00%		3.74%	96.26%
1110 904-CUSTOMER WEIGHTED	CW904	100.00%		3.43%	96.57%
1111 909-DIRECT ASSIGN-AVG.NO.CUST.	DA909	100.00%		3.74%	96.26%

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	DESCRIPTION	SOURCE ALLOC	TOTAL SYSTEM	OREGON RETAIL	OTHER
1112	TABLE 15-ALLOCATION FACTORS-RATIOS				
1113					
1114	DIRECT ASSIGNMENTS				
1115	252-CUSTOMER ADVANCES	DA252	100.00%	0.12%	99.88%
1116	350-LAND & LAND RIGHTS	DA350	100.00%	100.00%	0.00%
1117	352-STRUCTURES & IMPROVEMENTS	DA352	100.00%	100.00%	0.00%
1118	353-STATION EQUIPMENT	DA353	100.00%	49.29%	50.71%
1119	354-TOWERS & FIXTURES	DA354	#DIV/0!	#DIV/0!	#DIV/0!
1120	355-POLES & FIXTURES	DA355	100.00%	98.73%	1.27%
1121	356-OVERHEAD CONDUCTORS & DEVICES	DA356	100.00%	94.02%	5.98%
1122	359-ROADS & TRAILS	DA359	#DIV/0!	#DIV/0!	#DIV/0!
1123	360LAND & LAND RIGHTS-DA	DA360	100.00%	2.87%	97.13%
1124	360LAND & LAND RIGHTS-CIAC	DA360C	100.00%	0.34%	99.66%
1125	361-STRUCTURES & IMPROVEMENTS-DA	DA361	100.00%	3.90%	96.10%
1126	361-STRUCTURES & IMPROVEMENTS-CIAC	DA361C	100.00%	0.50%	99.50%
1127	362-STATION EQUIPMENT-DA	DA362	100.00%	3.33%	96.67%
1128	362-STATION EQUIPMENT-CIAC	DA362C	100.00%	0.37%	99.63%
1129	364-POLES, TOWERS & FIXTURES-NET	DA364	100.00%	7.37%	92.63%
1130	365-OVERHEAD CONDUCTORS & DEVICES-NET	DA365	100.00%	6.02%	93.98%
1131	366-UNDERGROUND CONDUIT-NET	DA366	100.00%	1.40%	98.60%
1132	367-UNDERGROUND CONDUCTORS & DEVICES-NET	DA367	100.00%	1.67%	98.33%
1133	368-LINE TRANSFORMERS-NET	DA368	100.00%	9.07%	90.93%
1134	371-INSTALLATIONS ON CUSTOMER PREMISES-NET	DA371	100.00%	8.54%	91.46%
1135	373-STREET LIGHTING SYSTEMS-NET	DA373	100.00%	4.95%	95.05%
1136	451-REVENUE - MISCELLANEOUS SERVICE	DA451	100.00%	2.19%	97.81%
1137	454-REVENUE - FACILITIES CHARGE	DA454	100.00%	5.68%	94.32%
1138	454-REVENUE - MISCELLANEOUS	DA454MISC	100.00%	100.00%	0.00%
1139	908-OTHER CUSTOMER ASSISTANCE	DA908	100.00%	3.61%	96.39%
1140	440-RETAIL SALES REVENUE	RETREV	100.00%	4.68%	95.32%
1141	447-WHOLESALE SALES REVENUE	RESREV	#DIV/0!	#DIV/0!	#DIV/0!
1142	456-REVENUE - STANDBY SERVICE	DASTNBY	100.00%	0.00%	100.00%
1143	440-REVENUE OFFSET FOR PLANT ADDITIONS	DAREV	100.00%	0.00%	100.00%
1144	IDAHO	CIDA	100.00%	0.00%	0.00%
1145	OREGON	CODA	100.00%	100.00%	0.00%
1146	NET TO GROSS TAX MULTIPLIER	DA990	1.642	1.642	1.642

**IDAHO POWER COMPANY  
JURISDICTIONAL SEPARATION STUDY  
OREGON REVENUE REQUIREMENT  
FOR THE TEST YEAR ENDING DECEMBER 31, 2011**

	DESCRIPTION	SOURCE	TOTAL SYSTEM	OREGON RETAIL	OTHER
1147	TABLE 15-ALLOCATION FACTORS-RATIOS				
1148					
1149	INTERNALLY DEVELOPED ALLOCATION FACTORS				
1150	PLANT - PROD,TRANS&DIST	PTD	100.00%	4.80%	95.20%
1151	LAB - PROD,TRANS,DIST,CUST ACCT&CSIS	PTDCAS	100.00%	4.58%	95.42%
1152	PLANT - HYDRO,OTHER,TSUBS,DSUBS&GP	P110P	100.00%	4.29%	95.71%
1153	PLANT - GEN PLT (390,391,397&398)	P3908	100.00%	4.80%	95.20%
1154	PLANT - PROD,TRANS,DIST&GEN	P101P	100.00%	4.80%	95.20%
1155	O&M - PROD,TRANS,DIST,CUST ACCT&CSIS	SUBEX	100.00%	4.60%	95.40%
1156	LAB - PROD,TRANS,DIST,CUST ACCT&CSIS	RELAB	100.00%	4.29%	95.71%
1157	LAB - ALL LABOR WITHOUT 925-6 "CIRC"	LABOR	100.00%	4.58%	95.42%

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**  
**DIRECT TESTIMONY**  
**OF**  
**MATTHEW T. LARKIN**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Matthew T. Larkin and my business address is 1221 West Idaho Street,  
3 Boise, Idaho.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company ("Idaho Power" or "Company") as a  
6 Regulatory Analyst in the Regulatory Affairs Department.

7 **Q. Please describe your educational background.**

8 A. I received a Bachelor of Business Administration degree in Finance from the  
9 University of Oregon in 2007. In 2008, I earned a Master of Business Administration  
10 degree from the University of Oregon. I have also attended electric utility ratemaking  
11 courses including "The Basics: Practical Regulatory Training for the Electric  
12 Industry," a course offered through New Mexico State University's Center for Public  
13 Utilities, and Introduction to "Rate Design and Cost of Service Concepts and  
14 Techniques," presented by Electric Utilities Consultants, Inc.

15 **Q. Please describe your work experience with Idaho Power.**

16 A. I began employment with Idaho Power as a Regulatory Analyst in January 2009. As  
17 a Regulatory Analyst, I provide support for the Company's various regulatory  
18 activities, including regulatory reporting, financial analysis, and the development of  
19 various cost-related studies. During my time with the Company, I have assisted in  
20 the preparation of the Company's Oregon Results of Operations Report, retail  
21 revenue forecasts for regulatory filings, and a number of cost-of-service studies.

22 **Q. What is the scope of your testimony in this proceeding?**

23 A. My testimony will address the derivation of the Company's 2011 Test Year retail  
24 revenue forecast, the "functionalization" of the proposed Oregon jurisdictional  
25 revenue requirement provided to me by Ms. Kelley Noe, the 2011 Marginal Cost  
26

1 Analysis, and the proposed allocation of the Oregon jurisdictional revenue  
2 requirement.

3 **Q. Have you prepared any exhibits as part of your testimony?**

4 A. Yes. I have prepared the following seven exhibits as part of my testimony:

5 1. Exhibit 1001 describes the methodology used to develop the Oregon  
6 class-specific test year customer and energy forecasts

7 2. Exhibit 1002 is a summary of the 2011 Test Year retail revenue  
8 forecast

9 3. Exhibit 1003 presents the calculation of the 2011 Test Year retail  
10 revenue forecast

11 4. Exhibit 1004 presents the Company's functionalized revenue  
12 requirement

13 5. Exhibit 1005 is the 2011 Marginal Cost Analysis ("2011 Analysis")

14 6. Exhibit 1006 is a summary of marginal costs by customer class, the  
15 resulting revenue requirement allocation, and the class-specific unit costs

16 7. Exhibit 1007 details the Company's proposed revenue requirement  
17 allocation.

18 **I. 2011 TEST YEAR RETAIL REVENUE DERIVATION**

19 **Q. Please provide a brief description of the methodology used to determine test  
20 year retail revenues.**

21 A. Generally speaking, the Company's retail revenue forecast is derived by applying  
22 current base rates to forecasted test year billing components. These billing  
23 components are derived by applying historical relationships to the Company's  
24 customer and kilowatt-hour ("kWh") sales forecast.

25

26

1 **Q. Were the 2011 Test Year retail sales revenues developed using the same**  
2 **methodology applied in the Company's last general rate case, Docket No. UE**  
3 **213 ("2009 Rate Case")?**

4 A. Yes. With the exception of a minor change in the manner in which the demand-  
5 related billing determinants were developed-- which I will describe later in my  
6 testimony-- the methodology applied in this case is the same as that applied in the  
7 2009 Rate Case.

8 **Q. Please describe the customer and kWh sales forecast that serves as the basis**  
9 **for the 2011 Test Year retail revenue forecast.**

10 A. The 2011 Test Year customer and kWh sales forecast is based upon the Sales and  
11 Load Forecast prepared for the 2011 Integrated Resource Plan ("IRP") filed with the  
12 Commission in June 2011. Because the IRP Sales and Load Forecast is developed  
13 on a system-wide basis, an additional step must be taken to determine the class-  
14 specific customer and energy values by jurisdiction. Once the monthly sales  
15 estimates have been developed for each customer class, they must be further  
16 segmented to align with each class's rate structure.

17 The methodology used to develop the Oregon class-specific test year  
18 customer and energy values is outlined in the document Development of Sales  
19 Forecast for Revenue Calculation, as Exhibit 1001 to my testimony. The described  
20 forecasting methodology results in class customer counts and total kWh sales  
21 estimates for each month of the test period. As Exhibit 1001 states, the IRP Sales  
22 and Load Forecast has been modified for the purpose of this filing to exclude the  
23 new large load customer expected to begin taking service in the Company's Oregon  
24 jurisdiction in late 2011. While the inclusion of this large load is necessary for  
25 planning purposes, it is not appropriate to be included in the ratemaking process  
26

1 prior to the finalization of a contractual agreement between the Company and the  
2 new large load customer.

3 **Q. How were the 2011 Test Year kWh sales further segmented into the class-**  
4 **specific energy-related billing components?**

5 A. The first step in deriving energy-related billing components for the test year is to  
6 develop factors based on the most current complete calendar year of available  
7 historical data, which in this case is 2010. These historical factors represent the  
8 percentage of total kWh billed in each tier level of a class's rate structure. To  
9 illustrate, Small General Service customers taking service under Schedule 7 are  
10 billed according to a two-tiered structure with seasonal rate differentiation. Using the  
11 historical month of June 2010 as an example, actual tiered usage was recorded at  
12 the following levels for Schedule 7 customers in the Oregon jurisdiction:

<b>Usage Tier</b>	<b>June 2010 Schedule 7 Billing Components</b>
Summer, 0-500 kWh	202,487
Summer, Over 500 kWh	166,921
Non-Summer, 0-500 kWh	422,867
Non-Summer, Over 500 kWh	348,592
<b>Total Schedule 7 kWh Usage</b>	<b>1,140,867</b>

20 Based on the data above, historical factors for Schedule 7 customers for the  
21 month of June were calculated as follows:

<b>Usage Tier</b>	<b>June 2010 Schedule 7 Weighting Factors</b>
Summer, 0-500 kWh	17.75%
Summer, Over 500 kWh	14.63%



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Non-Summer, 0-500 kWh	37.06%
Non-Summer, Over 500 kWh	30.56%
<b>Total Schedule 7</b>	<b>100.00%</b>

This process is used to develop historical factors for all rate classes with tiered structures. Once a complete set of monthly factors has been developed for each applicable rate class, they are applied to monthly forecast kWh totals to derive the energy-related billing component forecast that aligns with each class’s current rate structure. Continuing with the illustration of Schedule 7 customers, the following table demonstrates the final step in determining test year energy-related billing components:

<b>Usage Tier</b>	<b>Historical June Weighting Factor</b>	<b>June 2011 Schedule 7 Billing Component Forecast (kWh)</b>
Summer, 0-500 kWh	17.75%	223,654
Summer, Over 500 kWh	14.63%	184,370
Non-Summer, 0-500 kWh	37.06%	467,073
Non-Summer, Over 500 kWh	30.56%	385,034
<b>Total Schedule 7 kWh Usage</b>	<b>100.00%</b>	<b>1,260,131</b>

- Q. How are demand-related billing components derived based on the kWh sales forecast?**
- A. The demand-related billing components consist of billing demand and basic load capacity (“BLC”) by month for each rate class. Both billing demand and BLC totals are forecasted by applying four-year average load factors to each month in the kWh sales forecast. Historical data from the most current available four calendar years is used to derive an average load factor by month for each rate class. These average

1 factors are then applied to monthly kWh sales figures to determine total forecasted  
2 billing demand and BLC by class for each month of the test period. The use of four-  
3 year average load factors is a departure from the methodology applied in the 2009  
4 Rate Case, which calculated load factors based on the most current available single  
5 year of data. This adjustment reduces the impact of fluctuations within a single year  
6 on the derivation of test year demand-related billing components. Once monthly  
7 totals have been developed, they are divided into the appropriate tiered rate  
8 structure (if applicable) utilizing historical factors in the same manner as kWh  
9 charges.

10 **Q. How are customer-related billing components derived based on the customer**  
11 **count forecast?**

12 A. The primary customer-related billing component in the retail revenue forecast is the  
13 service charge. Because the customer forecast reflects the expected number of  
14 customers under active Utility Service Agreements (“USA”) at the end of each  
15 forecast month, forecast values must be converted to reflect the expected number of  
16 service charges received throughout the corresponding month. To convert the USA  
17 forecast to an expected service charge count, historical factors are developed  
18 reflecting the relationship between the number of USAs at the end of each historical  
19 month and the number of service charges received during the corresponding month.  
20 These factors are then applied to the monthly customer forecast to develop a  
21 forecast of expected service charges by rate class for each month of the test year.

22 **Q. How are test year retail revenues calculated once the billing component**  
23 **forecast has been derived?**

24 A. Once the billing components have been forecasted by rate class, the most currently  
25 approved base rates are applied to the test year component values to derive monthly  
26 revenue forecasts for each rate class.

1 **Q. Have you prepared any exhibits that detail the calculations that were made to**  
2 **determine the Company's 2011 Test Year retail revenues?**

3 A. Yes. Exhibit 1002 provides a summary of forecasted 2011 Test Year retail revenues,  
4 and Exhibit 1003 details the calculations that were made to determine these  
5 revenues. Input data used in the forecast calculations can be found in my  
6 workpapers. As can be seen on page 4 of Exhibit 1002, the Company's 2011  
7 Oregon jurisdictional retail sales revenues are forecast to be \$39.9 million.

8 **II. FUNCTIONALIZATION OF REVENUE REQUIREMENT**

9 **Q. Please explain the meaning of functionalization.**

10 A. Before the Company's proposed revenue requirement can be divided among  
11 customer classes, costs must be functionalized — that is, identified with utility  
12 operating functions. Operating functions recognize the different roles played by the  
13 various facilities in the electric utility system. In the Company's accounts, these  
14 various roles are recognized to some degree, particularly in the recording of plant  
15 costs as generation-, transmission-, or distribution-related. However, this functional  
16 breakdown is not sufficiently detailed for cost-of-service purposes.

17 **Q. How are costs further segmented for cost-of-service purposes?**

18 A. For cost-of-service purposes, functionalized costs are further segmented or  
19 "classified" as energy-, demand- or customer-related. Energy-related costs are  
20 generally the variable costs associated with the operation of the generating plants,  
21 such as fuel. However, because the Company is heavily reliant on hydro generation,  
22 a portion of the hydro and thermal generating plant investment has been classified  
23 as energy-related according to the Company's system load factor. Demand-related  
24 costs are investments in generation, transmission, and distribution plant capacity and  
25 the associated operation and maintenance expenses necessary to accommodate the  
26 maximum demand imposed on the Company's system. Examples of customer

1 related costs are the plant investments and expenses that are associated with  
2 meters and service drops, meter reading, billing and collection, and customer  
3 information and services, as well as a portion of the investment in the distribution  
4 system. These investments and expenses are made and incurred based on the  
5 number of customers, regardless of the amount of energy used, and are therefore  
6 generally considered to be fixed costs.

7 **Q. Please describe in general terms the process used to functionalize and**  
8 **classify the Company's revenue requirement.**

9 A. In the functionalization process, individual plant items, operations and maintenance  
10 expenses, and other operating revenues are examined and, where possible, the  
11 associated costs and revenues are assigned to one or more operating functions.  
12 The remaining costs and revenues are allocated to each functional category  
13 according to the appropriate allocation basis. Generation costs are further classified  
14 as either demand- or energy-related, transmission costs are classified as demand-  
15 related, and distribution costs are classified as either demand- or customer-related.  
16 The following example illustrates this process: for Accounts 310 through 316, Steam  
17 Production, the Company's investment in steam production plant is assigned to the  
18 production or generation function and to the demand and energy cost classifications.  
19 The resulting functionalization and classification of costs may itself serve as a basis  
20 for subsequent allocations. This use is illustrated where the accumulated  
21 depreciation for steam production plant is functionalized and classified on the same  
22 basis as steam plant investment.

23 **Q. Has the Company classified transmission-related investment in a manner**  
24 **consistent with the methodology used in the 2009 Rate Case?**

25 A. Yes. Transmission-related investment has been classified as 100 percent demand-  
26 related according to the Company's traditional approach. In the settlement

1 stipulation to the 2009 Rate Case, the Company agreed to the classification of  
2 transmission-related revenue requirement as 75 percent demand-related and 25  
3 percent energy-related. While the Company agreed to this one-time adjustment for  
4 use in the settlement stipulation, it believes that classifying transmission-related  
5 investment as 100 percent demand-related results in a more appropriate allocation of  
6 transmission-related costs.

7 **Q. Please describe Exhibit 1004.**

8 A. Exhibit 1004 details the development of the Company's functionalized revenue  
9 requirement for each of the following categories: (1) generation, (2) transmission,  
10 and (3) distribution. As can be seen on Exhibit 1004, the total Oregon jurisdictional  
11 revenue requirement of \$45,721,417 has been segmented into the Company's three  
12 main operating functions. Generation-related revenue requirement represents  
13 approximately \$25.8 million or 56.4 percent of the total; transmission represents  
14 approximately \$4.6 million or 10 percent; and distribution represents \$15.3 million or  
15 33.6 percent.

16 **III. 2011 MARGINAL COST ANALYSIS**

17 **Q. What methodology was used to allocate the proposed revenue requirement to**  
18 **customer classes in this general rate case proceeding?**

19 A. The proposed revenue requirement has been apportioned to customer classes  
20 according to the Company's 2011 Marginal Cost Analysis. In general terms, this  
21 analysis calculates the marginal cost associated with supplying an added unit of  
22 electricity or serving an additional customer. A detailed description of the 2011  
23 Marginal Cost Analysis and supporting schedules showing the development of the  
24 marginal costs is provided in Exhibit 1005.

25 **Q. Please summarize the 2011 Marginal Cost Analysis, which is described in**  
26 **greater detail in Exhibit 1005.**

1 A. The 2011 Marginal Cost Analysis was prepared according to concept and design  
2 specifications of the National Economic Research Associates, Inc. (“NERA”)  
3 marginal cost model. The NERA model is constantly being refined but the basic  
4 concepts and methods have remained the same since Idaho Power began using this  
5 method. The analysis identifies the long-run marginal cost of providing electric  
6 service to new load on the Idaho Power Company system. The Company’s  
7 forecasted growth-related generation, transmission, and distribution costs are  
8 identified and classified into the appropriate energy-, demand-, and customer-related  
9 components in a manner similar to the classification of the Oregon jurisdictional  
10 revenue requirement.

11 The energy-related marginal costs include net power supply costs, variable  
12 operation and maintenance (“O&M”) expenses, fuel inventory, and losses. Demand-  
13 related costs are comprised of generation, transmission, and distribution investment  
14 and associated fixed O&M expenses. Customer-related costs include investment  
15 costs that are attributable to anticipated growth in the number of customers served.  
16 In this analysis, marginal unit costs are prepared for each functional category for use  
17 in apportioning the revenue requirement to customer classes.

18 **Q. How does the 2011 Marginal Cost Analysis compare to the analysis filed in the**  
19 **Company’s last general rate case proceeding, Docket No. UE 213?**

20 A. The 2011 Marginal Cost Analysis was prepared according to the same methodology  
21 used to prepare the 2009 Marginal Cost Analysis (“2009 Analysis”) filed in Docket  
22 No. UE 213. A comparison of the numerical results of the 2011 and 2009 Analyses  
23 is provided later in my testimony.

24 **Q. Please explain how the generation marginal costs for the energy- and demand-**  
25 **related categories were determined.**

26

1 A. Generation energy-related marginal costs were determined by a simulated operation  
2 of the Company's power supply system over 83 streamflow conditions for the five  
3 year period 2011 through 2015 using the Company's AURORA Power Supply Model.  
4 Base case net power supply expenses were quantified and the model was run a  
5 second time with 50 megawatts ("MW") of load added across all hours. The  
6 difference in monthly power supply expenses between the base run and the "base-  
7 plus-50-MW run" was averaged over the five year period and was divided by the  
8 difference in monthly megawatt hours ("MWh") to produce an average monthly  
9 marginal cost per megawatt hour.

10 Generation demand-related marginal costs are based upon the levelized cost  
11 of a simple-cycle combustion turbine from Idaho Power's 2011 IRP. The peaking  
12 resource selected from the resource portfolio to quantify the marginal generation  
13 capacity cost is the Danskin CT1 Combustion Turbine. This resource is the latest  
14 peaking resource addition to the Company's rate base. The generation capacity  
15 marginal costs are then seasonalized based on the monthly peak hour load  
16 surplus/deficiency data, assuming 90th percentile streamflow conditions, 70th  
17 percentile average load, and 95th percentile peak-hour load contained in the 2011  
18 IRP.

19 **Q. Please explain how the transmission marginal costs were determined.**

20 A. The marginal cost of transmission reflects planned investment in transmission plant  
21 for a ten-year period, 2011 through 2020. Demand-related transmission O&M costs  
22 were estimated using historic data for the period 2006 through 2010. Transmission  
23 marginal costs were seasonalized in a manner similar to that used to seasonalize the  
24 generation capacity marginal costs.

25 **Q. Please provide an overview of how the distribution marginal costs were**  
26 **determined.**

1 A. The distribution marginal costs were developed according to NERA's facilities cost  
2 approach. Under this method, distribution costs are divided into three categories: (1)  
3 costs that increase due to growth in actual peak demand, (2) design demand-related  
4 costs, and (3) customer-related costs. According to the NERA model, design  
5 demand-related costs are those costs that are considered fixed over time because  
6 they do not change in response to customers' actual loads. Design demand-related  
7 costs are incurred on the basis of the planner's engineering design standards, which  
8 reflect the number of customers to be served, and the expected maximum demand  
9 of those customers, rather than on changes in actual peak demand.

10 The first category of costs, those that increase due to growth in actual peak  
11 demand, is comprised of distribution substation carrying costs and related O&M  
12 expense. The second category of costs is comprised of the carrying costs of the  
13 plant located between the substation and the service drop, and the associated O&M  
14 expense. This includes primary lines, secondary lines, poles, transformers, and  
15 associated equipment. Customer-related costs include the carrying cost of the  
16 service drop, customer service and informational expense, and customer accounting  
17 expense. Customer service and informational expense refers to those expenses  
18 included in FERC Accounts 907 through 910 and customer accounting expense  
19 refers to those expenses included in FERC Accounts 901 through 905. The service  
20 drop is considered by NERA to be part of the design demand-based category, but  
21 Idaho Power's practice has been to include the service drop as part of the customer-  
22 related category, as it has been done in this analysis.

23 **Q. Please describe page 30 of Exhibit 1005, Schedule 16.**

24 A. Page 30 of Exhibit 1005, Schedule 16, presents the results of the 2011 Marginal  
25 Cost Analysis. The analysis results are presented in terms of marginal unit costs for  
26 each customer class. The marginal unit cost values for the generation and



1 transmission functional categories are provided as monthly values and the  
2 distribution-related marginal unit costs are provided as annual values. The  
3 distribution-related marginal costs reflect the attribution of primary and secondary  
4 distribution costs to the appropriate classes depending on the voltage level of service  
5 (primary, secondary, or transmission).

6 **Q. Why are monthly marginal unit cost values provided for the generation and**  
7 **transmission functional categories, while only annual values are provided for**  
8 **the distribution category?**

9 A. Marginal unit costs are prepared as either monthly or annual values in order to align  
10 with the associated allocation basis. Marginal unit costs are developed for the  
11 purpose of determining the total marginal costs by functional category by customer  
12 class. In this analysis, the total marginal costs by customer class were determined  
13 by multiplying the marginal unit costs for each functional category by the appropriate  
14 allocation basis for each customer class; i.e., energy, demand, or number of  
15 customers. For example, the total generation and transmission capacity marginal  
16 costs for each class were determined by multiplying each class's 12 monthly  
17 coincident peak demand values by the corresponding monthly marginal unit cost.  
18 Similarly, the total energy-related generation marginal costs for each class were  
19 determined by multiplying each class's monthly energy values by the corresponding  
20 monthly marginal unit cost. The marginal unit costs for the generation and  
21 transmission functional categories are prepared as monthly values to recognize that  
22 those cost categories vary by month and, to a greater extent, seasonally.

23 Consistent with that rationale, the distribution marginal unit costs have been  
24 prepared as annual values in order to recognize that distribution costs do not vary by  
25 month or seasonally to the extent of the other functional categories. The total  
26 distribution demand-related marginal costs by customer class were determined by

1 applying the class-specific distribution demand-related marginal unit cost to the  
2 single highest monthly non-coincidental peak demand value for each customer class.  
3 Similarly, the total distribution customer-related marginal costs by customer class  
4 were determined by applying the class-specific distribution customer-related  
5 marginal unit cost to the corresponding annual customer counts for each class. The  
6 use of annual values in the case of distribution costs achieves the goal of aligning  
7 the marginal unit costs with the associated allocation basis.

8 **Q. Has the Company made any modifications to the derivation of test year**  
9 **coincident peak demand values for use in the calculation of total marginal**  
10 **costs?**

11 A. Yes. The Company has modified the derivation of test year coincident peak demand  
12 values to address the potential effect of the Company's Demand Response ("DR")  
13 programs on the revenue requirement allocation process.

14 **Q. Please provide a brief description of each of the DR programs that will be**  
15 **operated by the Company during 2011.**

16 A. In 2011, the Company will operate three separate DR programs: Irrigation Peak  
17 Rewards, A/C Cool Credit, and FlexPeak Management. Irrigation Peak Rewards is a  
18 DR program available to agricultural irrigation customers. A/C Cool Credit is a DR  
19 program available to residential customers in select areas within the Company's  
20 service area where the necessary communication technology is available. FlexPeak  
21 Management is a DR program available to larger commercial and industrial  
22 customers. These programs have allowed the Company to successfully and cost-  
23 effectively reduce load during the summer afternoon hours when demand for  
24 electricity is highest.

25 **Q. Why is it necessary to adjust coincident peak demands to account for**  
26 **reductions from DR programs?**

1 A. As my testimony states, each class's 12 monthly coincident peak demand values are  
2 multiplied by the corresponding monthly marginal unit cost for the purpose of  
3 allocating a portion of the demand-related revenue requirement. When DR programs  
4 reduce demand at the time of the system peak, they have the potential to reduce the  
5 participating class's coincident peak demand values, subsequently reducing its  
6 allocation of any coincident peak demand-related revenue requirement. As a result,  
7 classes without DR programs in effect during the system's peak hour could receive a  
8 higher revenue requirement allocation when DR programs successfully reduce peak  
9 hour demand.

10 **Q. Could this result in inequitable revenue requirement allocation?**

11 A. Yes. DR programs are intended to generate cost savings during system peak hours  
12 by reducing demand, thus avoiding or reducing the need to acquire more costly  
13 supply-side resources. In this sense, they are operated in the same manner as  
14 traditional supply-side resources. With respect to the cost-of-service study, the  
15 Company's resource selection should not unduly affect the allocation of revenue  
16 requirement among customer classes. If the effects of DR programs are not  
17 accounted for, revenue requirement allocation can potentially be skewed when  
18 demand reductions are achieved during peak hours. If no adjustments are made,  
19 coincident peak demand-related allocation can potentially shift revenue requirement  
20 solely based on the Company's choice to utilize a demand-side resource over  
21 traditional supply-side resources.

22 Further, the Company's DR programs provide a financial incentive to  
23 participants in exchange for temporary load reduction. Any revenue requirement  
24 allocation benefits received from DR program reductions that are not accounted for  
25 in the initial incentive design provide the potential for an unintended benefit to  
26 participating rate classes at the expense of non-participating rate classes. These

1 allocation benefits are also received by all customers of a participating rate class,  
2 although not all customers within each rate class participate in DR programs,  
3 resulting in the potential for non-participating customers to receive a benefit without  
4 providing any load reduction in return.

5 Finally, the costs of the Company's DR programs are spread among all rate  
6 classes. The successful operation of these programs results in system cost savings  
7 by avoiding more expensive supply-side resources. Without adjustment, demand  
8 reductions during the time of the system peak can potentially lower revenue  
9 requirement allocation to participating classes while increasing allocation to other  
10 classes. This creates the potential for rate classes to contribute to the funding of DR  
11 programs, while at the same time receiving a higher revenue requirement allocation  
12 when the programs are successful.

13 **Q. Please describe the methodology used to adjust the coincident peak demand**  
14 **values to better reflect the impact that the DR programs have on the**  
15 **Company's peak demands.**

16 A. The method for estimating system coincident demands utilizes system coincident  
17 demand factors, which represent the ratio of the system coincident demand to the  
18 average demand. To derive the monthly system coincident demands, monthly 2010  
19 factors derived from historical load research data are applied to the associated  
20 population's monthly average demands for the test year.

21 To remove the potential for inequitable cost allocation due to the effect of the  
22 DR programs, the Company's proposed method derives system coincident demand  
23 factors as if no DR programs had been in effect during the historical data period. In  
24 doing so, DR programs receive equal treatment to the Company's supply-side  
25 resources, removing the potential for resource selection to unduly affect the revenue  
26 requirement allocation process.

1           To accomplish this, historical load data was adjusted to reflect system loads  
2 that would have occurred had no DR programs been in effect. This adjustment was  
3 made by adding back estimated demand reductions achieved through the respective  
4 DR programs to historical hourly system loads. The resulting load shape reflects  
5 system loads that the Company's supply-side resources would have been required to  
6 meet without the availability of demand-side resources. The adjusted data was then  
7 used to determine the hour that the system peak would have occurred absent DR  
8 programs, and system coincident demand factors were calculated according to the  
9 adjusted peak hour and historical usage data. Finally, these factors were applied to  
10 forecast average demand to derive coincident peak demands by rate class for each  
11 month of the test period. A detailed description of the coincident peak demand  
12 derivation process is provided in the document Peak Responsibility Methods for the  
13 2011 General Rate Case, provided in my workpapers.

14 **Q. How did the Company arrive at its proposed methodology?**

15 A. The effect of DR programs on the derivation of coincident peak demands was  
16 discussed with subject matter experts throughout the Company in Load Research,  
17 Regulatory Affairs, Energy Efficiency, and Power Supply Planning. The issue was  
18 also discussed with the well-respected industry consultant Global Energy Partners,  
19 LLC, which published a research document titled, *Demand Response: It's A*  
20 *Resource, So Treat It Like One*. This document suggests treating DR programs in  
21 the same manner as supply-side resources in the derivation of coincident peak  
22 demands. The Company's proposed methodology aligns with this suggested  
23 treatment, and represents the consensus following extensive internal discussion.

24 **Q. Idaho Power submitted a Marginal Cost Analysis as part of the 2009 Rate Case.**  
25 **How do the results of the current analysis compare to the results of the 2009**  
26 **Rate Case Analysis?**

1 A. The 2011 Analysis results are comparable to the results of the 2009 Analysis with  
2 the exception of a few areas.

3 From the 2009 Analysis to the 2011 Analysis, average annual energy costs  
4 decreased from \$60.31 per MWh to \$39.85 per MWh. A primary cause of this  
5 reduction is a change in the projected dispatch of the Company's coal-fired power  
6 facilities between the 2009 and 2011 IRPs. As stated on page 96 of the 2009  
7 Integrated Resource Plan ("2009 IRP"), the potential cost of carbon emissions in the  
8 2009 edition was treated differently than in previous plans. Prior to the 2009 plan the  
9 Company utilized a carbon adder, or tax, in its power supply modeling to reflect the  
10 costs associated with possible carbon regulation. For the 2009 IRP, however, the  
11 Company utilized a forced coal curtailment strategy to reflect the provisions of the  
12 Waxman-Markey bill, which had been passed by the House of Representatives but  
13 not yet debated in the Senate at the time of the 2009 IRP filing. Due to the  
14 subsequent failure of the Waxman-Markey bill, the Company returned to its previous  
15 method of utilizing a carbon adder in power supply modeling in the 2011 IRP,  
16 increasing the projected dispatch of relatively low-cost coal-fired facilities.  
17 Consequently, the marginal cost of energy decreased due to the added availability of  
18 coal-fired resources.

19 Annual generation capacity costs as computed in the 2009 Analysis were \$45  
20 per kilowatt ("kW") in 2009 dollars, while in the current analysis the costs have  
21 declined to \$38 per kW in 2010 dollars. A portion of the decline in marginal capacity  
22 cost is the result of a reduction in the Company's requested return on equity ("ROE")  
23 between the 2009 and 2011 general rate case filings. In the 2009 case, the  
24 Company requested an ROE of 11.25%, while in the 2011 filing the Company is  
25 requesting an ROE of 10.50%. The lower requested ROE results in lower carrying  
26 costs, which in turn result in lower annual costs associated with generation capacity.

1           The cost of annual transmission capacity was \$173 per kW in the 2009  
2 Analysis and is now \$150 per kW in the current analysis. This change is due to two  
3 primary factors. First, annual transmission capacity costs were affected by the lower  
4 requested ROE of 10.50% in the same manner as annual generation capacity costs,  
5 reducing associated economic carrying charges resulting in lower overall annual  
6 costs. Second, the 2011 Analysis reflects lower transmission investment associated  
7 with the integration of new resources. In the 2009 Analysis, the forward-looking five-  
8 year planning period included four years of investment associated with the  
9 integration of the gas-fired Langley Gulch power plant, totaling approximately \$32  
10 million in investment from 2009 through 2012. In the 2011 Analysis much of this  
11 investment has already taken place, with only two years of investment occurring in  
12 the forward-looking five-year planning period, totaling approximately \$18 million from  
13 2011 through 2012.

14           The marginal cost of distribution substation capacity was \$18.80 per kW in  
15 the 2009 Analysis and is \$11.00 per kW in the current analysis. This reduction in the  
16 marginal cost can be attributed largely to a lower five-year budget forecast of growth-  
17 related distribution substation investment. The 2009 Analysis contained a five-year  
18 budget of approximately \$54 million, while the 2011 Analysis reflects a five-year  
19 budget of approximately \$37 million. The budget included in the 2011 Analysis is  
20 lower than the 2009 Analysis due to a number of factors, which include a large  
21 project that was customer-funded, the acceleration of a number of projects that were  
22 completed in 2010 rather than 2011 or beyond, the replacement of a number of  
23 projects by large distribution projects which shifted them out of the stations budget  
24 and into the distribution capital spend, and the delay of a number of projects until  
25 2016 and beyond due to the current condition of the economy.

26

1           Distribution facilities investment costs ranged from \$17.95 per kW to \$54.88  
2 per kW in the 2009 Analysis. In the current analysis, these costs ranged from \$15.45  
3 per kW to \$44.27 per kW. Distribution customer-related costs ranged from \$87.15  
4 per customer to \$3,165.74 per customer in the 2009 Analysis. In the current  
5 analysis, these costs ranged from \$76.09 per customer to \$2,534.67 per customer.

6           Overall, the results of the 2011 Analysis appear reasonable when compared  
7 to the 2009 Analysis, especially when considering the changes in circumstances as  
8 described above.

9           **IV. MARGINAL COST-BASED REVENUE REQUIREMENT ALLOCATION**

10 **Q. Once the marginal costs for each functional category were determined, how**  
11 **were those marginal costs utilized to allocate the Oregon jurisdictional**  
12 **revenue requirement to each customer class?**

13 A. Exhibit 1006 presents the total marginal cost by customer class and by functional  
14 category resulting from the 2011 Analysis. As can be seen on page 1 of Exhibit  
15 1006, the total functionalized revenue requirement from Exhibit 1004 has been  
16 allocated to each customer class in proportion to the marginal cost by class for each  
17 functional category. This allocation represents the Company's quantification of the  
18 cost of providing service to each customer class, or the "cost-of-service." The total  
19 marginal costs exceed the Oregon jurisdictional revenue requirement and are not the  
20 basis of recovery from classes, but rather are utilized to determine each class's  
21 responsibility or share of the total Oregon jurisdictional revenue requirement.

22           Pages 2 through 5 of Exhibit 1006 present the class-specific units costs. The  
23 class-specific unit costs represent the revenue requirement by billing unit for each  
24 customer class. The unit costs ultimately help guide the rate design process by  
25 providing a cost-of-service basis for each rate component.

26



1 **Q. Has the Company allocated generation-related investment in a manner**  
2 **consistent with the methodology used in the 2009 Rate Case?**

3 A. Yes. The energy-related and demand-related portions of embedded generation  
4 costs were allocated separately based on their respective marginal costs according  
5 to the Company's traditional approach. In the settlement stipulation to the 2009 Rate  
6 Case, the Company agreed to a one-time adjustment to not divide embedded  
7 generation costs into energy-related and demand-related portions prior to class  
8 allocation. While the Company agreed to this one-time adjustment for use in the  
9 settlement stipulation, it believes that blending these costs prior to class allocation  
10 reduces the level of accuracy of the allocation process. By combining these costs,  
11 class allocation is disconnected from the corresponding cost drivers, resulting in the  
12 potential to allocate costs disproportionately to cost responsibility.

13 **Q. Line 26, page 1 of Exhibit 1006 presents the "Direct Assignment" of a portion**  
14 **of the customer-related distribution costs. What portion of the Company's**  
15 **revenue requirement has been directly assigned to customer classes on line**  
16 **26?**

17 A. The revenue requirement amount on line 26, page 1 of Exhibit 1006 is comprised of  
18 rate base associated with FERC Accounts 371 and 373 and expenses associated  
19 with FERC Accounts 585, 587, and 598. The revenue requirement amount on line  
20 26 is largely associated with expenses related to rendering services at customers'  
21 premises. Examples of such services include inspecting customers' premises,  
22 installing, testing, and removing leased equipment, and testing customer-owned  
23 equipment. The remainder of the revenue requirement on line 26 is associated with  
24 the Company's lighting service customer classes.

25 **Q. Please describe the results of the marginal cost-based revenue requirement**  
26 **allocation presented on Exhibit 1006.**

1 A. As can be seen on Exhibit 1006, a pure marginal cost-based allocation of the Oregon  
2 jurisdictional revenue requirement results in increases of 18.75 percent for  
3 Residential Service, 2.10 percent for Small General Service, 8.31 percent for Large  
4 General Service – Secondary Voltage Level, 2.59 percent for Large General Service  
5 – Primary Voltage Level, -26.72 percent for Large General Service – Transmission  
6 Voltage Level, -6.53 percent for Area Lighting Service, -2.50 percent for Large Power  
7 Service – Primary Voltage Level, 15.08 percent for Large Power Service –  
8 Transmission Voltage Level, 61.28 percent for Irrigation Service, 13.57 percent for  
9 Unmetered General Service, 1.01 percent for Municipal Street Lighting Service, and  
10 55.42 percent for Traffic Control Lighting Service.

11 **V. PROPOSED REVENUE REQUIREMENT ALLOCATION**

12 **Q. What is the Company's general philosophy on revenue requirement recovery**  
13 **from customer classes?**

14 A. The Company's primary approach to revenue requirement allocation in the last  
15 several general rate cases has been to establish class revenue requirements that as  
16 accurately as possible reflect the costs of serving those customer classes.  
17 Accordingly, the Company's ratemaking proposals generally advocate movement  
18 towards the cost-of-service results, which assign costs to those customer classes  
19 that cause the Company to incur the costs.

20 **Q. Are there other objectives that may be considered in the ratemaking process?**

21 A. Yes. The Commission may consider a number of other objectives, such as rate  
22 stability, in the determination of rates.

23 **Q. How did you approach the determination of the Company's proposed revenue**  
24 **requirement for each customer class?**

25 A. A pure marginal cost-based revenue requirement spread would result in substantial  
26 increases to Irrigation Service and Traffic Control Lighting Service. In order to

1 mitigate the magnitude of the rate increase to each of these customer classes that  
2 would be necessary to bring them to current cost-of-service levels, the Company is  
3 proposing to cap the percentage increase for Irrigation Service and Traffic Control  
4 Lighting Service at two-times the average overall requested increase, or 29.34%.  
5 Furthermore, a pure marginal cost-based revenue requirement spread would result  
6 in decreases for Large General Service – Transmission Voltage Level, Area Lighting  
7 Service, and Large Power Service – Primary Voltage Level. For these classes, the  
8 Company proposes to apply a 0.00 percentage change “floor” resulting in neither an  
9 increase nor a decrease.

10 **Q. Did you discuss the results of the cost-of-service study internally before**  
11 **deciding to apply the caps and floors to the specified customer classes?**

12 A. Yes. I discussed the results of the cost-of-service study and potential rate spread  
13 scenarios with Mr. Gregory W. Said, who is responsible for the overall preparation of  
14 this case. My revenue requirement allocation recommendation is a result of those  
15 discussions.

16 **Q. Do you have an exhibit that details the class revenue requirement**  
17 **determination?**

18 A. Yes. Exhibit 1007 is a four-page exhibit that steps through the revenue requirement  
19 allocation process from the cost-of-service results to the ultimate proposal for each  
20 customer class. Page 1 of Exhibit 1007 is the pro forma normalized test year sales  
21 and revenues. Page 2 details the results from the cost-of-service study and  
22 illustrates the revenue changes that would be made to each customer class to obtain  
23 the cost-of-service results. Page 3 shows the revenue shortfall that resulted by  
24 applying the caps and floors to the specified customer classes. Finally, page 4  
25 shows the proposed increase to the other customer classes which resulted from  
26 spreading the shortfall created by the mitigation to the remaining classes in order to

1 obtain the total Oregon jurisdictional target revenue requirement. I have provided the  
2 results from page 4 to Mr. Scott Sparks and Ms. Darlene Nemnich and their Rate  
3 Design Team for use in determining the individual rates for the Company's general  
4 tariff customers.

5 **Q. Does this conclude your testimony?**

6 **A. Yes.**

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Development of Sales Forecast for Revenue Calculation

July 29, 2011



**Date:** February 18, 2011  
**To:** Tim Tatum  
**From:** Barr Smith  
**Subject:** Development of Sales Forecast for Revenue Calculation

## **Energy and Customer Forecast Development**

The process used to develop future year energy and customer counts by rate schedule and jurisdiction has two distinct steps. In the first step, sales and customer forecasts are developed on a system-wide basis for each major customer segment or class; i.e., residential, commercial, industrial, irrigation and special contracts. In the second step, the sales and customer forecasts developed in the first step are allocated to each individual service schedule or rate schedule. The allocation basis used for each customer class forecast is the most current historical year's weather normalized electricity sales (also referred to as weather-adjusted sales); in this case 2010 was used. The historical 2010 weather-adjusted sales, available by rate schedule and jurisdiction, are used *only* to allocate the system class-level forecasts to rate schedule and jurisdiction. The regression equations used to weather-normalize historical electricity sales are not used in the long-term forecasts of electricity sales.

## **Sales Forecasting Process**

### ***System Sales Forecast Development by Class***

A long-term sales forecast is prepared, typically once each year, for each customer class: residential, commercial, industrial, and irrigation, as well as for each special contract customer. The sales forecast process is described in detail in *Appendix A – Sales and Load Forecast for the Integrated Resource Plan (IRP)*, filed June 2011.

The sales forecast models are driven by the most recent available economic forecast. The economic forecast is based on a forecast of national and regional economic activity developed by Moody's Analytics, a national econometric consulting firm. Moody's Analytics July 2010 macroeconomic forecast was used to develop the August 2010 forecast for the 2011 IRP. The national, state, metropolitan statistical area (MSA), and county econometric projections are tailored to Idaho Power's service area using an economic database developed by an outside consultant. National economic drivers from Moody's Analytics were also used in development of the most recent sales forecast.

Economic growth assumptions influence several of the individual class of service growth rates. Because growth in the number of households within individual counties in Idaho Power's service area differs from statewide household growth, service area households are derived from county-specific household forecasts. The number of households, incomes, employment projections,

economic output, real retail electricity prices, and customer consumption patterns are used to form load projections.

The sales and load forecast is constructed by developing a separate forecast for each individual sales category. Independent sales forecasts are prepared for each of the major customer classes: residential, commercial, irrigation, and industrial. Individual energy forecasts are developed for Micron Technology, Simplot Fertilizer, the Idaho National Laboratory (INL), and Hoku Materials, Inc. (Hoku). The assumptions for each of the individual categories are described in greater detail in their respective sections in *Appendix A –Sales and Load Forecast for the Integrated Resource Plan*. System residential sales are a function of a number of factors affecting electricity sales to that sector. Residential sales are a function of heating degree days (HDD) in wintertime, cooling degree days (CDD) in summertime, the number of service area households as derived from Moody's Analytics forecasts of county housing stock, the real price of electricity, and the real price of natural gas. System commercial sales are also a function of HDD, CDD, the real price of electricity, and the number of service area households, as well as service area employment as derived from Moody's Analytics forecasts. In the industrial sector forecast, regression models were developed for 17 industry groups to determine the relationship between historical electricity sales and historical employment or population, and other relevant explanatory variables. The estimated coefficients from the industry group regression models were then applied to the appropriate employment or population drivers, resulting in the escalation of electricity sales to the various industry groups over time. The system irrigation sales forecast considers several factors affecting electricity sales to the irrigation class, including temperature, precipitation, spring rainfall, *Moody's Gross Product: Farms, for Idaho*, and the real price of electricity.

### ***Energy Forecast Development by Jurisdiction and Rate Schedule***

To accurately estimate the revenue derived from energy and apply the appropriate charges to that energy, it is necessary to develop a more-detailed energy forecast that provides a forecast of energy sales by jurisdiction and rate schedule. The models for allocating the system class-level sales forecasts (residential, commercial, industrial, and irrigation classes) to jurisdiction and rate schedule were developed as follows:

#### ***Residential Energy Forecast***

The residential class includes electricity sales to customers taking service under Schedule 1 (Schedules 3, 4, and 5, inclusive) and Schedule 15. Because the residential sales forecast was developed on a system-wide basis by billing month, it was necessary to allocate the system-wide residential sales forecast to each jurisdiction and the appropriate rate schedules (Schedules 1 and 15). In this process, 2010 normalized energy was used to develop allocation factors for each jurisdiction and rate. The allocation factors were then applied to the system-wide billing month residential sales forecast (excluding Schedule 15) to determine the forecast of billing month residential sales by rate schedule and jurisdiction. This method results in Idaho jurisdiction residential sales (Schedule 1) that grow at essentially the same rate as Oregon jurisdiction residential sales. The Schedule 15 forecast energy figures in both the IPUC and OPUC jurisdictions were set to match the 2010 normalized energy figures (i.e., no sales growth). No sales growth was assumed based on an historical trend of flat /no growth from 2000 through 2010.

### ***Commercial Energy Forecast***

The commercial class includes electricity sales to customers taking service under Schedules 7, 9 (Primary, Secondary, and Transmission Service), 16, 40, 41, and 42. Because the commercial sales forecast was developed on a system-wide basis by billing month, it was necessary to allocate the system-wide commercial sales forecast to each jurisdiction and the appropriate rate schedules (Schedules 7, 9 Secondary and Primary Service). In this process, 2010 normalized energy was used to develop allocation factors for each jurisdiction and rate. The allocation factors were then applied to the system-wide billing month commercial sales forecast (excluding Schedules 16, 40, 41, and 42) to determine the forecast of billing month commercial sales by rate schedule and jurisdiction. The Schedules 9 Transmission Service, 16, 40, 41, and 42 forecast energy figures in both the IPUC and OPUC jurisdictions were set to match the 2010 normalized energy figures (i.e., no sales growth). No sales growth was assumed based on an historical trend of flat /no growth from 2000 through 2010.

### ***Industrial Energy Forecast***

The industrial class includes electricity sales to customers taking service under Schedule 19 (Primary, Secondary, and Transmission Service). Because the industrial sales forecast was developed on a system-wide basis by billing month, it was necessary to allocate the system-wide industrial sales forecast to each jurisdiction and the appropriate rate schedules (Schedules 19 Primary and Transmission Service). In this process, 2010 normalized energy was used to develop allocation factors for each jurisdiction and rate. The allocation factors were then applied to the system-wide billing month industrial sales forecast (excluding Schedule 19 Secondary Service) to determine the forecast of billing month industrial sales by rate schedule and jurisdiction. Because only one customer takes service under Schedule 19 Secondary Service, forecast figures were set to match the 2010 normalized energy figures (i.e., no sales growth). No sales growth was assumed based on an historical trend of flat /no growth from 2000 through 2010.

### ***Irrigation Energy Forecast***

The irrigation class includes electricity sales to customers taking service under Schedule 24 Secondary Service. Because the irrigation sales forecast was developed on a system-wide basis by billing month, it was necessary to allocate the system-wide irrigation sales forecast to each jurisdiction. In this process, 2010 normalized energy was used to develop allocation factors for each jurisdiction. The allocation factors were then applied to the system-wide billing month irrigation sales forecast to determine the forecast of billing month irrigation sales by jurisdiction.

### ***Energy Forecasts – Special Contracts***

The special contract energy forecasts for Simplot Fertilizer, Micron Technology, the INL, and Hoku are each set directly to the values in the long-term sales forecast in the appropriate jurisdiction. For this rate case, however, an adjustment was made regarding the treatment of the Hoku special contract customer. The IRP forecast reflects a ramp-up schedule for Hoku that does not reach full contract levels until early 2011, and maximum capacity in all months of the year until 2013. For ratemaking purposes, 2011 usage has been annualized to reflect loads that would have occurred had Hoku been operating at its full contract level for all twelve months of the year. This adjustment was made to allow the Company to develop rates based on a normalized annualized test year rather than a one-time load pattern that does not reflect typical or expected customer behavior on a long-term basis. More detail on the development of the long-term sales forecast for



each special contract customer can be found in *Appendix A –Sales and Load Forecast for the Integrated Resource Plan*.

### ***Expected Oregon Large Load Customer***

In *Appendix A – Sales and Load Forecast for the Integrated Resource Plan*, a new large load customer is expected to begin taking service in the Company's Oregon jurisdiction in late 2011. This customer, however, is not included in the load forecast prepared for this rate case filing. As of the rate case filing date, a final signed Electric Service Agreement (ESA) had not been established between Idaho Power and this new large load. While the IRP forecast must incorporate expected large loads into the resource planning process, it is not appropriate to include such loads in the ratemaking process until a contractual agreement for providing electrical service has been finalized.

## **Customer Forecast Development**

### ***System Customer Forecast Development by Class***

Once each year a system customer count forecast is prepared for each customer class: residential, commercial, industrial, and irrigation. In the residential customer forecast, the number of residential customers is a function of the number of new service area households as derived from Moody's Analytics forecast of county housing stock and demographic data. Additionally, the number of commercial customers being added each year is a function of the number of new residential customers being added. The industrial and irrigation customer forecasts are based on linear trends of operating area customer counts that are allocated to months and then summed to monthly class totals. The customer forecast process is better described in *Appendix A–Sales and Load Forecast for the Integrated Resource Plan*.

### ***Customer Forecast Development by Jurisdiction and Rate Schedule***

To accurately forecast the revenue derived from variable customer charges, it is necessary to develop a more-detailed customer forecast that provides customer counts by jurisdiction and rate schedule. The allocation of system class-level forecasts to jurisdiction and rate schedules are briefly described below for each individual class of customer.

### ***Residential Customer Forecast***

The residential class includes customers taking service under Schedules 1, 3, 4, and 5. Since the customer counts in all schedules except Schedule 1 are negligible in comparison to Schedule 1, the forecasts of all schedules except Schedule 1 were set to the most-recent month's actual customer count, December 2010. Jurisdictional split factors were calculated using the 12 months ending December 2010 Schedule 1 actual customer counts by jurisdiction. The resulting factors were applied to the adjusted-system residential class customer forecast (adjusted downward by the forecasted counts of the residential schedules described above) to determine jurisdictional counts for Schedule 1.

### ***Commercial Customer Forecast***

The commercial class includes customers taking service under Schedules 7, 9 (Primary, Secondary, and Transmission Service), 40, 41, and 42. Since the customer counts in all schedules except Schedules 7 and 9 Secondary are small in comparison, the forecasts of all schedules except Schedule 7 and 9 Secondary were set to the most-recent month's actual customer count (December

2010). Jurisdictional split factors were calculated using the 12 months ending December 2010 Schedule 7 and 9 Secondary actual customer counts by jurisdiction. The resulting factors were then applied to the adjusted-system commercial class customer forecast (adjusted downward by the forecasted counts of the other commercial schedules described above) to determine jurisdictional counts for Schedule 7 and 9 Secondary. Additionally, the IPUC jurisdiction Schedule 7 and 9 Secondary customer count forecasts were reallocated based on a historical trend analysis of the relationship between Schedule 7 and 9 Secondary customer counts within the IPUC jurisdiction to more accurately reflect future customer counts.

#### ***Industrial Customer Forecast***

The industrial class includes customers taking service under Schedule 19 (Primary, Secondary, and Transmission Service). Since the customer counts in schedules 19 Secondary and 19 Transmission Service are small in comparison to Schedule 19 Primary, the forecasts of those schedules were set to the most-recent month's actual customer count (December 2010). Jurisdictional split factors were estimated using the 12 months ending December 2010 Schedule 19 Primary actual customer counts by jurisdiction. The resulting factors were then applied to the remaining system industrial class customer forecast (adjusted downward by the forecasted counts of the Schedule 19 Secondary and 19 Transmission Service schedules described above) to determine jurisdictional counts for Schedule 19 Primary.

#### ***Irrigation Customer Forecast***

The irrigation class includes customers taking service under Schedule 24 Secondary Service. Jurisdictional split factors were estimated using the 12-months ending December 2010 Schedule 24 Secondary actual customer counts by jurisdiction. The resulting factors were then applied to the system irrigation class customer forecast to determine jurisdictional counts for Schedule 24 Secondary.

#### ***Summary***

This summarizes the development of both the energy sales and customer counts used as inputs to the calculation of normalized revenue.

If you have questions or require additional information, please let me know.

C: Matt Larkin  
Greg Said  
Catie Miller  
Brad Snow  
Scott Sparks  
Mike Youngblood

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Retail Revenue Forecast Summary

July 29, 2011

IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**TOTAL COMPANY**

12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	January	February	March	April	May	June
1 - Residential Serv.	45,316,626	40,212,509	34,755,596	30,016,470	24,523,062	25,278,822
3 - Residential Master Mete	49,318	42,302	35,992	32,205	24,410	23,808
4 - Residential Energy Wat	8,492	6,544	5,249	4,634	3,873	3,613
5 - Residential TOD	12,853	10,254	8,489	7,006	5,770	5,398
7 - Small General Serv.	1,592,740	1,466,178	1,349,635	1,247,264	1,088,641	1,191,247
9 - Large General Serv.	16,194,371	16,049,186	15,395,860	15,013,564	14,430,758	16,291,839
15 - Dusk/Dawn Lighting	102,571	103,786	102,947	103,671	103,511	103,597
19 - Uniform Rate Cont.	7,655,303	7,489,403	6,954,945	7,357,305	7,005,198	7,312,768
24 - Irrigation & Pump.	121,479	117,218	134,050	951,310	6,824,399	18,455,844
40 - Unmetered Gen. Serv.	89,446	89,277	89,255	89,262	88,787	88,993
41 - Municipal St. Light.	247,972	244,329	237,685	245,432	236,202	239,357
42 - Traffic Control Light.	14,683	13,966	14,090	14,037	13,898	13,787
<b>Total All Rates</b>	<b>71,405,854</b>	<b>65,844,952</b>	<b>59,083,793</b>	<b>55,082,160</b>	<b>54,348,509</b>	<b>69,009,073</b>
<u>Special Contracts</u>						
26 - Micron	1,349,354	1,290,425	1,363,083	1,345,720	1,374,225	1,402,993
29 - J R Simplot	503,405	478,060	512,202	499,270	508,464	385,072
30 - DOE	891,022	760,513	739,979	609,874	522,098	501,716
<b>Total Specials</b>	<b>2,743,781</b>	<b>2,528,998</b>	<b>2,615,264</b>	<b>2,454,864</b>	<b>2,404,787</b>	<b>2,289,781</b>
<b>Total Firm Retail Sales</b>	<b>74,149,635</b>	<b>68,373,950</b>	<b>61,699,057</b>	<b>57,537,024</b>	<b>56,753,296</b>	<b>71,298,854</b>

IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**TOTAL COMPANY**  
12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	July	August	September	October	November	December	Total
1 - Residential Serv.	31,471,341	37,782,033	32,245,682	25,327,667	28,532,238	38,803,376	394,265,422
3 - Residential Master Mete	22,948	27,230	26,610	21,651	27,321	38,819	372,614
4 - Residential Energy Wat	3,265	4,109	3,955	2,984	3,255	5,490	55,463
5 - Residential TOD	5,366	7,319	6,908	4,894	5,550	8,051	87,858
7 - Small General Serv.	1,356,184	1,456,201	1,360,045	1,185,614	1,178,007	1,448,446	15,920,202
9 - Large General Serv.	18,521,745	19,112,934	18,327,745	16,131,885	15,385,075	16,163,798	197,018,760
15 - Dusk/Dawn Lighting	103,779	103,796	103,745	103,497	103,205	103,101	1,241,206
19 - Uniform Rate Cont.	9,088,204	9,209,135	9,342,744	7,557,030	7,764,331	7,472,202	94,208,568
24 - Irrigation & Pump.	25,711,632	23,768,524	20,433,198	8,547,823	1,284,553	170,767	106,520,797
40 - Unmetered Gen. Serv.	88,439	87,901	88,503	87,681	87,757	87,787	1,063,088
41 - Municipal St. Light.	239,585	240,261	242,111	242,663	245,831	249,171	2,910,599
42 - Traffic Control Light.	13,799	13,725	12,888	12,383	11,879	12,287	161,422
<b>Total All Rates</b>	<b>86,626,287</b>	<b>91,813,168</b>	<b>82,194,134</b>	<b>59,225,772</b>	<b>54,629,002</b>	<b>64,563,295</b>	<b>813,825,999</b>
<u>Special Contracts</u>							
26 - Micron	1,461,263	1,413,484	1,333,719	1,315,148	1,264,628	1,272,292	16,186,334
29 - J R Simplot	507,870	501,371	489,720	499,147	496,895	510,822	5,892,298
30 - DOE	514,387	511,499	499,527	617,775	694,373	798,621	7,661,384
<b>Total Specials</b>	<b>2,483,520</b>	<b>2,426,354</b>	<b>2,322,966</b>	<b>2,432,070</b>	<b>2,455,896</b>	<b>2,581,735</b>	<b>29,740,016</b>
<b>Total Firm Retail Sales</b>	<b>89,109,807</b>	<b>94,239,522</b>	<b>84,517,100</b>	<b>61,657,842</b>	<b>57,084,898</b>	<b>67,145,030</b>	<b>843,566,015</b>

IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**STATE OF OREGON**  
BY MONTH BY RATE  
12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	January	February	March	April	May	June
01 - Residential Serv.	1,907,542	1,719,380	1,476,049	1,225,045	939,520	893,673
07 - Small General Serv.	150,913	138,170	127,232	115,279	104,657	113,269
09 - Large General Serv.	776,055	724,645	663,596	590,486	523,351	568,941
15 - Dusk/Dawn Lighting	9,403	9,387	9,388	9,378	9,380	9,368
19 - Uniform Rate Cont.	830,327	760,485	715,029	1,052,234	856,985	856,569
24 - Irrigation Service	6,582	5,816	5,644	7,457	205,188	670,744
40 - Unmetered Gen. Serv.	81	81	81	81	81	81
41 - Municipal St. Light.	10,412	10,379	10,169	10,352	10,323	10,270
42 - Traffic Control Light.	103	102	102	103	103	103

**Total Oregon Firm Sales**      3,691,418      3,368,445      3,007,290      3,010,415      2,649,588      3,123,018

IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**STATE OF OREGON**  
BY MONTH BY RATE  
12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	July	August	September	October	November	December	Total
01 - Residential Serv.	1,075,926	1,279,463	1,115,178	949,786	1,145,562	1,628,808	15,355,932
07 - Small General Serv.	127,340	148,408	130,247	119,154	127,057	157,674	1,559,400
09 - Large General Serv.	624,169	668,242	654,483	650,543	705,492	779,011	7,929,014
15 - Dusk/Dawn Lighting	9,389	9,343	9,365	9,447	9,319	9,295	112,462
19 - Uniform Rate Cont.	1,189,534	1,100,513	1,213,486	1,004,019	871,879	885,398	11,336,458
24 - Irrigation Service	761,495	829,483	724,240	195,883	30,759	10,980	3,454,271
40 - Unmetered Gen. Serv.	81	81	81	81	81	81	972
41 - Municipal St. Light.	10,283	10,279	10,303	10,333	10,356	10,392	123,851
42 - Traffic Control Light.	103	103	102	102	103	102	1,231
<b>Total Oregon Firm Sales</b>	<b>3,798,320</b>	<b>4,045,915</b>	<b>3,857,485</b>	<b>2,939,348</b>	<b>2,900,608</b>	<b>3,481,741</b>	<b>39,873,591</b>

IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**IDAHO JURISDICTION**  
BY MONTH BY RATE  
12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	January	February	March	April	May	June
1 - Residential Serv.	43,409,084	38,493,129	33,279,547	28,791,425	23,583,542	24,385,149
3 - Residential Master Mete	49,318	42,302	35,992	32,205	24,410	23,808
4 - Residential Energy Wat	8,492	6,544	5,249	4,634	3,873	3,613
5 - Residential TOD	12,853	10,254	8,489	7,006	5,770	5,398
7 - Small General Serv.	1,441,827	1,328,008	1,222,403	1,131,985	983,984	1,077,978
9 - Large General Serv.	15,418,316	15,324,541	14,732,264	14,423,078	13,907,407	15,722,898
15 - Dusk/Dawn Lighting	93,168	94,399	93,559	94,293	94,131	94,229
19 - Uniform Rate Cont.	6,824,976	6,728,918	6,239,916	6,305,071	6,148,213	6,456,199
24 - Irrigation & Pump.	114,897	111,402	128,406	943,853	6,619,211	17,785,100
40 - Unmetered Gen. Serv.	89,365	89,196	89,174	89,181	88,706	88,912
41 - Municipal St. Light.	237,560	233,950	227,516	235,080	225,879	229,087
42 - Traffic Control Light.	14,580	13,864	13,988	13,934	13,795	13,684
<b>Total Idaho Rates</b>	<b>67,714,436</b>	<b>62,476,507</b>	<b>56,076,503</b>	<b>52,071,745</b>	<b>51,698,921</b>	<b>65,886,055</b>
<u>Special Contracts</u>						
26 - Micron	1,349,354	1,290,425	1,363,083	1,345,720	1,374,225	1,402,993
29 - J R Simplot	503,405	478,060	512,202	499,270	508,464	385,072
30 - DOE	891,022	760,513	739,979	609,874	522,098	501,716
<b>Total Specials</b>	<b>2,743,781</b>	<b>2,528,998</b>	<b>2,615,264</b>	<b>2,454,864</b>	<b>2,404,787</b>	<b>2,289,781</b>
<b>Total Idaho Firm Sales</b>	<b>70,458,217</b>	<b>65,005,505</b>	<b>58,691,767</b>	<b>54,526,609</b>	<b>54,103,708</b>	<b>68,175,836</b>



IDAHO POWER COMPANY  
SUMMARY OF REVENUE FORECAST  
**IDAHO JURISDICTION**  
BY MONTH BY RATE  
12 MONTHS ENDING DECEMBER 31, 2011

<u>Tariff Description</u>	July	August	September	October	November	December	Total
1 - Residential Serv.	30,395,415	36,502,570	31,130,504	24,377,881	27,386,676	37,174,568	378,909,490
3 - Residential Master Mete	22,948	27,230	26,610	21,651	27,321	38,819	372,614
4 - Residential Energy Wat	3,265	4,109	3,955	2,984	3,255	5,490	55,463
5 - Residential TOD	5,366	7,319	6,908	4,894	5,550	8,051	87,858
7 - Small General Serv.	1,228,844	1,307,793	1,229,798	1,066,460	1,050,950	1,290,772	14,360,802
9 - Large General Serv.	17,897,576	18,444,692	17,673,262	15,481,342	14,679,583	15,384,787	189,089,746
15 - Dusk/Dawn Lighting	94,390	94,453	94,380	94,050	93,886	93,806	1,128,744
19 - Uniform Rate Cont.	7,898,670	8,108,622	8,129,258	6,553,011	6,892,452	6,586,804	82,872,110
24 - Irrigation & Pump.	24,950,137	22,939,041	19,708,958	8,351,940	1,253,794	159,787	103,066,526
40 - Unmetered Gen. Serv.	88,358	87,820	88,422	87,600	87,676	87,706	1,062,116
41 - Municipal St. Light.	229,302	229,982	231,808	232,330	235,475	238,779	2,786,748
42 - Traffic Control Light.	13,696	13,622	12,786	12,281	11,776	12,185	160,191
<b>Total Idaho Rates</b>	<b>82,827,967</b>	<b>87,767,253</b>	<b>78,336,649</b>	<b>56,286,424</b>	<b>51,728,394</b>	<b>61,081,554</b>	<b>773,952,408</b>
<u>Special Contracts</u>							
26 - Micron	1,461,263	1,413,484	1,333,719	1,315,148	1,264,628	1,272,292	16,186,334
29 - J R Simplot	507,870	501,371	489,720	499,147	496,895	510,822	5,892,298
30 - DOE	514,387	511,499	499,527	617,775	694,373	798,621	7,661,384
<b>Total Specials</b>	<b>2,483,520</b>	<b>2,426,354</b>	<b>2,322,966</b>	<b>2,432,070</b>	<b>2,455,896</b>	<b>2,581,735</b>	<b>29,740,016</b>
<b>Total Idaho Firm Sales</b>	<b>85,311,487</b>	<b>90,193,607</b>	<b>80,659,615</b>	<b>58,718,494</b>	<b>54,184,290</b>	<b>63,663,289</b>	<b>803,692,424</b>

STATE OF OREGON

<u>Tariff Description</u>	January	February	March	April	May	June
9S	688,016	642,194	589,112	508,310	448,608	494,413
9P	72,228	71,527	63,847	66,241	61,827	63,864
9T	15,811	10,924	10,637	15,935	12,916	10,664
Total Rate 9	776,055	724,645	663,596	590,486	523,351	568,941
19S	0	0	0	0	0	0
19P	658,821	719,531	639,752	661,938	636,101	729,631
19T	171,506	40,954	75,277	390,296	220,884	126,938
Total Rate 19	830,327	760,485	715,029	1,052,234	856,985	856,569
24S	6,582	5,816	5,644	7,457	205,188	670,744
24T	0	0	0	0	0	0
Total 24	6,582	5,816	5,644	7,457	205,188	670,744

STATE OF OREGON

<u>Tariff Description</u>	July	August	September	October	November	December	Total
9S	543,113	582,757	567,078	577,244	634,183	700,887	6,975,915
9P	67,844	72,468	73,854	60,709	59,711	63,982	798,102
9T	13,212	13,017	13,551	12,590	11,598	14,142	154,997
Total Rate 9	624,169	668,242	654,483	650,543	705,492	779,011	7,929,014
19S	0	0	0	0	0	0	0
19P	770,682	713,167	761,735	626,043	684,463	611,201	8,213,065
19T	418,852	387,346	451,751	377,976	187,416	274,197	3,123,393
Total Rate 19	1,189,534	1,100,513	1,213,486	1,004,019	871,879	885,398	11,336,458
24S	761,495	829,483	724,240	195,883	30,759	10,980	3,454,271
24T	0	0	0	0	0	0	0
Total 24	761,495	829,483	724,240	195,883	30,759	10,980	3,454,271

IDAHO JURISDICTION

Tariff Description	January	February	March	April	May	June
9S	13,989,541	13,876,547	13,389,460	12,986,448	12,507,024	14,267,675
9P	1,419,959	1,439,985	1,334,967	1,427,609	1,388,796	1,444,591
9T	8,816	8,009	7,837	9,021	11,587	10,632
Total Rate 9	15,418,316	15,324,541	14,732,264	14,423,078	13,907,407	15,722,898
19S	30,287	30,297	26,772	27,915	26,159	26,438
19P	6,665,436	6,584,273	6,099,583	6,152,056	6,025,041	6,282,271
19T	129,253	114,348	113,561	125,100	97,013	147,490
Total Rate 19	6,824,976	6,728,918	6,239,916	6,305,071	6,148,213	6,456,199
24S	114,897	111,402	128,406	943,853	6,619,211	17,785,100
24T	0	0	0	0	0	0
Total 24	114,897	111,402	128,406	943,853	6,619,211	17,785,100

IDAHO JURISDICTION

<u>Tariff Description</u>	July	August	September	October	November	December	Total
9S	16,205,655	16,616,989	15,776,038	13,918,926	13,171,838	13,890,656	170,596,797
9P	1,678,337	1,816,511	1,887,627	1,554,656	1,499,747	1,485,033	18,377,818
9T	13,584	11,192	9,597	7,760	7,998	9,098	115,131
Total Rate 9	17,897,576	18,444,692	17,673,262	15,481,342	14,679,583	15,384,787	189,089,746
19S	26,408	27,318	27,093	23,223	29,045	26,516	327,471
19P	7,692,934	7,914,109	7,918,654	6,394,518	6,731,974	6,433,232	80,894,081
19T	179,328	167,195	183,511	135,270	131,433	127,056	1,650,558
Total Rate 19	7,898,670	8,108,622	8,129,258	6,553,011	6,892,452	6,586,804	82,872,110
24S	24,950,137	22,939,041	19,708,958	8,351,940	1,253,794	159,787	103,066,526
24T	0	0	0	0	0	0	0
Total 24	24,950,137	22,939,041	19,708,958	8,351,940	1,253,794	159,787	103,066,526

Idaho Power/1003  
Witness: Matthew T. Larkin

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Retail Revenue Forecast Derivation

July 29, 2011

2011 Retail Revenue Forecast Derivation

Rate	State	Jan-11	Feb-11	Mar-11	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Total	Rates 9/1/2011			
Rate 01	IDAHO	Bills	396398.9	395863.4	395993	396292.4	396310.7	396786.7	397034.3	397484.8	397840.3	398505.8	398944.5	399731	4767185.8	4.000000		
		Min Bills	2236.2	3026.0	3229.4	3184.0	3568.6	3519.2	3353.9	3436.5	3854.5	3436.5	3299.3	3006.5	2429.4	38143.5	2.000000	
		S 0-800	1,098	9,134	10,311	6,913	2,252	88,603.613	258,132.926	274,541.633	187,085.330	187,085.330	3,868.692	6,320	(51,740)	812,216.482	0.071026	
		S 801-2000	780	5,068	5,391	3,256	776	26,246.850	99,923.713	144,839.162	73,525.643	73,525.643	1,192.559	2,342	(32,652)	345,712.888	0.086530	
		S Over 2000	495	1,944	1,790	828	120	3,458.716	15,107.564	27,653.983	11,535.508	11,535.508	157.537	388	(15,355)	57,903.518	0.103836	
		N 0-800	266,877.892	294,935.077	265,303.309	244,876.992	228,669.803	151,769.231	2,520.365	86,486.816	242,237.248	261,150.494	268,105.156	268,105.156	162,886.941	2,302,960.245	0.068259	
		N 801-2000	189,521.297	163,637.155	138,694.325	115,313.390	78,822.168	44,958.259	975.638	33,989.831	74,671.831	96,769.151	162,886.941	162,886.941	76,600.964	1,100,244.240	0.073621	
		N Over 2000	120,278.399	62,756.807	46,044.094	29,343.004	12,227.864	5,924.439	147.508	4,254	9,864.144	16,021.128	76,600.964	76,600.964	384,541.379	0.084662		
		Total kWh	576,679,860	521,344,984	450,059,219	389,544,384	319,742,803	320,961,109	376,807,715	447,047,907	387,955,825	331,982,011	373,948,822	407,493,313	5,003,573,752			
		Rev	43,409,084	38,493,129	33,219,547	28,791,425	23,583,942	24,365,149	30,395,415	36,502,670	31,130,504	24,377,881	27,386,676	37,174,568	378,909,490			
		Total kWh	685,712	587,982	500,091	447,345	338,779	330,386	318,414	378,053	389,414	300,340	330,340	379,320	539,475	284	4.000000	
		Rev	49,318	42,302	35,992	32,205	24,410	23,808	22,948	27,230	26,610	21,651	21,651	27,321	38,819	372,614	0.071794	
		Rate 03	IDAHO	Bills	42	43.2	42	42	42	43	43.4	42	42.4	41.7	42	43.9	509.6	4.000000
Min Bills	0.0			0.3	0.0	0.0	0.0	0.0	0.1	0.0	0.2	0.0	0.0	0.0	0.6	2.000000		
S EW	0			0	0	0	0	0	180	213	213	213	0	0	0	606	0.200000	
S Recd kWh	0			0	0	0	0	3,082	41,346	53,132	50,116	614	0	0	0	148,289	0.073366	
N 0-800	35,695			40,684	35,345	32,943	32,882	31,552	298	0	0	661	29,413	31,266	32,327	303,287	0.068259	
N 801-2000	36,555			36,076	28,776	23,563	19,304	14,412	32	0	0	121	10,184	13,200	29,870	214,984	0.073621	
N Over 2000	38,599			12,031	6,459	4,901	1,239	750	0	0	0	884	502	11,497	76,833	0.084662		
Total kWh	110,949			88,790	71,561	63,228	53,426	49,796	41,856	51,311	53,345	51,311	41,075	44,988	73,694	743,939		
Rev	8,492			6,544	5,249	4,634	3,873	3,613	3,265	4,109	3,955	2,984	2,984	3,255	5,490	55,463		
Total kWh	685,712			587,982	500,091	447,345	338,779	330,386	318,414	378,053	389,414	300,340	330,340	379,320	539,475	284	4.000000	
Rev	49,318			42,302	35,992	32,205	24,410	23,808	22,948	27,230	26,610	21,651	21,651	27,321	38,819	372,614	0.071794	
Rate 04	IDAHO			Bills	42	43.2	42	42	42	43	43.4	42	42.4	41.7	42	43.9	509.6	4.000000
				Min Bills	0.0	0.3	0.0	0.0	0.0	0.0	0.1	0.0	0.2	0.0	0.0	0.0	0.6	2.000000
		S EW	0	0	0	0	0	0	180	213	213	213	0	0	0	606	0.200000	
		S Recd kWh	0	0	0	0	0	3,082	41,346	53,132	50,116	614	0	0	0	148,289	0.073366	
		N 0-800	35,695	40,684	35,345	32,943	32,882	31,552	298	0	0	661	29,413	31,266	32,327	303,287	0.068259	
		N 801-2000	36,555	36,076	28,776	23,563	19,304	14,412	32	0	0	121	10,184	13,200	29,870	214,984	0.073621	
		N Over 2000	38,599	12,031	6,459	4,901	1,239	750	0	0	0	884	502	11,497	76,833	0.084662		
		Total kWh	110,949	88,790	71,561	63,228	53,426	49,796	41,856	51,311	53,345	51,311	41,075	44,988	73,694	743,939		
		Rev	8,492	6,544	5,249	4,634	3,873	3,613	3,265	4,109	3,955	2,984	2,984	3,255	5,490	55,463		
		Total kWh	685,712	587,982	500,091	447,345	338,779	330,386	318,414	378,053	389,414	300,340	330,340	379,320	539,475	284	4.000000	
		Rev	49,318	42,302	35,992	32,205	24,410	23,808	22,948	27,230	26,610	21,651	21,651	27,321	38,819	372,614	0.071794	









2011 Retail Revenue Forecast Derivation												
	1984	1984	1984	1984	1984	1984	1984	1984	1984	1984	1984	1984
<b>Rate 40</b>												
<b>In Bills</b>	82.6	82.5	86.2	84.8	83.5	73.9	74.7	72.4	71.6	73.5	74.0	23808
<b>Min Bills</b>	1,346,223	1,343,670	1,343,340	1,336,227	1,339,368	1,331,230	1,332,228	1,319,848	1,320,956	1,321,389	1,321,389	15,000,000
<b>kWh</b>	89,365	89,196	89,174	88,706	88,912	88,358	87,820	87,600	87,676	87,706	87,706	16,000,941
<b>Rev</b>	14,580	13,864	13,988	13,795	13,694	13,696	13,622	12,786	12,281	11,776	12,185	1,062,118
<b>Rate 42</b>												
<b>Bills</b>	316,475	300,930	303,616	299,431	297,029	297,295	296,671	277,537	266,578	255,618	264,480	3,477,113
<b>kWh</b>	14,580	13,864	13,988	13,795	13,694	13,696	13,622	12,786	12,281	11,776	12,185	160,191
<b>Rate 15</b>												
<b>kWh</b>	324,574	324,969	321,982	325,713	325,059	324,931	324,287	323,766	324,301	324,173	325,830	3,895,350
<b>1csg</b>	50,523	53,876	52,270	51,996	51,847	51,943	52,101	51,801	51,607	51,659	49,470	821,210
<b>2csf</b>	54,867	57,785	57,771	57,881	57,886	57,795	58,210	57,783	57,588	57,689	57,913	691,082
<b>4chf</b>	10,076	10,367	10,179	10,076	10,364	10,403	10,386	10,382	10,388	9,804	9,146	121,688
<b>4csa</b>	16,753	17,304	17,101	17,115	16,872	16,598	16,486	16,590	16,644	16,644	16,831	202,062
<b>4csf</b>	70,733	70,014	70,190	69,087	69,713	71,754	71,828	72,279	70,490	70,101	70,410	846,614
<b>1k1f</b>	13,757	14,483	14,120	14,844	16,121	15,542	16,217	17,088	15,930	15,736	15,567	184,079
<b>Total kWh</b>	541,284	548,818	543,614	546,712	547,882	546,965	549,689	546,928	546,928	545,817	545,068	6,562,095
<b>Lamps</b>	39	1csg	8,322	8,352	8,332	8,332	8,315	8,302	8,315	8,312	8,355	99,882
	74	2csa	728	703	704	702	704	700	697	688	669	8,395
	74	2csf	781	782	782	781	781	778	778	780	781	9,339
	155	4chf	65	65	67	67	67	67	67	63	59	785
	157	4csa	107	109	109	106	105	106	106	106	107	1,287
	157	4csf	451	446	447	457	458	460	449	447	448	5,393
	362	1k1f	38	41	41	45	45	47	44	43	43	509
<b>Fac Chg</b>	7,025	7,234	7,034	7,106	7,100	7,243	7,230	7,217	7,043	7,060	7,051	85,451
<b>Min Bill</b>	20.7	12.8	24.6	20.3	12.3	17.4	13.4	15.1	20.6	19.8	16.0	209.5
<b>kWh</b>	541,284	548,818	543,614	547,882	546,965	549,689	546,928	546,928	546,928	545,817	545,068	6,562,095
<b>Rev</b>	93,768	94,399	93,559	94,131	94,229	94,390	94,453	94,380	94,050	93,886	93,806	1,128,744

2011 Retail Revenue Forecast Derivation

	36	37	37	37	37	39	39	39	39	39	452	8710000
<b>Rate 41A</b>												
29 70 S	14,746	14,731	14,731	14,721	14,707	14,814	14,788	14,760	14,843	176,809	21,917	7,830000
39 100 S	1,863	1,846	1,837	1,836	1,828	1,828	1,810	1,810	1,826	102	1,179	10,370000
74 200 S	95	96	96	96	98	101	101	101	102	71	814	13,060000
100 250 S	70	66	67	67	67	68	67	67	67	314	3768	0,066290
157 400 S	314	314	314	314	314	314	314	314	314	5,190	62280	23,018,849
<b>Bills</b>	5,190	5,190	5,190	5,190	5,190	5,190	5,190	5,190	5,190	1,968,024	2,013,916	1,616,309
Variable Usage (	2,005,970	1,943,711	1,833,807	1,866,017	1,870,013	1,900,532	1,915,546	1,968,024	2,013,916	134,778	1,616,309	2,786,748
<b>kWh</b>	135,109	134,824	134,816	134,655	134,551	135,383	134,768	134,778	135,636	238,779	2,786,748	
<b>Rev 41A</b>	237,560	233,950	227,516	235,080	229,302	231,808	232,330	235,475	238,779			
<b>Rate 41B</b>												
66 2500 I	0	0	0	0	0	0	0	0	0	0	0	6,430000
68 175 M	8	8	8	8	8	8	8	8	8	8	8	10,160000
155 400 M	7	7	7	7	7	7	7	7	7	7	7	3,740000
388 1000 M	0	0	0	0	0	0	0	0	0	0	0	4,240000
29 70 S	5	5	5	5	5	5	5	5	5	5	5	5,880000
39 100 S	10,767	10,768	10,632	11,433	10,779	10,859	10,810	10,824	10,850	129,462	5,218	6,990000
74 200 S	450	445	445	448	429	430	432	433	433	3,557	41,947	9,720000
100 250 S	3,540	3,519	3,142	3,572	3,515	3,504	3,557	3,553	3,557	1,004	11,769	0,066290
157 400 S	977	958	947	999	988	999	999	999	999	344	4,128	989,036
Variable Usage (	344	344	344	344	344	344	344	344	344	83,157	83,319	2,230000
<b>Rev 41B</b>	82,696	82,379	79,025	85,962	82,245	82,997	83,088	83,157	83,319	0	0	2,230000
<b>Rate 41BM</b>												
39 100 S	0	0	0	0	0	0	0	0	0	0	0	2,310000
74 200 S	0	0	0	0	0	0	0	0	0	0	0	2,300000
100 250 S	16	16	16	16	16	16	16	16	16	16	16	2,290000
157 400 S	9	9	9	9	9	9	9	9	9	9	9	8,570000
<b>Bills</b>	9	9	9	9	9	9	9	9	9	12	12	0,058385
<b>kWh</b>	3,024	3,024	2,992	3,022	3,022	3,022	3,022	3,022	3,022	5,546	5,553	55,318
<b>Rev 41BM</b>	313	313	284	287	287	287	287	287	287	526	526	5,199
<b>Rate 41M</b>												
<b>Bills</b>	155	155	159	162	163	169	170	171	171	1963	1963	8,570000
<b>kWh</b>	305,014	252,688	248,292	212,856	171,885	193,366	210,359	261,831	300,292	2,683,882	2,683,882	0,058385
<b>Rev 41M</b>	19,442	16,334	16,107	14,029	11,694	12,831	13,949	17,014	19,298	176,204	176,204	











BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Revenue Requirement by Functional Category

July 29, 2011

**IDAHO POWER COMPANY**  
**Revenue Requirement By Functional Category**  
**State of Oregon**  
**Test Year - 2011**

	<u>Total Revenue Requirement</u>	<u>% of Total</u>
<u>Generation</u>		
Demand-Related	\$ 10,427,415	22.8%
Energy-Related	15,370,848	33.6%
 <u>Transmission</u>		
	4,573,960	10.0%
 <u>Distribution</u>		
Demand-Related	11,661,526	25.5%
<u>Customer-Related</u>	<u>3,687,669</u>	<u>8.1%</u>
Total	\$ 45,721,417	100.0%

Idaho Power/1005  
Witness: Matthew T. Larkin

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Marginal Cost Analysis

July 29, 2011

## **2011 Marginal Cost Analysis – Technical Description**

The following is a technical description of the 2011 Marginal Cost Analysis. The concept and design of the 2011 Marginal Cost Analysis is from the National Economic Research Associates, Inc. (“NERA”) marginal cost model. The NERA model is constantly being refined but the basic concepts and methods have remained the same since Idaho Power began using this method. In this analysis, forecasted growth-related generation, transmission and distribution costs are identified and classified into the appropriate energy-, demand- and customer-related components for use in the Company’s class cost-of-service model. The energy-related marginal costs include net power supply costs, variable operation and maintenance (O&M) expenses, fuel inventory and losses. Demand-related costs are comprised of generation, transmission and distribution capacity investment and associated fixed O&M expenses. Customer-related costs include investment costs that are attributable to anticipated growth in the number of customers served.

### **Generation Marginal Costs**

Marginal Cost of Energy. The marginal costs of energy were determined from the simulated operation of the Company’s power supply system over 83 streamflow conditions for the five-year period 2011 through 2015. Base case net power supply expenses were quantified and the model was run a second time with fifty megawatts of load added across all hours. The monthly difference in power supply expenses between the base run and the “base-plus-50-MW run” was averaged over the five-year period and divided by the difference in monthly megawatt hours to produce an average monthly marginal cost per megawatt hour. The 2011 test year net power supply run was used for the 2011 base marginal cost run. For the years 2012 through 2015, projected loads along with currently planned resource additions at the time of the study were used. The 2011 test year gas prices were used, adjusted for each of the successive years using the Bureau of Labor Statistics: Produce Price Index; Moody’s Analytics. Coal plant operating characteristics, with the exception of coal costs, and CSPP purchased power volumes from the 2011 analysis were used for the entire period, 2011 through 2015. Added to the average monthly marginal cost per megawatt hour was the revenue requirement associated with marginal fuel inventory, and the marginal variable O&M expense. This loaded energy cost was then increased for losses at the transmission and distribution levels of service. Complete monthly marginal energy costs can be found on Schedule 1.

Marginal Cost of Generation Capacity. The annual marginal cost of generation capacity was derived from the inclusion of the Danskin CT1 Power Plant into rate base (Case No. IPC-E-08-1) and from Idaho Power’s 2011 Integrated Resource Plan (“IRP”). The peaking resource selected from the resource portfolio to quantify the marginal cost of capacity was the Danskin CT1 Combustion Turbine. Plant investment included in the Company’s application was used and fixed O&M expenses were obtained from the 2011 IRP Technical Appendix, p.82. The reserve margin is 10% (2011 IRP). The marginal cost of generation capacity can be found on Schedule 2, page 1 of 2.

Seasonalization of Marginal Cost of Generation Capacity. The seasonalization of the marginal cost of generation capacity is based on information from the 2011 IRP. The Company plans new peaking generation capacity based on monthly peak hour load surplus/deficiency data, assuming 90th percentile streamflow conditions, 70th percentile

average load and 95th percentile peak-hour load (2011 IRP Technical Appendix). On this basis, during the five years 2011 through 2015, the IRP identified the months of June, July, August, September, and December as months of anticipated deficiency. These are the months that were assigned generation capacity costs in the 2011 Marginal Cost Analysis. The relative sizes of the five-year average monthly deficiencies were used to define the share of annual capacity cost assigned to each month as shown on Schedule 2, page 2 of 2.

### **Marginal Cost of Transmission Capacity**

The marginal cost of transmission reflects planned investment included in the capital budget for the next ten years. The investment costs are for the years 2011 through 2020. Demand related transmission O&M was estimated using historic data for the period 2006 through 2010. Marginal transmission costs are displayed on Schedule 3, page 1 of 2.

Seasonalization of the Marginal Cost of Transmission. The marginal cost of transmission capacity represents the sum of two distinct components; 1) network integration cost associated with integrating a new network resource to meet native load service requirements and 2) the costs associated with planned transmission system expansion. Since the resource integration portion of marginal transmission investment is driven by the need for new generation resources, as identified in the 2011 IRP, these costs were assigned to months in the same manner as the marginal cost of generation capacity. The investment in the second component of costs, new system expansion, is driven by peak load growth on the system, irrespective of the introduction of new resources onto the grid. Therefore, that portion of marginal costs is assigned to the months based on relative monthly peak load growth from 2011 through 2020. The two components are summed by month. This method results in the assignment of marginal costs of transmission capacity to each of the twelve months of the year. The seasonal assignment of marginal transmission capacity costs can be found on Schedule 3, page 2 of 2.

### **Distribution Marginal Costs**

To quantify marginal distribution costs, the Company used the “facilities cost method,” as described by NERA. Under this method costs are divided into three categories: costs that increase with growth in actual peak demand, design demand-related costs, and customer-related costs. The first category is comprised of distribution substation carrying costs and related O&M expenses. The second category is comprised of the carrying costs of plant located between the distribution substation and the service drop, as well as associated O&M expense. This includes primary lines, secondary lines, poles, transformers and associated equipment. The service drop is considered by NERA to be part of the design demand-based category, but Idaho Power’s practice is to include the service drop in customer-related costs. The Company deviates from NERA methodology in this manner because the costs of the service drop are the direct result of providing service to a specific new customer, and do not vary with changes in the customer’s load. By categorizing service drops as customer-related, the Company believes that a more precise attribution of customer cost responsibility to classes results than would otherwise be the case. Customer-related costs also include the carrying cost of the meter and associated O&M expense, customer service & informational expense, and customer accounts expense.

Distribution Substation Costs. In order to quantify growth-related distribution substation costs, projected investment in new upgrades and substation was identified for the period 2011 through 2015. The forecast growth in distribution peak load was derived by multiplying the forecast system peak load (2011 IRP Technical Appendix, p. 4-5) by a percentage that reflects the 2010 ratio of distribution peak load to total system peak load. Projected investment was then divided by forecast growth in distribution peak load to arrive at marginal distribution substation cost per kW as shown on Schedule 4, page 1 of 2. Marginal distribution substation O&M expense was developed using the Company's total forecast annual distribution O&M expense for the planning period, to which a ratio was applied reflecting the historical relationship between distribution substation O&M expense and total distribution O&M expense. The forecast annual distribution substation O&M expenses were then divided by the forecast distribution peak load and averaged, resulting in marginal distribution substation O&M cost per kW as shown on Schedule 4, page 2 of 2.

Marginal Distribution Facilities Cost. The second cost category is distribution facilities cost, which covers distribution components between the substation and the service drop, as well as associated O&M expense. The first step in quantifying these costs was to price each feeder on the system at current prices. These costs were then allocated to rate classes based on the relative demand of each class by feeder. Finally, each rate class's total cost was divided by its share of total feeder capacity to arrive at a marginal distribution facilities cost per kW, which can be found on Schedule 5, page 1 of 2. Marginal distribution facilities O&M expense was developed using the Company's total forecast annual distribution O&M expense for the planning period, to which a ratio was applied reflecting the historical relationship between distribution facilities O&M expense and total distribution O&M expense. The forecast annual distribution facilities O&M expense was then divided by the forecast peak load and averaged, resulting in marginal distribution facilities O&M cost per kW as shown on Schedule 5, page 2 of 2. Per NERA methodology, it was assumed that marginal distribution facilities O&M expense for a secondary customer is twice the expense of a primary customer.

Marginal Meter Cost. Marginal meter investment per customer for each rate class was developed by determining the types of meters the Company is currently installing for each rate class, then pricing these meters at current cost. A summary of these costs by rate class can be found on Schedule 6, page 1 of 4. Associated O&M was developed using the Company's total forecast annual distribution O&M expense for the planning period, to which a ratio was applied reflecting the historical relationship between meter O&M expense and total distribution O&M expense. A weighted number of customers by class was then derived by multiplying the number of customers in each class by a factor reflecting the relative cost of meters per customer. This calculation is illustrated on Schedule 6, page 4 of 4. The forecast annual meter O&M expenses were then divided by the forecast number of weighted customers to arrive at a system average expense in dollars per weighted customer for each year of the planning period. The results for the five years were then averaged, producing a system average meter O&M expense per weighted customer, displayed on Schedule 6, page 3 of 4. This system average was multiplied by class factors based on relative meter cost to estimate the expense for each actual customer by rate class as shown on Schedule 6, page 2 of 4.

Marginal Service Drop Costs. The cost of the service drop was developed for both single-phase and three-phase service. A weighted cost was applied to each rate class based on

the proportion of single-phase to three-phase meters of new meter installs during the period January through December 2010. Only overhead service was calculated because the Company has a rule in place that provides for a charge to the customer when underground service attachments are desired. The costs of both a single-phase and three-phase drop are shown on Schedule 7, along with the relative percentages of single-phase and three-phase customers by rate class.

Marginal Customer Accounts Expense. To estimate marginal customer accounts expense, total customer accounts expense was forecasted for each of the years 2011 through 2015. These annual expense amounts were then divided by the forecasted number of weighted customers for the same time period. The result was a system average expense in dollars per weighted customer for each year of the planning period. The weighted number of customers was derived by multiplying the number of customers in each class by a factor reflecting the relative size of this expense, per customer, for each class. This calculation is illustrated on Schedule 8, page 3 of 3. The average expense values for the five years were then averaged, producing a system average customer accounts expense per weighted customer as displayed on Schedule 8, page 2 of 3. This system average was then multiplied by the class factors to arrive at customer accounts expense per actual customer by class as shown on Schedule 8, page 1 of 3.

Marginal Customer Service & Informational Expense. Customer service & informational expense was forecasted for the planning period 2011 through 2015, then divided by the forecast number of customers for the same period and averaged, producing marginal customer service & informational expense per customer as shown on Schedule 9. It is assumed that customer service & informational expense per customer does not vary greatly across classes, so these costs were not weighted in the same manner as other customer-related costs.

Development of Marginal Annual Distribution Costs. To arrive at marginal annual distribution costs, both substation and facilities costs were adjusted in the same manner. First, these costs were adjusted for general plant loading, then the annual economic carrying charge was applied and A&G loading was added. Related expenses were adjusted for A&G loading, and the revenue requirement for working capital was added, resulting in total annual marginal distribution costs per kW. A summary of annual marginal distribution substation costs and annual marginal distribution facilities costs can be found on Schedules 10 and 11, respectively. Customer-related costs were adjusted for carrying charges and loading in a similar manner. Meter investment and the service drop were adjusted for general plant loading, the annual economic carrying charge was applied and A&G loading was added. Related expenses were adjusted for A&G loading, and the revenue requirement for working capital was added, resulting in total annual customer-related marginal distribution costs per customer as shown on Schedule 12.

Development of Loaders and Factors. Annual economic carrying charge rates were prepared for a combustion turbine, transmission plant, and distribution plant. The carrying charges reflect the 2011 test year weighted cost of capital and resource lives of each asset as derived in the Company's 2003 depreciation study. A summary of these charges can be found on Schedule 13. General plant, administrative & general, and materials & supplies loading factors were derived from an average of historic data from the period 2006 through 2010. The factor representing the revenue requirement percentage for

working capital was derived using the Company's 2011 test year weighted cost of capital and expected tax rates. A summary of loaders is displayed on Schedule 14.



SCHEDULE 1

**IDAHO POWER COMPANY**  
Marginal Cost Analysis 2011  
Marginal Cost of Energy - Dollars/MWh

Line	January	February	March	April	May	June	July	August	September	October	November	December	Annual Avg.
(1) Marginal Generation Cost at Generation 1/	\$34.09	\$31.36	\$29.96	\$27.54	\$28.37	\$25.65	\$41.56	\$42.10	\$38.57	\$39.12	\$40.16	\$45.03	\$35.70
(2) Marginal Fuel Inventory	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07	\$22.07
(3) Cost of Capital & Taxes for Fuel Inventory (2) x 11.62% 2/	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56	\$2.56
(4) Marginal Variable O & M 3/	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00	\$2.00
(5) Marginal energy cost at Generation	\$38.65	\$35.92	\$34.52	\$32.10	\$32.93	\$30.21	\$46.12	\$46.66	\$43.13	\$43.68	\$44.72	\$49.59	\$39.85
Average System Loss Factor Coefficients at: 4/													
(6) Transmission	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035	1.035
(7) Distribution Station	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050	1.050
(8) Distribution Primary	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074	1.074
(9) Distribution Secondary	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109	1.109
Marginal Energy Cost at Service Level													
(10) Power Supply (5)	\$38.65	\$35.92	\$34.52	\$32.10	\$32.93	\$30.21	\$46.12	\$46.66	\$43.13	\$43.68	\$44.72	\$49.59	\$39.85
(11) Transmission (6) x (5)	\$40.01	\$37.18	\$35.73	\$33.23	\$34.09	\$31.27	\$47.74	\$48.30	\$44.64	\$45.21	\$46.29	\$51.33	\$41.25
(12) Distribution Station (7) x (5)	\$40.59	\$37.72	\$36.25	\$33.71	\$34.58	\$31.73	\$48.43	\$49.00	\$45.29	\$45.87	\$46.96	\$52.07	\$41.85
(13) Distribution Primary (8) x (5)	\$41.51	\$38.58	\$37.08	\$34.48	\$35.37	\$32.45	\$49.54	\$50.12	\$46.33	\$46.92	\$48.03	\$53.26	\$42.81
(14) Distribution Secondary (9) x (5)	\$42.87	\$39.84	\$38.29	\$35.60	\$36.52	\$33.51	\$51.15	\$51.75	\$47.84	\$48.45	\$49.60	\$55.00	\$44.20

1/ Aurora Power Supply Model 2011 to 2015  
2/ Schedule 14, Based on 2011 Test Year Cost of Capital  
3/ IPCo 2011 IRP Technical Appendix - Page 82  
4/ Schedule 15

**IDAHO POWER COMPANY**  
**MARGINAL COST ANALYSIS 2011**  
**ANNUAL GENERATION CAPACITY COST: DOLLARS PER KW**

(1) Investment (\$/kw) 1/	\$339.12
(2) General Plant Loading (1) x 1.08 2/	\$366.68
(3) Economic Carrying Charge Rate 3/	7.18%
(4) A&G Loading .53% 4/	0.53%
(5) Total Carrying Charge	7.71%
(6) Annual Cost (\$/kw) (2) x (5)	\$28.26
(7) Demand related fixed O&M 5/	\$4.00
(8) A&G loading (7) x 1.399 6/	\$5.60
(9) Marginal Demand Related Costs (6) + (8)	\$33.85
Working Capital	
(10) Materials & Supplies (2) x 1.14%	\$4.17
(11) Revenue Requirement for Materials & Supplies (10) x 11.62%	\$0.48
(12) Total Marginal Demand Related Costs (9) + (11) rounded	\$34.34
(13) Adjusted for reserve margin (10%) 7/	<b>\$38.00</b>

Notes

1/ Total Investment of Danskin CT1 \$57,650,861 / 170 MW (Case No. IPC-E-08-01, Exhibit 2)

2/ Schedule 14. Average general plant loading 2006-2010

3/ Schedule 13. Based on 2011 Test Year Cost of Capital

4/ Average A & G expenses 2006 - 2010 applicable to plant related expenses, Schedule 14

5/ Estimated cost of a simple cycle combustion turbine , IPCo 2011 IRP Technical Appendix, Page 82

6/ Average A & G expenses 2006 - 2010 applicable to non-plant related expenses, Schedule 14

7/ IPCo 2011 IRP - Page 115

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Seasonalized Generation Capacity Marginal Costs**

	(1)	(2)	(3)
	<u>% Share</u>	<u>\$/kw/year</u>	<u>Monthly</u>
<u>Month</u>	<u>of Total 1/</u>	<u>\$38.00</u>	<u>Marginal</u>
			<u>Cost</u>
			(1) X (2)
(1) <b>Jan</b>	0.00%		0.00
(2) <b>Dec</b>	0.00%		0.00
(3) <b>Mar</b>	0.00%		0.00
(4) <b>Apr</b>	0.00%		0.00
(5) <b>May</b>	0.00%		0.00
(6) <b>Jun</b>	22.20%		8.44
(7) <b>Jul</b>	30.30%		11.51
(8) <b>Aug</b>	9.13%		3.47
(9) <b>Sep</b>	33.45%		12.71
(10) <b>Oct</b>	0.00%		0.00
(11) <b>Nov</b>	0.00%		0.00
(12) <b>Dec</b>	4.93%		1.87
(13) <b>Sum</b>	100.00%		38.00

Notes

1/ G & T Assignment Factors Workpaper  
seasonalized based on average monthly share of peak hour deficiencies  
for the five year period 2011-2015. Source: 2011 IRP Technical Appendix

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Annual Transmission Marginal Costs**  
**Dollars/kw**

	Integration of New Resources	Planned System Expansion	Total
	(1)	(2)	(1) + (2)
(1) Investment (\$/kw)	\$52.55	\$1,744.69	
(2) With General Plant Loading (1) x 1.08 1/	\$56.82	\$1,886.50	
(3) Economic Carrying Charge Rate 2/	6.12%	6.12%	
(4) A&G Loading .53% 3/	0.53%	0.53%	
(5) Total Carrying Charge	6.65%	6.65%	
(6) Annual Cost (\$/kw) (2) x (5)	\$3.78	\$125.39	
(7) Demand related O&M 4/	\$6.72	\$6.72	
(8) With A&G loading (7) x 1.399 5/	\$9.40	\$9.40	
(9) Marginal Demand Related Costs (6) + (8)	\$13.18	\$134.79	
 Working Capital			
(10) Materials & Supplies (2) x 1.14%	\$0.65	\$21.43	
(11) Revenue Requirement and Taxes for Materials & Supplies (10) x 11.62% 6/	\$0.08	\$2.49	
(12) Total Marginal Demand Related Costs (9) + (10) + (11) Rounded	\$13.26	\$137.28	
(13) Total Annual Transmission Marginal Costs (rounded)	<b>\$13.00</b>	<b>\$137.00</b>	<b>\$ 150.00</b>

Notes:

- 1/ Average general plant loading 2006 - 2010, Schedule 14
- 2/ Schedule 13. Based on 2011 Test Year Cost of Capital
- 3/ Average A & G expenses 2006 - 2010 applicable to plant related expenses, Schedule 14
- 4/ Average O&M 2006 - 2010 w/o accts. 565 & 567
- 5/ Average A & G expenses 2006 - 2010 applicable to non-plant related expenses, Schedule 14
- 6/ Schedule 14. Based on 2011 Test Year Cost of Capital

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Seasonalized Transmission Marginal Costs**  
**Dollars / kW**

	<u>Integration of New Resources</u>			<u>Planned System Expansion</u>			<u>TOTAL</u>
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
<u>Month</u>	<u>% Share of Total 1/</u>	<u>\$/kw/year 2/ \$13.00</u>	<u>Monthly Marginal Cost</u> (1) X (2)	<u>% Share of Total 3/</u>	<u>\$/kw/year 4/ \$137.00</u>	<u>Monthly Marginal Cost</u> (1) X (2)	<u>Monthly Marginal Cost</u> (3) + (6)
(1) <b>Jan</b>	0.00%		\$0.00	5.03%		\$6.89	6.89
(2) <b>Feb</b>	0.00%		\$0.00	3.58%		\$4.90	4.90
(3) <b>Mar</b>	0.00%		\$0.00	4.20%		\$5.75	5.75
(4) <b>Apr</b>	0.00%		\$0.00	2.68%		\$3.67	3.67
(5) <b>May</b>	0.00%		\$0.00	9.52%		\$13.05	13.05
(6) <b>Jun</b>	22.20%		\$2.89	14.84%		\$20.33	23.22
(7) <b>Jul</b>	30.30%		\$3.94	16.28%		\$22.30	26.24
(8) <b>Aug</b>	9.13%		\$1.19	13.66%		\$18.72	19.91
(9) <b>Sep</b>	33.45%		\$4.35	12.04%		\$16.50	20.85
(10) <b>Oct</b>	0.00%		\$0.00	6.30%		\$8.63	8.63
(11) <b>Nov</b>	0.00%		\$0.00	5.66%		\$7.75	7.75
(12) <b>Dec</b>	4.93%		\$0.64	6.20%		\$8.50	9.14
(13) <b>Sum</b>	100.00%		\$13.00	100.00%		\$137.00	150.00

Notes:

- 1/ Seasonalized based on average monthly share of peak hour deficiencies for the five year period 2011-2015. Source: 2011 IRP Technical Appendix G & T Assignment Factors Workpaper
- 2/ Schedule 3, page 1 of 2
- 3/ Seasonalized based on monthly share of peak hour load growth between 2011 and 2020  
Source: 2011 IRP Technical Appendix G & T Assignment Factors Workpaper
- 4/ Schedule 3, page 1 of 2

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Derivation of Marginal Distribution Substation Investment**

(1) Investment in Load Related Additions to Distribution Substation Plant, 2011 - 2015 (Thousands of 2010 Dollars)	\$37,251
(2) Additions to Distribution Peak Load 2011 - 2015 in MW	331
(3) Marginal Investment in Load Related Distribution Substation Facilities per Kilowatt (2010 Dollars) (1) / (2)	<b>\$112.63</b>

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Distribution Substation O&M Expenses per kW of Distribution Peak Load**  
**(2010 dollars)**

<u>Year</u>	<u>Total Distribution Substation Expenses 1/ (Thousand Dollars)</u>	<u>Distribution Peak Load (MW)</u>	<u>Substation Expenses Per kW of Peak Load (Dollars)</u>
	(1)	(2)	(1) / (2) (3)
(1) 2011	\$5,644	3,429	1.65
(2) 2012	\$5,654	3,489	1.62
(3) 2013	\$5,618	3,594	1.56
(4) 2014	\$5,626	3,678	1.53
(5) 2015	\$5,639	3,760	1.50
(6) Estimated Annual Distribution Substation O&M Expenses for the Planning Period			<b>\$1.57 per kw</b>

1/ Distribution substation expenses are total substation O&M expenses (Accounts 582 and 592) and overheads allocated to substation O&M expenses. Operation overheads (Accounts 580 and 588) and maintenance overheads (Account 590) were allocated to substations based on the relative importance of these expenses in total operation and maintenance (excluding overhead), respectively.

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Distribution Facilities Investment by Rate Class**

Rate 01	\$444
Rate 07	\$280
Rate 09P	\$233
Rate 09S	\$350
Rate 19P	\$137
Rate 24	\$399
Rates 15,41,42	\$278
Rate 40	\$358



**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Distribution Facilities O&M Expenses per kW**  
**(2010 dollars)**

Year	Distribution Facilities O&M Expenses <small>--(1000 Dollars)--</small>	Total Peak Distribution Loads <small>-- (MW) --</small>	O&M Expense Per kw <small>---- (Dollars) ---- (1) / (2)</small>	O&M Expense Per kW of Demand Secondary <small>(2010 dollars) .5 x (3)</small>	O&M Expense Per kW of Demand Primary <small>(2010 dollars) .5 x (3)</small>
	(1)	(2)	(3)	(4)	(5)
(1) 2011	\$24,458	3,429	\$7.13	\$3.57	\$3.57
(2) 2012	\$24,501	3,489	\$7.02	\$3.51	\$3.51
(3) 2013	\$24,345	3,594	\$6.77	\$3.39	\$3.39
(4) 2014	\$24,379	3,678	\$6.63	\$3.31	\$3.31
(5) 2015	\$24,436	3,760	\$6.50	\$3.25	\$3.25
(6) Est. Annual Distribution Facilities O&M Expenses for the Planning Period				\$3.41	\$3.41
(7) Estimated Annual Distribution Facilities O&M Expenses for a Primary Customer					<b>\$3.41</b>
(8) Estimated Distribution Facilities O&M Expense for a Secondary Customer:					<b>\$6.82</b>

1/ Distribution facilities expenses are total distribution O&M expenses excluding rents (Account 589), meter expenses (Accounts 586 and 597), street lighting expenses (Accounts 585 and 596), substation expenses (Accounts 582 and 592), expenses related to subtransmission, and overheads allocated to meters and street lighting, substation and subtransmission expenses. Operation overheads (Accounts 580 and 588) and maintenance overheads (Account 590) were allocated to facilities expenses based on the relative importance of these expenses in total operation and maintenance expenses (excluding overheads).

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**SUMMARY OF INSTALLED METERS BY CLASS**  
**(2010 Dollars)**

	<u>Rate</u>	<u>Class</u>	<u>Investment</u>
(1)	Rate 01	Residential	\$378
(2)	Rate 07	Commercial	\$429
(3)	Rate 09 - P	Commercial	\$10,024
(4)	Rate 09 - S	Commercial	\$666
(5)	Rate 09 - T	Commercial	\$10,024
(6)	Rate 19 - P	Industrial	\$13,276
(7)	Rate 19 - T	Industrial	\$13,276
(8)	Rate 24	Irrigation	\$424
(9)	Rates 41,42	Metered Lighting	\$375

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Meter O&M Expense by Customer Class**  
**(2010 dollars)**

<u>Rate</u>	<u>Class</u>		<u>Weighting Factor</u>	<u>Annual Meter Expense Per Customer</u>
			(1)	(1) x \$14.19 (2)
(1) Residential Service	1		1.01	\$14.33
(2) Small General Service	7		1.14	16.18
(3) Large General Service	9P	Primary	26.73	379.30
(4) Large General Service	9S	Secondary	1.78	25.26
(5) Large General Service	9T	Transmission	26.73	379.30
(6) Uniform Rate - Industrial	19P	Primary	35.40	502.33
(7) Uniform Rate - Industrial	19T	Transmission	35.40	502.33
(8) Irrigation	24		1.13	16.03
(9) Metered Lighting	41,42		1.00	14.19

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Meter O&M Expense per Weighted Customer**  
**(2010 dollars)**

<u>Year</u>	<u>Total Meter Operation Maintenance Expenses</u> (Thousand Dollars)	<u>Average Number of Customers</u>	<u>Weighted Average Number of Customers</u>	<u>Meter Expense Per Weighted Customer</u> (Dollars)
	1/		(2) x 1.09 2/	[(1) x 1000]/(3)
	(1)	(2)	(3)	(4)
(1) 2011	\$7,996	498,393	543,248	\$14.72
(2) 2012	\$8,010	507,310	552,968	14.49
(3) 2013	\$7,959	516,390	562,865	14.14
(4) 2014	\$7,970	525,634	572,941	13.91
(5) 2015	\$7,989	535,046	583,200	13.70

(6) Estimated Annual Weighted Meter O&M Expense for the Planning Period 3/

<b>\$14.19</b>
----------------

1/ Total meter expenses are meter operation and maintenance expenses (Accounts 586 and 597) and overheads allocated to meters. Operation overheads (Accounts 580 and 588) and maintenance overheads (Account 590) were allocated to meters expense based on the relative importance of these expenses to total distribution O&M (excluding overhead).

2/ Schedule 6, page 4

3/ Average of 2011 - 2015

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Development of Electric Meter Weighting Factors**

<u>Customer Class</u>			<u>Installed Meter Cost 2010</u>	<u>Weight</u>	<u>Actual Avg 2010 Number of Customers</u>	<u>Weighted Number of Customers</u>	<u>Meter O&amp;M Weighting Factor</u>
			(1)	(1) / 375.00 (2)	(3)	(2) x (3) (4)	(4) / (3) (5)
(1)	Residential Service	1	\$378.00	1.01	407,374	411,448	
(2)	Small General Service	7	\$429.00	1.14	31,289	35,669	
(3)	Large General Service	9P Primary	\$10,024.00	26.73	180	4,798	
(4)	Large General Service	9S Secondary	\$666.00	1.78	30,290	53,915	
(5)	Large General Service	9T Transmission	\$10,024.00	26.73	3	80	
(6)	Uniform Rate - Industrial	19 P & S	\$13,276.00	35.40	117	4,139	
(7)	Uniform Rate Industrial	19T Transmission	\$13,276.00	35.40	4	142	
(8)	Irrigation	24	\$424.00	1.13	17,745	20,052	
(9)	Metered Lighting	41,42	\$375.00	1.00	162	162	
					487,164	530,406	<b>1.09</b>

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Investment Cost of the Service Drop**

Single Phase	\$254
Three Phase	\$349

	<u>Rate 01</u>	<u>Rate 07</u>	<u>Rate 09-P</u>	<u>Rate 09-S</u>	<u>Rate 09-T</u>	<u>Rate 19</u>	<u>Rate 19 T</u>	<u>Rate 24</u>	<u>Rate 42</u>
Percent Single Phase	100%	67%	n/a	31%	n/a	n/a	n/a	27%	94%
Percent Three Phase	0%	33%	n/a	69%	n/a	n/a	n/a	74%	6%

SCHEDULE 7

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Customer Accounts Expense by Customer Class**  
**(2010 Dollars)**

<u>Customer Class</u>	<u>Weighting Factor 1/</u>	<u>Annual Customer Accts Expense Per Customer</u>
		\$39.50 2/
	(1)	(2)
(1) Residential Service            1	1	\$39.50
(2) Small General Service        7	1	\$39.50
(3) Large General Service       9P	1	\$39.50
(4) Large General Service       9S	1	\$39.50
(5) Large General Service       9T	1	\$39.50
(6) Uniform Rate - Industrial    19	14	\$553.00
(7) Uniform Rate Industrial     19T	14	\$553.00
(8) Irrigation                        24	1	\$39.50
(9) Lighting                         40,41,42	1	\$39.50

1/ Schedule 8, page 3

2/ Schedule 8, page 2

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Customer Accounts Expense per Weighted Customer**  
**(2010 Dollars)**

	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
	(1)	(2)	(3)	(4)	(5)
(1) Customer Accounts Expenses (Thousand Dollars)	\$20,443	\$20,478	\$20,348	\$20,376	\$20,424
(2) Customers 1/	498,393	507,310	516,390	525,634	535,046
(3) Weighted Customers Weighting Factor = 1.00	498,393	507,310	516,390	525,634	535,046
(4) Expense per Weighted Customer (Dollars) [(1) / (3)] x 1000	\$41.02	\$40.37	\$39.40	\$38.76	\$38.17
(5) Estimated Annual Expense Per Customer For the Planning Period 2/	-----	-----	<b>\$39.50</b>	-----	-----

1/ Average number of customers

2/ Average of 2011 - 2015



**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**2010 Customer Accounts Expense by Rate Class**

	Account 901	Account 902	Account 903	Account 904	Account 905	Total Expense	2010 Avg Customers	Cost Per Customer	Customer Weights	Weighted Customers
	Total #901 - #905	Account 902	Account 903	Account 904	Total #902 - #904	Total Expense				
Residential	18,455,748	3,117,431	10,750,823	4,587,208	18,455,462	18,799,669	407,374	46.15	1	407,374
Commercial 7	1,196,078	297,053	824,613	74,394	1,196,060	1,218,367	31,289	38.94	1	31,289
Commercial 9	1,559,064	315,006	849,524	394,509	1,559,039	1,588,117	30,472	52.12	1	30,472
Uniform Contracts (19)	76,908	44,520	32,387	0	76,907	78,341	121	647.88	14	1,693
Irrigation	674,086	246,940	460,885	(33,749)	674,076	686,647	17,745	38.69	1	17,745
Unmetered General Service	53,986	0	52,199	1,786	53,985	54,992	1,979	27.79	1	1,979
Municipal Street Lighting	9,224	1,148	8,017	58	9,223	9,396	304	30.91	1	304
Traffic Control Lighting	11,710	2,496	9,214	0	11,710	11,928	349	34.15	1	349
Special Contracts	2,630	1,582	1,068	0	2,630	2,679	4	669.76	15	60
<b>TOTAL</b>	<b>22,039,434</b>	<b>4,026,156</b>	<b>12,988,730</b>	<b>5,024,206</b>	<b>22,039,092</b>	<b>22,450,136</b>	<b>489,638</b>			<b>491,266</b>

Weighting Factor: 1.00

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Customer Service and Informational Expense**  
**(2010 Dollars)**

	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>
	(1)	(2)	(3)	(4)	(5)
(1) Customer Service and Informational Expenses (Thousand Dollars)	\$7,682	\$7,696	\$7,647	\$7,657	\$7,676
(2) Customers 1/	498,393	507,310	516,390	525,634	535,046
(3) Weighted Number of Customers (2) x 1	498,393	507,310	516,390	525,634	535,046
(4) Expense Per Customer (2010 Dollars) [(1) / (3)] x 1000	\$15.41	\$15.17	\$14.81	\$14.57	\$14.35
(5) Estimated Annual Expense Per Customer For the Planning Period 2/	-----	-----	<b>\$14.90</b>	-----	-----

1/ Average number of customers

2/ Average of 2011 - 2015

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Annual Distribution Substation Unit Costs**  
**(2010 dollars)**

		<u>Distribution Substation</u>
(1)	Marginal Investment per kW	1/ \$112.63
(2)	With General Plant Loading (1) x 1.08	2/ 121.78
(3)	Annual Economic Carrying Charge Related to Capital Investment	3/ 6.57%
(4)	A&G Loading (Plant Related)	4/ 0.53%
(5)	Total Annual Carrying Charge (3) + (4)	7.10%
(6)	Annualized Costs (2) x (5)	\$8.64
(7)	Demand Related O&M Expenses	5/ 1.57
(8)	With A&G Loading (7) x 1.399 (Non-Plant Related)	6/ 2.20
(9)	Demand-Related Cost (6) + (8)	\$10.84
Working Capital		
(10)	Material and Supplies (2) x 1.14%	7/ \$1.38
(11)	Total Working Capital (10)	\$1.38
(12)	Revenue Requirement for Working Capital (11) x 11.62%	8/ 0.16
(13)	Total Demand Related Costs (9) + (12)	\$11.00
(14)	Total Annual Marginal Cost per kW	<b>\$11.00</b>

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2/ Schedule 14

3/ Schedule 13

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6/ Schedule 14

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8/ Schedule 14

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Derivation of Annual Distribution Facilities Unit Costs**

	Residential Rate 01	Rate 07	Commercial Rate 09 - P	Rate 09 - S	Industrial Rate 19 - P	Irrigation Rate 24 & 25	Lighting Rates 15,41,42	Unmetered General Rate 40
(1) Marginal Investment per kw	1/ \$444.35	\$279.86	\$232.70	\$349.81	\$136.58	\$399.28	\$278.03	\$357.88
(2) With General Plant Loading (1) x 1.08	2/ 480.47	302.61	251.61	378.24	147.68	431.73	300.63	386.97
(3) Annual Economic Carrying Charge Related to Capital Investment	3/ 6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	6.57%
(4) A&G Loading (plant-related)	4/ 0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	0.53%
(5) Total Annual Carrying Charge (3) + (4)	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%
(6) Annualized Costs (2) x (5)	\$34.10	\$21.48	\$17.86	\$26.84	\$10.48	\$30.64	\$21.33	\$27.46
(7) Facilities Investment O&M Expenses	5/ \$6.82	\$6.82	\$3.41	\$6.82	\$3.41	\$6.82	\$6.82	\$6.82
(8) With A&G Loading [(7) x 1.399 (non plant related)]	6/ \$9.54	\$9.54	\$4.77	\$9.54	\$4.77	\$9.54	\$9.54	\$9.54
(9) Facilities Investment Cost (6) + (8)	\$43.64	\$31.01	\$22.63	\$36.38	\$15.25	\$40.18	\$30.87	\$37.00
Working Capital								
(10) Materials and Supplies (2) x 1.14%	7/ \$5.46	\$3.44	\$2.86	\$4.30	\$1.68	\$4.91	\$3.42	\$4.40
(11) Total Working Capital	\$5.46	\$3.44	\$2.86	\$4.30	\$1.68	\$4.91	\$3.42	\$4.40
(12) Revenue Requirement for Working Capital (12) x 11.62%	8/ \$0.63	\$0.40	\$0.33	\$0.50	\$0.19	\$0.57	\$0.40	\$0.51
(13) Total Facilities Investment Costs (9) + (12)	\$44.27	\$31.41	\$22.96	\$36.88	\$15.45	\$40.75	\$31.27	\$37.51
(14) Total Annual Marginal Cost per kw	<b>\$44.27</b>	<b>\$31.41</b>	<b>\$22.96</b>	<b>\$36.88</b>	<b>\$15.45</b>	<b>\$40.75</b>	<b>\$31.27</b>	<b>\$37.51</b>

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**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Computation of Customer Related Marginal Unit Costs**  
**(2010 Dollars)**

	Residential		Commercial				Industrial		Irrigation Rate 24	Metered Lighting Rates 41.42	Unmetered General Rate 40
	Rate 01	Rate 07	Rate 09 - P	Rate 09 - S	Rate 09 - T	Rate 19	Rate 19 - T				
1/ Meter Investment	(1)	\$378.00	\$10,024.00	\$666.00	\$10,024.00	\$13,276.00	\$13,276.00	\$424.00	\$375.00	\$0.00	
2/ Service Drop		\$254.00	\$0.00	\$319.00	\$0.00	\$0.00	\$0.00	\$324.00	\$259.46	\$0.00	
3/ With General Plant Loading (1) + (2) x 1.08		\$683.37	\$10,838.78	\$1,065.06	\$10,838.78	\$14,355.11	\$14,355.11	\$808.80	\$686.03	\$0.00	
4/ Annual Economic Charge Related to Capital Investment		6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	6.57%	
5/ A&G Loading (Plant Related)		0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	0.53%	
6/ Total (5) + (7)		7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	7.10%	
7/ Annualized Costs (3) x (8)		\$48.50	\$769.18	\$75.58	\$769.18	\$1,018.72	\$1,018.72	\$57.40	\$48.68	\$0.00	
8/ Meter O&M Expense		\$14.33	\$379.30	\$25.26	\$379.30	\$502.33	\$502.33	\$16.03	\$14.19	\$0.00	
9/ Customer Accounts Expenses		\$39.50	\$39.50	\$39.50	\$39.50	\$563.00	\$563.00	\$39.50	\$39.50	\$39.50	
10/ Customer Service and Informational Expenses		\$14.90	\$14.90	\$14.90	\$14.90	\$14.90	\$14.90	\$14.90	\$14.90	\$14.90	
11/ With A&G Loading [(12)+(13)+(14)] x 1.399 (Non-Plant Related)		98.72	606.64	111.43	606.64	1496.99	1496.99	98.51	95.94	76.09	
12/ Customer Related Cost (10) + (15)		\$144.63	\$1,375.83	\$187.01	\$1,375.83	\$2,515.72	\$2,515.72	\$155.91	\$144.63	\$76.09	
13/ Working Capital		\$7.76	\$8.77	\$123.15	\$123.15	\$163.10	\$163.10	\$9.19	\$7.79	\$0.00	
14/ Materials and Supplies (3) x 1.14%		\$0.90	\$1.02	\$1.41	\$1.41	\$18.95	\$18.95	\$1.07	\$0.91	\$0.00	
15/ Revenue Requirement for Working Capital [(21) x 11.62%]		\$145.53	\$154.53	\$1,390.14	\$1,390.14	\$2,534.67	\$2,534.67	\$156.98	\$145.53	\$76.09	
16/ Total Customer Related Costs (18) + (23)		\$145.53	\$154.53	\$1,390.14	\$1,390.14	\$2,534.67	\$2,534.67	\$156.98	\$145.53	\$76.09	
17/ Total Annual Marginal Unit Cost		<b>\$145.53</b>	<b>\$1,390.14</b>	<b>\$188.41</b>	<b>\$1,390.14</b>	<b>\$2,534.67</b>	<b>\$2,534.67</b>	<b>\$156.98</b>	<b>\$145.53</b>	<b>\$76.09</b>	

SCHEDULE 12

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**IDAHO POWER COMPANY  
Marginal Cost Analysis 2011  
Economic Carrying Charges**

(1)	Combustion Turbine	7.18%
(2)	Transmission	6.12%
(3)	Distribution Substation	6.57%
(4)	Distribution Facilities	6.57%
(5)	Meters	6.57%

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Summary of Loaders**

General Plant Loading	1.08
A&G Loading	
Plant-Related	0.53%
Non-Plant Related	1.399
Revenue Requirement for Working Capital & Fuel Inventory	11.62%
Materials and Supplies	1.14%

**IDAHO POWER COMPANY**  
**Marginal Cost Analysis 2011**  
**Loss Factors**

Plant from	DEMAND		
	Served at		
	Trans- mission	Primary	Secondary
Generation & Transmission	1.055	1.100	1.130
Distribution Substation	-----	1.043	1.071
Primary	-----	1.033	1.061
Secondary	-----	-----	1.027

Plant from	ENERGY			
	Served at			
	Trans- mission	Distribution Station	Primary	Secondary
Generation	1.035	1.050	1.074	1.109





BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Summary of Marginal Costs by Customer Class

July 29, 2011



Idaho Power Company  
Marginal Cost Analysis 2011  
2011 TY Revenue Requirement per Billing Component - OREGON JURISDICTION

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5 \*\*\* RESIDENTIAL SERVICE - SCHEDULE 1 \*\*\*  
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7	8	9	(A)	(B)	(C)	(D)	(E)	(F)
FUNCTION	REVENUE	BILLING UNITS	UNIT COSTS (\$EACH)	SUMMER (\$/KWH)	NON-SUMMER (\$/KWH)	SERVICE (\$/CUST/MO)		
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\*\*\* SMALL GENERAL SERVICE - SCHEDULE 7 \*\*\*

FUNCTION	REVENUE	BILLING UNITS	UNIT COSTS (\$EACH)	SUMMER (\$/KWH)	NON-SUMMER (\$/KWH)	SERVICE (\$/CUST/MO)
GENERATION						
DEMAND - Summer	\$166,292.62	4,398,313	0.03781	0.03781		
DEMAND - Non-Summer	\$86,661.19	13,444,583	0.00645		0.00645	
ENERGY - Summer	\$110,504.34	4,398,313	0.02512	0.02512		
ENERGY - Non-Summer	\$321,568.04	13,444,583	0.02392		0.02392	
TRANSMISSION						
DEMAND	\$120,444.98	17,842,896	0.00675	0.00675		
DISTRIBUTION	\$304,285.42	17,842,896	0.01705	0.01705		
CUSTOMERS (BILLINGS)	\$482,391.94	29,705	16.23931			16.23931
TOTALS	\$1,592,148.52			0.08674	0.05417	16.23931



92 \*\*\* LARGE GENERAL SERVICE - SCHEDULE 9 TRANSMISSION \*\*\*  
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99 FUNCTION	(A) REVENUE	(B) BILLING UNITS	(C) UNIT COSTS (\$EACH)	(D) SUMMER (\$/KW)	(E) NON-SUMMER (\$/KW)	(F) SUMMER (\$/KWH)	(G) NON-SUMMER (\$/KWH)	(I) SERVICE (\$/CUST/MO)
100 GENERATION								
101 DEMAND - Summer	\$18,492.20	3,114	5.93784	5.93784				
102 DEMAND - Non-Summer	\$14,939.19	8,667	1.72362		1.72362			
103 ENERGY - Summer	\$15,438.05	640,108	0.02412			0.02412		
104 ENERGY - Non-Summer	\$47,959.26	2,192,401	0.02188				0.02188	
105 TRANSMISSION								
106 DEMAND	\$15,121.02	11,782	1.28344	1.28344	1.28344			
107 CUSTOMERS (BILLINGS)	\$1,624.39	12	135.36604					135.36604
108 TOTALS	\$113,574.11			7.22128	3.00707	0.02412	0.02188	135.36604

110 \*\*\* LARGE POWER - SCHEDULE 19 PRIMARY \*\*\*  
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119 FUNCTION	(A) REVENUE	(B) BILLING UNITS	(C) UNIT COSTS (\$EACH)	(D) SUMMER (\$/KW)	(E) NON-SUMMER (\$/KW)	(F) SUMMER (\$/KWH)	(G) NON-SUMMER (\$/KWH)	(I) SERVICE (\$/CUST/MO)	(H) BASIC (\$/KW)
120 GENERATION									
121 DEMAND - Summer	\$1,156,690.26	82,590	14.00519	14.00519					
122 DEMAND - Non-Summer	\$532,931.00	246,450	2.16243		2.16243				
123 ENERGY - Summer	\$1,043,985.71	44,170,902	0.02364			0.02364			
124 ENERGY - Non-Summer	\$3,081,546.79	135,018,145	0.02282				0.02282		
125 TRANSMISSION									
126 DEMAND	\$833,483.39	329,040	2.53308	2.53308	2.53308				3.74334
127 DISTRIBUTION	\$1,341,410.53	358,346	3.74334					245.82147	
129 CUSTOMERS (BILLINGS)	\$17,699.15	72	245.82147					245.82147	
130 TOTALS	\$8,007,746.83			16.53827	4.69551	0.02364	0.02282	245.82147	3.74334

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134 \*\*\* LARGE POWER - SCHEDULE 19 TRANSMISSION \*\*\*  
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137 FUNCTION	(A) REVENUE	(B) BILLING UNITS	(C) UNIT COSTS (\$/EACH)	(D) SUMMER (\$/KW)	(E) NON-SUMMER (\$/KW)	(F) SUMMER (\$/KWH)	(G) NON-SUMMER (\$/KWH)	(I) SERVICE (\$/CUST/MO)
139 GENERATION								
140 DEMAND - Summer	\$890,030.82	52,429	16.97579	16.97579				
141 DEMAND - Non-Summer	\$510,160.68	100,121	5.09546		5.09546			
142 ENERGY - Summer	\$652,825.24	28,508,164	0.02290			0.02290		
143 ENERGY - Non-Summer	\$1,014,951.41	45,647,703	0.02223				0.02223	
144 TRANSMISSION								
145 DEMAND	\$523,591.26	152,550	3.43226	3.43226				
146 CUSTOMERS (BILLINGS)	\$2,949.86	12	245.82147					245.82147
147 TOTALS	\$3,594,509.26			20,40805	8.52772	0.02290	0.02223	245.82147

154 \*\*\* IRRIGATION - SCHEDULE 24 SECONDARY \*\*\*  
155 (Production-related revenue and billing units are for June - September)

157 FUNCTION	(A) REVENUE	(B) BILLING UNITS	(C) UNIT COSTS (\$/EACH)	(D) IN-SEASON (\$/KW)	(E) OUT-SEASON (\$/KW)	(F) IN-SEASON (\$/KWH)	(G) OUT-SEASON (\$/KWH)	(H) SERVICE (\$/CUST/MO)
158 GENERATION								
159 DEMAND - In-Season	\$1,423,140.88	106,958	13.30555	13.30555				
160 DEMAND - Out-Season	\$341.86	33,431	0.01023		0.01023			
161 ENERGY - In-Season	\$909,502.53	39,590,985	0.02297			0.02297		
162 ENERGY - Out-Season	\$210,219.81	7,058,280	0.02978				0.02978	
163 TRANSMISSION								
164 DEMAND	\$512,286.99	140,390	3.64904	3.64904				
165 DISTRIBUTION	\$2,206,620.42	140,390	15.71783	15.71783	15.71783			
166 CUSTOMERS (BILLINGS)	\$308,928.54	18,981	16.27576					16.27576
167 TOTALS	\$5,571,041.03			32.67242	19.37710	0.02297	0.02978	16.27576

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Matthew T. Larkin  
Revenue Allocation Summary

July 29, 2011



Idaho Power Company  
Before the Oregon Public Utility Commission  
Revenue Allocation Summary  
12 Months Ending December 31, 2011  
Proformed Normalized Sales and Revenue

Line No.	Tariff Description	Rate Schedule No.	2011 Average Number of Customers	2011 Sales Normalized (kWh)	Proformed Normalized Revenue	Average Mills per kWh
1	Uniform Tariff Schedules					
1	Residential Service	1	13,578	198,842,419	\$ 15,355,932	77.23
2	Small General Service	7	2,475	17,842,896	1,559,400	87.40
3	Large General Service	9-S	892	114,256,219	6,975,915	61.06
4	Large General Service	9-P	5	15,099,088	798,102	52.86
5	Large General Service	9-T	1	2,832,509	154,997	54.72
6	Dusk/Dawn Lighting	15	-	483,936	112,462	232.39
7	Large Power Service	19-P	6	179,189,047	8,213,065	45.83
8	Large Power Service	19-T	1	74,155,867	3,123,393	42.12
9	Irrigation Service	24	1,582	46,649,265	3,454,271	74.05
10	Unmetered Service	40	3	12,900	972	75.35
11	Municipal Street Lighting	41	14	778,108	123,851	159.17
12	Traffic Control Lighting	42	6	16,328	1,231	75.39
13	Total Oregon Rates		18,563	650,158,582	39,873,591	61.33

Idaho Power Company  
Before the Oregon Public Utility Commission  
Revenue Allocation Summary  
12 Months Ending December 31, 2011  
Marginal Cost - Revenue Allocation Results

Line No.	Tariff Description	Rate Schedule No.	COS Percent Change	COS Revenue Change	Revenue Allocation at COS	Average Mills per kWh
	<u>Uniform Tariff Schedules</u>					
1	Residential Service	1	18.75%	\$ 2,879,109	\$ 18,235,041	91.71
2	Small General Service	7	2.10%	\$ 32,749	\$ 1,592,149	89.23
3	Large General Service	9-S	8.31%	\$ 579,470	\$ 7,555,385	66.13
4	Large General Service	9-P	2.59%	\$ 20,639	\$ 818,741	54.22
5	Large General Service	9-T	-26.72%	\$ (41,423)	\$ 113,574	40.10
6	Dusk/Dawn Lighting	15	-6.53%	\$ (7,344)	\$ 105,118	217.21
7	Large Power Service	19-P	-2.50%	\$ (205,318)	\$ 8,007,747	44.69
8	Large Power Service	19-T	15.08%	\$ 471,116	\$ 3,594,509	48.47
9	Irrigation Service	24	61.28%	\$ 2,116,770	\$ 5,571,041	119.42
10	Unmetered Service	40	13.57%	\$ 132	\$ 1,104	85.58
11	Municipal Street Lighting	41	1.01%	\$ 1,245	\$ 125,096	160.77
12	Traffic Control Lighting	42	<u>55.42%</u>	<u>\$ 682</u>	<u>\$ 1,913</u>	<u>117.17</u>
13	<i>Total Oregon Rates</i>		14.67%	\$ 5,847,826	\$ 45,721,417	70.32

Idaho Power Company  
Before the Oregon Public Utility Commission  
Revenue Allocation Summary  
12 Months Ending December 31, 2011  
First Pass Revenue Allocation

Line No.	<u>Tariff Description</u>	Rate Schedule No.	First Pass Percent Change	First Pass Revenue Change	First Pass Revenue Allocation
	<u>Uniform Tariff Schedules</u>				
1	Residential Service	1	18.75%	\$ 2,879,109	\$ 18,235,041
2	Small General Service	7	2.10%	32,749	1,592,149
3	Large General Service	9-S	8.31%	579,470	7,555,385
4	Large General Service	9-P	2.59%	20,639	818,741
5	Large General Service	9-T	0.00%	0	154,997
6	Dusk/Dawn Lighting	15	0.00%	0	112,462
7	Large Power Service	19-P	0.00%	0	8,213,065
8	Large Power Service	19-T	15.08%	471,116	3,594,509
9	Irrigation Service	24	29.34%	1,013,483	4,467,754
10	Unmetered Service	40	13.57%	132	1,104
11	Municipal Street Lighting	41	1.01%	1,245	125,096
12	Traffic Control Lighting	42	<u>29.34%</u>	<u>361</u>	<u>1,592</u>
13	<i>Total Oregon Rates</i>		11.14%	4,998,303	44,871,894
14					
15					
16	Revenue Requirement Shortfall			\$	\$ 849,523

Idaho Power Company  
Before the Oregon Public Utility Commission  
Revenue Allocation Summary  
12 Months Ending December 31, 2011  
Final Revenue Allocation

Line No.	Tariff Description	Rate Schedule No.	Final Percent Change	Final Revenue Change	Final Revenue Allocation	Average Mills per kWh	Cost of Service Index
	<u>Uniform Tariff Schedules</u>						
1	Residential Service	1	21.91%	\$ 3,364,387.39	\$ 18,720,319	94.15	103%
2	Small General Service	7	4.82%	\$ 75,119.47	\$ 1,634,519	91.61	103%
3	Large General Service	9-S	11.19%	\$ 780,536.70	\$ 7,756,452	67.89	103%
4	Large General Service	9-P	5.32%	\$ 42,427.86	\$ 840,530	55.67	103%
5	Large General Service	9-T	0.00%	\$ -	\$ 154,997	54.72	136%
6	Dusk/Dawn Lighting	15	0.00%	\$ -	\$ 112,462	232.39	107%
7	Large Power Service	19-P	0.00%	\$ -	\$ 8,213,065	45.83	103%
8	Large Power Service	19-T	18.15%	\$ 566,774.90	\$ 3,690,168	49.76	103%
9	Irrigation Service	24	29.34%	\$ 1,013,483.11	\$ 4,467,754	95.77	80%
10	Unmetered Service	40	16.60%	\$ 161.31	\$ 1,133	87.85	103%
11	Municipal Street Lighting	41	3.69%	\$ 4,574.22	\$ 128,425	165.05	103%
12	Traffic Control Lighting	42	<u>29.34%</u>	<u>\$ 361.18</u>	<u>\$ 1,592</u>	<u>97.51</u>	<u>83%</u>
13	<i>Total Oregon Rates</i>		14.67%	5,847,826	45,721,417	70.32	100%

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**  
**DIRECT TESTIMONY**  
**OF**  
**DARLENE NEMNICH**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Darlene Nemnich. My business address is 1221 West Idaho Street,  
3 Boise, Idaho 83702.

4 **Q. By whom are you employed and in what capacity?**

5 A. I am employed by Idaho Power Company ("Idaho Power" or "Company") as a Senior  
6 Regulatory Analyst.

7 **Q. Please describe your educational background.**

8 A. In May of 1979, I received a Bachelor of Arts degree in Business Administration with  
9 emphases in Finance and Economics from the College of Idaho. In addition, I have  
10 attended the electric utility ratemaking course offered through New Mexico State  
11 University's Center for Public Utilities as well as various other ratemaking courses  
12 sponsored by the Edison Electric Institute. I am also an active member of the Edison  
13 Electrical Institute's Rate and Regulatory Analysts Group.

14 **Q. Please describe your work experience with Idaho Power.**

15 A. In 1982, I was hired as an analyst in the Resource Planning Department. My primary  
16 duties were the calculation of avoided costs for cogeneration and small power  
17 production contracts and the calculation of costs of future generation resource  
18 options. In 1989, I moved to the Energy Services Department where I performed  
19 economic, financial, and statistical analyses to determine the cost-effectiveness of  
20 demand-side management programs. I stayed in that general area designing,  
21 implementing, and evaluating programs until 2000, when I was promoted to Energy  
22 Efficiency Coordinator. In that capacity, I coordinated the Company's effort to grow  
23 customer programs and education in energy efficiency promotion. I was responsible  
24 for ensuring Company compliance with regulatory and financial requirements in the  
25 area of energy efficiency. In 2003, I was promoted to Energy Efficiency Leader  
26 where I managed the Company's demand-side management effort, including

1 strategic planning, design and development of programs, regulatory compliance, and  
2 overall management of the department. In 2006, I left the Company to pursue  
3 personal opportunities. In April 2008, I returned to the Company as a Senior  
4 Regulatory Analyst in the Regulatory Affairs Department. My duties as Senior  
5 Regulatory Analyst include the development of alternative pricing structures, analysis  
6 of the impact on customers of rate design changes, and the administration of the  
7 Company's tariffs. I have testified before the Commission and the Idaho Public  
8 Utility Commission several times.

9 **Q. What is the purpose of your testimony in this matter?**

10 A. My testimony will address the Company's rate design proposal for the residential  
11 customer class.

12 **Q. Are you sponsoring any exhibits?**

13 A. Yes. I am sponsoring the following exhibits relating to residential rate design:

- 14 • Exhibit 1101 - Calculation of Revenue Impact
- 15 • Exhibit 1102 - Typical Monthly Billing Comparison

16 **I. RESIDENTIAL RATE DESIGN OBJECTIVES**

17 **Q. What are the Company's overall objectives with regard to its rate design  
18 strategy?**

19 A. The Company's rate design is developed to recover the revenue requirement targets  
20 provided by Mr. Matthew T. Larkin for each customer class. In doing so, the  
21 Company continues to maintain two important objectives with regard to rate design:  
22 (1) to establish prices that primarily reflect the costs of the services provided; and (2)  
23 to present cost-based rate proposals designed to align with and encourage energy  
24 efficiency.

25 **Q. Does the Company's proposed residential rate design establish prices that  
26 primarily reflect the costs of services provided?**

1 A. Yes. This proposal establishes rates that recover the target revenue described by  
2 Mr. Larkin, and also implements the Company's rate design objectives by pricing the  
3 individual rate components closer to the unit costs of providing electric service. To  
4 further address the Company's rate design objectives, I am also proposing the  
5 implementation of a two-tiered inverted block seasonal rate design with modified  
6 energy rate block levels.

7 **Q. Does your proposal encourage increased energy efficiency?**

8 A. Yes. My proposal supports the continuation of tiered rates and the implementation of  
9 seasonal rates, both of which encourage customers to use energy more efficiently in  
10 response to the appropriate price signals.

11 **Q. Please describe the methodology used to move current rate levels closer to  
12 cost-of-service levels for Schedule 1.**

13 A. The methodology used to calculate the proposed rate component adjustments for  
14 Schedule 1 represents a uniform percentage movement of 5 percent toward the unit  
15 cost-of-service intended for recovery by that rate component. In applying this  
16 methodology, the Company first considered the percentage of overall revenue that  
17 would be recovered under each Schedule 1 billing component if each billing  
18 component was set at the full unit cost-of-service. These percentages established  
19 the target revenue for each billing component. Second, the Company determined  
20 the percentage of overall revenue currently recovered by each billing component at  
21 existing base rates. The difference, or gap, between the targeted level and the  
22 actual percentage was then determined for each billing component. The current  
23 percentage of overall revenue by billing component was then adjusted by  
24 approximately 5 percent of the gap to establish adjusted revenue targets.

25 **Q. Did the Company consider increasing all Schedule 1 rate components on a  
26 uniform percentage basis?**



1 A. No. If all billing components were increased by the same uniform percentage without  
2 consideration of the cost-of-service unit costs, then some billing units would move  
3 further away from their actual unit cost-of-service, contrary to the Company's  
4 objective of moving toward cost-based rate designs. Moving all billing components 5  
5 percent closer to their respective cost-of-service unit cost provides a reasonable,  
6 quantifiable goal while meeting the Company's first rate design objective of  
7 establishing prices that primarily reflect the costs of the services provided.

8 **Q. Is the methodology described above the only way you have modified rate**  
9 **levels to accomplish the Company's stated goals?**

10 A. No. To provide better pricing signals in the movement towards the cost-of-service  
11 goal, Idaho Power is also proposing to raise the tier block cut-off levels and to  
12 implement seasonal rates. These proposals are described in greater detail later in  
13 my testimony.

14 **II. RESIDENTIAL RATE DEVELOPMENT**

15 **Q. What is the annual revenue requirement to be recovered from Residential**  
16 **Service customers taking service under Schedule 1?**

17 A. The annual revenue to be recovered from Residential Service customers taking  
18 service under Schedule 1 is \$18,720,319, as shown in Mr. Larkin's Exhibit 1007,  
19 page 4. This number represents an overall increase for the residential class of 21.91  
20 percent.

21 **Q. Please describe the present rate structure for Residential Service under**  
22 **Schedule 1.**

23 A. Residential Service customers currently taking service under Schedule 1 pay a  
24 monthly Service Charge of \$8.00. Their Energy Charge is based upon a two-tier  
25 inverted block structure in which they pay a base rate of 6.0253 cents per kilowatt-  
26

1 hour (“kWh”) for the first 300 kWh of energy used (the first block) and 7.3884 cents  
2 per kWh for all energy used over 300 kWh (the second block).

3 **Q. Please describe the Company’s proposal to increase the Service Charge.**

4 A. The Service Charge is intended to recover costs that do not vary with the amount of  
5 energy or capacity used. This includes the investments in the service line and meter  
6 as well as billing costs. Historically, the Service Charge has been well below the  
7 cost-of-service unit cost, meaning that the Service Charge, from a cost-of-service  
8 standpoint, has under-collected the customer-related fixed costs associated with this  
9 rate component. Consistent with the Company’s rate design objective to move the  
10 individual rate components closer to the cost-of-service unit costs, the Company is  
11 proposing to increase the Service Charge to \$10.00 per customer per month.

12 **Q. How does the proposed \$10.00 Service Charge compare with the cost-of-  
13 service results?**

14 A. The \$10.00 per month Service Charge represents approximately 66 percent of the  
15 cost-of-service unit cost result of \$15.19 shown at line 24 on page 2 of Mr. Larkin’s  
16 Exhibit 1006. The calculation of moving the Service Charge level 5 percent closer to  
17 cost-of-service levels resulted in a \$10.03 amount. The Company rounded this value  
18 to \$10.00.

19 **Q. Are there other reasons to increase the Service Charge?**

20 A. Yes. In addition to meeting the Company’s objective of moving rate components  
21 closer to the cost-of-service, increasing the Service Charge also helps remove the  
22 inherent financial disincentive for an electric utility to invest in energy efficiency  
23 programs by reducing the amount of fixed costs that would be recovered through the  
24 volumetric energy charge.

25 **Q. Please describe your proposal to modify the Energy Charge block levels.**

26

1 A. Currently, customers taking service under Schedule 1 pay one rate for the first 300  
2 kWh of energy used and a slightly higher rate for all energy used over 300 kWh year-  
3 round. The Company is proposing to raise the cut-off for the first block of energy  
4 usage to 1,000 kWh.

5 **Q. Why are you proposing to raise the size of the first block of energy use?**

6 A. Inverted block rates are a mechanism for providing an incentive to customers to  
7 conserve energy by charging customers a higher rate for energy as the amount of  
8 energy usage increases. One of the Company's goals for the first energy block is to  
9 set it at a level that will cover a majority of customers' basic electric usage, or the  
10 usage that customers may not be able to reduce, for example usage from lighting  
11 and home appliances. Usage that falls in the second block, which is priced at a  
12 higher rate, is more likely discretionary usage. The Company has found that basic  
13 electric usage generally consists of more than 300 kWh per month, the current level  
14 of the first block.

15 **Q. How did you determine that 1,000 kWh per month is the appropriate amount for  
16 the first block of energy usage?**

17 A. Idaho Power conducted a bill frequency analysis of all residential usage in 2010.  
18 This analysis showed that on an annual basis, approximately 52.4 percent of all bills  
19 were for 1,000 kWh or less, representing approximately 64 percent of all kWh usage  
20 for the year. Idaho Power proposes a first-tier cut-off level of 1,000 kWh in order to  
21 provide a price signal to conserve to the highest 36 percent of usage.

22 In addition, Idaho Power examined customers' loads during the spring and  
23 fall months, a time when it is reasonable to assume that neither an air conditioner nor  
24 a heater would be running or, if running, would have minimal usage. This would  
25 likely occur in May and October. The 2010 average usage for May and October was  
26 923 kWh and 821 kWh, respectively. This baseline load estimate would probably

1 include a customer's lighting, basic home appliances (a refrigerator, range, oven,  
2 microwave, and water heater) as well as other household appliances, such as  
3 clocks, stereos/radios, telephones, vacuum cleaners, televisions, and clothes  
4 washers and dryers. Idaho Power's proposed block level of 1,000 kWh would  
5 provide the lower, first block rates for all typical baseline usage.

6 Also, Idaho Power examined the average monthly residential customer  
7 energy usage. In the Company's Oregon jurisdiction, the 5-year average normalized  
8 energy usage through 2010 is 1,233 kWh per month. In an effort to incent customers  
9 to conserve year-round, the Company is proposing to set the first block at  
10 approximately 80 percent of the average monthly energy usage for the Company's  
11 customers in Oregon, or 1,000 kWh. Furthermore, adjusting the first consumption  
12 tier to 1,000 kWh will allow a large percentage of what might be considered basic  
13 electric usage to be priced at the lower rate.

14 **Q. How does your proposal of the first block cut-off at 1,000 kWh compare with**  
15 **the first block cut-off of other utilities' residential rates in Oregon?**

16 A. Both Portland General Electric and Pacific Power have two-tiered inverted block  
17 rates for their residential customers in Oregon. And for both utilities, the cut-off for  
18 the first-tier is 1,000 kWh.

19 **Q. Why is the Company proposing to add a seasonal component to the existing**  
20 **two-tier rate structure?**

21 A. Idaho Power continues to be a summer peaking utility with its highest system peak  
22 occurring during the summer months. The unit costs resulting from the Company's  
23 proposed cost-of-service study indicate that the residential kilowatt-hour unit cost is  
24 approximately 61 percent higher in the summer than for the non-summer months. In  
25 fact, the unit cost differential for the generation function alone, as provided by the  
26 marginal cost allocation methodology described by Mr. Larkin, results in a summer

1 differential of more than 127 percent over the non-summer months. The current  
2 residential rate design, which does not include a seasonal component, does not  
3 provide customers with any indication that the costs incurred by the Company to  
4 provide them energy service during the three summer months are significantly  
5 greater than the nine non-summer months. In addition, the Company's Oregon  
6 residential rate design is the only rate design in all of the Company's other major rate  
7 designs in both Idaho and Oregon that does not have a seasonal pricing component.  
8 All of the other rate designs provide customers with a seasonal pricing signal. It is  
9 appropriate to send a higher price signal to encourage customers to use energy  
10 more efficiently during the summer peak months.

11 **Q. How are the seasons defined for the Company's residential pricing proposal?**

12 A. For the Energy Charge rate components, the Company is proposing seasonal rates  
13 for two seasons, summer and non-summer. The summer season is defined as June  
14 1 through August 31. The non-summer season is defined as September 1 through  
15 May 31. The proposed seasonal definition for the residential class is the same as  
16 that currently in place for Schedule 7, Schedule 9, and Schedule 19 customers within  
17 Oregon as well as what is in place for Schedule 1, Schedule 7, Schedule 9, and  
18 Schedule 19 customers throughout the Company's Idaho service territory.

19 **Q. Please describe the Company's proposal for applying seasonal rates to the  
20 Energy Charge.**

21 A. For the summer months, the rate proposed for the first block Energy Charge is  
22 8.2222 cents per kWh and 10.0310 cents per kWh for the second block Energy  
23 Charge. During the non-summer months, the proposed rates for the first and second  
24 Energy Charge blocks are 8.2222 cents per kWh and 9.1266 cents per kWh,  
25 respectively. This results in a first block Energy Charge rate of 8.2222 cents per  
26 kWh for all months of the year. There will be a difference in the rates only in the

1 second block from summer season to non-summer season. Customers whose  
2 usage falls within that first block every month will not see a seasonal difference in  
3 rates; rather, they will pay the same Energy Charge rate year-round. Only those  
4 customers who use more than 1,000 kWh per month and whose usage moves into  
5 the second tier will receive a seasonal price signal. This proposed rate design is  
6 shown on page 1 of Exhibit 1101.

7 When an average seasonal rate is calculated with these proposed rates, and  
8 compared to each other, a seasonal differential of approximately 1.5 percent results.  
9 This moderate seasonal differential sends an introductory price signal to customers  
10 as a step towards seasonal rates.

11 **Q. Why is the Company proposing first block Energy Charge rates at the same**  
12 **level for both seasons?**

13 A. As indicated earlier in this testimony, electric usage that falls in the first block is less  
14 likely to be discretionary usage where customers may have less ability to respond to  
15 price signals. Setting the first block Energy Charges the same year-round  
16 recognizes this limitation. Currently, customers experience the same Energy Charge  
17 rate year-round for the first 300 kWh of usage. With Idaho Power's proposal,  
18 customers will experience the same Energy Charge rate year-round for the first  
19 1,000 kWh of usage.

20 **Q. What are the differentials between the first and second block in the summer**  
21 **season as compared to the non-summer season?**

22 A. For the summer season rates, Idaho Power's proposes no change to the differential  
23 between first block and second block – it remains at the current differential of  
24 approximately 22 percent. For the non-summer season, Idaho Power proposes a  
25 smaller differential of only 11 percent.

26

1 **Q. Why would the block differential in the summer be larger than the block**  
2 **differential for the non-summer rates?**

3 A. As shown in Mr. Larkin's Exhibit 1006 on page 2, and discussed on page 7 above,  
4 the summer season cost-of-service unit costs for energy are much higher than the  
5 non-summer season cost-of-service unit costs for energy. Setting the differential  
6 higher in the summer than winter is the mechanism to send this cost-based price  
7 signal to customers.

8 **III. RESIDENTIAL RATE PROPOSAL SUMMARY**

9 **Q. Please summarize the Company's rate design proposal for Schedule 1.**

10 A. The Company proposes that the Service Charge be set at \$10.00 per month. During  
11 the summer season, the Company proposes customers pay a base Energy Charge  
12 of 8.2222 cents per kWh for the first 1,000 kWh of energy used and 10.0310 cents  
13 per kWh for all additional kWh over 1,000 each month. During the non-summer  
14 season, the Company proposes customers pay an Energy Charge of 8.2222 cents  
15 per kWh for the first 1,000 kWh of energy used and 9.1266 cents per kWh for all  
16 additional kWh over 1,000 each month.

17 The Company's proposed rate design for Schedule 1, Residential Service, is  
18 shown on page 1 of Exhibit 1101.

19 **Q. What impact will this rate design proposal have on Residential Service**  
20 **customers taking service under Schedule 1?**

21 A. The typical monthly billing comparison for Residential Service customers taking  
22 service under Schedule 1 appears on page one of Exhibit 1102. This comparison  
23 shows that given the typical monthly usage blocks shown in Exhibit 1102, the range  
24 of increase is from 32.94 percent for customers using 300 kWhs in a month to 18.91  
25 percent for customers using 1,000 kWh in a month. The higher increase at the lower  
26 use levels is largely caused by the impact of the increased Service Charge. The

1 monthly usage based upon more average residential usage levels (800 kWh per  
2 month though 1,300 kWh per month) exhibits the lowest increase. This is the result  
3 of the majority of the energy usage being charged at the lower, first block rate.  
4 Finally, the higher monthly usage amounts, starting at 2,000 kWhs per month and  
5 higher, see a higher percentage overall annual increase due to the impact of the  
6 higher rates of the second block.

7 This rate design continues to provide an incentive for customers to use their  
8 electric energy more efficiently. Further, the proposed rate structure sends a more  
9 accurate price signal to customers as compared to current rate structure by more  
10 closely aligning prices with costs.

11 **Q. Are you proposing any other changes to Schedule 1?**

12 A. No.

13 **Q. Does this conclude your testimony?**

14 A. Yes.

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Idaho Power/1101  
Witness: Darlene Nemnich

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Darlene Nemnich  
Calculation of Revenue Impact

July 29, 2011

Idaho Power Company  
Calculation of Revenue Impact  
State of Oregon  
2011 General Rate Case Filing  
Filed July 29, 2011

Residential Service  
Schedule 1

Line No.	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	162,935	8.00	\$1,303,478	10.00	\$1,629,347	\$325,869	25.00%
2	Minimum Charge	718	3.00	\$2,155	3.00	\$2,155	\$0	0.00%
3	<u>Current Energy Charge</u>							
4	0-300 kWh	47,023,144	0.060253	\$2,833,285				
5	Over 300 kWh	151,819,275	0.073884	\$11,217,015				
6	Total Energy	198,842,419		\$14,050,300				
7	<u>Proposed Energy Charge</u>							
8	<u>Summer</u>							
9	0-1000 kWh	30,880,485		\$2,120,633	0.082222	\$2,539,055	\$418,422	19.73%
10	Over 1000 kWh	10,872,779		\$803,324	0.100310	\$1,090,648	\$287,324	35.77%
11	Summer Energy	41,753,264		\$2,923,958		\$3,629,703	\$705,745	24.14%
12	<u>Non-Summer</u>							
13	0-1000 kWh	97,057,335		\$6,690,952	0.082222	\$7,980,248	\$1,289,296	19.27%
14	Over 1000 kWh	60,031,820		\$4,435,391	0.091266	\$5,478,864	\$1,043,473	23.53%
15	Non-Summer Energy	157,089,155		\$11,126,343		\$13,459,112	\$2,332,769	20.97%
16	Total Energy	198,842,419		\$14,050,300		\$17,088,815	\$3,038,515	21.63%
7	Total Revenue			\$15,355,933		\$18,720,317	\$3,364,384	21.91%
8	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
9	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
10	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
11	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
12	Total Billed Revenue			\$15,355,933		\$18,720,317	\$3,364,384	21.91%

Idaho Power/1102  
Witness: Darlene Nemnich

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Darlene Nemnich  
Typical Monthly Billing Comparison

July 29, 2011

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Residential Service  
Schedule 1

Line No	Energy kWh	(1)		(2)		(3)		(4)		(5)		(6)		(7)		(8)		(9)	
		Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference
1	0	8.00	10.00	25.00%	8.00	10.00	25.00%	8.00	10.00	25.00%	8.00	10.00	25.00%	8.00	10.00	25.00%	8.00	10.00	25.00%
2	100	14.03	18.22	29.86%	14.03	18.22	29.86%	14.03	18.22	29.86%	14.03	18.22	29.86%	14.03	18.22	29.86%	14.03	18.22	29.86%
3	200	20.05	26.44	31.87%	20.05	26.44	31.87%	20.05	26.44	31.87%	20.05	26.44	31.87%	20.05	26.44	31.87%	20.05	26.44	31.87%
4	300	26.08	34.67	32.94%	26.08	34.67	32.94%	26.08	34.67	32.94%	26.08	34.67	32.94%	26.08	34.67	32.94%	26.08	34.67	32.94%
5	400	33.47	42.89	28.14%	33.47	42.89	28.14%	33.47	42.89	28.14%	33.47	42.89	28.14%	33.47	42.89	28.14%	33.47	42.89	28.14%
6	500	40.86	51.11	25.09%	40.86	51.11	25.09%	40.86	51.11	25.09%	40.86	51.11	25.09%	40.86	51.11	25.09%	40.86	51.11	25.09%
7	600	48.25	59.33	22.96%	48.25	59.33	22.96%	48.25	59.33	22.96%	48.25	59.33	22.96%	48.25	59.33	22.96%	48.25	59.33	22.96%
8	700	55.63	67.56	21.45%	55.63	67.56	21.45%	55.63	67.56	21.45%	55.63	67.56	21.45%	55.63	67.56	21.45%	55.63	67.56	21.45%
9	800	63.02	75.78	20.25%	63.02	75.78	20.25%	63.02	75.78	20.25%	63.02	75.78	20.25%	63.02	75.78	20.25%	63.02	75.78	20.25%
10	900	70.41	84.00	19.30%	70.41	84.00	19.30%	70.41	84.00	19.30%	70.41	84.00	19.30%	70.41	84.00	19.30%	70.41	84.00	19.30%
11	1,000	77.80	92.22	18.53%	77.80	92.22	18.53%	77.80	92.22	18.53%	77.80	92.22	18.53%	77.80	92.22	18.53%	77.80	92.22	18.53%
12	1,050	81.49	97.24	19.33%	81.49	96.78	18.76%	81.49	96.78	18.76%	81.49	96.78	18.76%	81.49	96.90	18.91%	81.49	96.90	18.91%
13	1,100	85.19	102.25	20.03%	85.19	101.35	18.97%	85.19	101.35	18.97%	85.19	101.35	18.97%	85.19	101.58	19.24%	85.19	101.58	19.24%
14	1,200	92.58	112.28	21.28%	92.58	110.47	19.32%	92.58	110.47	19.32%	92.58	110.47	19.32%	92.58	110.92	19.81%	92.58	110.92	19.81%
15	1,300	99.96	122.31	22.36%	99.96	119.60	19.65%	99.96	119.60	19.65%	99.96	119.60	19.65%	99.96	120.28	20.33%	99.96	120.28	20.33%
16	1,400	107.35	132.34	23.28%	107.35	128.73	19.92%	107.35	128.73	19.92%	107.35	128.73	19.92%	107.35	129.63	20.75%	107.35	129.63	20.75%
17	1,500	114.74	142.38	24.09%	114.74	137.85	20.14%	114.74	137.85	20.14%	114.74	137.85	20.14%	114.74	138.98	21.13%	114.74	138.98	21.13%
18	2,000	151.68	192.53	26.93%	151.68	183.49	20.97%	151.68	183.49	20.97%	151.68	183.49	20.97%	151.68	185.75	22.46%	151.68	185.75	22.46%
19	2,500	188.62	242.69	28.67%	188.62	229.12	21.47%	188.62	229.12	21.47%	188.62	229.12	21.47%	188.62	232.51	23.27%	188.62	232.51	23.27%
20	3,000	225.57	292.84	29.82%	225.57	274.75	21.80%	225.57	274.75	21.80%	225.57	274.75	21.80%	225.57	279.27	23.81%	225.57	279.27	23.81%
21	4,000	299.45	393.15	31.29%	299.45	366.02	22.23%	299.45	366.02	22.23%	299.45	366.02	22.23%	299.45	372.80	24.49%	299.45	372.80	24.49%
22	5,000	373.33	493.46	32.18%	373.33	457.28	22.49%	373.33	457.28	22.49%	373.33	457.28	22.49%	373.33	466.33	24.91%	373.33	466.33	24.91%

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

**DOCKET NO. UE \_\_\_\_\_**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR )  
AUTHORITY TO INCREASE ITS RATES )  
AND CHARGES FOR ELECTRIC )  
SERVICE TO ITS CUSTOMERS IN THE )  
STATE OF OREGON. )  
\_\_\_\_\_ )

**IDAHO POWER COMPANY**

**DIRECT TESTIMONY**

**OF**

**SCOTT D. SPARKS**

**July 29, 2011**

1 **Q. Please state your name and business address.**

2 A. My name is Scott Sparks. I am employed by Idaho Power Company ("Idaho Power"  
3 or "Company") as a Senior Regulatory Analyst in the Regulatory Affairs Department.  
4 My business address is 1221 West Idaho Street, Boise, Idaho 83702.

5 **Q. Please describe your educational background.**

6 A. In May of 1989, I received a Bachelor of Business Administration degree in Business  
7 Management from Boise State University. I have also completed post-graduate  
8 econometrics courses and attended the electric utility ratemaking course offered  
9 through New Mexico State University's Center for Public Utilities, as well as various  
10 advanced ratemaking courses presented by the Edison Electric Institute.

11 **Q. Please describe your work experience.**

12 A. I became employed by Idaho Power Company in 1985 as a part-time mail clerk and  
13 have held positions as Meter Reader, Customer Service Representative, Economic  
14 Analyst, Human Resource/Compensation Analyst, Regulatory Analyst, and Resource  
15 Planning Analyst.

16 In January of 1991, after two years in the Customer Service Department, I  
17 was offered and I accepted a position in the Company's Energy Services  
18 Department. My responsibilities over six years in the department varied from  
19 conservation program evaluation, special studies, load forecasting, and research. In  
20 1995, I was asked to temporarily transfer to the Human Resources Department to  
21 assist with implementation of the Company's reorganization, benefit, and  
22 compensation plans.

23 In 1998, I applied for and accepted a position in the Regulatory Affairs  
24 Department where I was responsible for reviving the Company's resource planning  
25 and integrated resource planning processes. As part of reorganization, I was  
26 reassigned to the Power Supply Planning Department in 2001 where I acted as the

1 lead analyst for the Integrated Resource Plan. In July 2003, I left the Company to  
2 pursue self-employment in the real estate and construction sectors. I returned to the  
3 Company as a Senior Regulatory Analyst in the Regulatory Affairs Department in  
4 June 2008.

5 **Q. What is the purpose of your testimony?**

6 A. My testimony addresses proposed changes to the Company's commercial, industrial,  
7 irrigation, lighting, and non-metered retail tariff schedules. I will also address  
8 proposed updates to the rates charged under the Company's facilities charge  
9 provisions.

10 **Q. What are the Company's overall objectives with regard to its rate design  
11 strategy?**

12 A. The Company's rate designs are developed to recover the revenue requirement  
13 targets provided by Mr. Matthew T. Larkin for each customer class and special  
14 contract customer. In doing so, the Company continues to maintain two important  
15 objectives with regard to rate design: (1) to establish prices that primarily reflect the  
16 costs of the services provided, and (2) to have cost-based rate proposals designed  
17 to align with and encourage energy efficiency.

18 **I. COMMERCIAL AND INDUSTRIAL**

19 **Q. How is the discussion of your rate design proposals organized within your  
20 testimony for the commercial and industrial customer classes?**

21 A. My testimony for the commercial and industrial customer classes will address rate  
22 design proposals for Schedules 7, 9, and 19, respectively.

23 **Q. Please describe the methodology used to determine the rate component  
24 adjustments for Schedules 7, 9, and 19.**

25 A. As part of the Company's more recent general rate cases, the Company has moved  
26 toward its objective of establishing prices that primarily reflect the costs of the

1 services provided for the demand-metered schedules by emphasizing increases in  
2 the demand- and customer-related components and the inclusion of fewer non-  
3 energy-related costs in the energy charges. The Company's proposed methodology  
4 used to determine the rate component adjustments for Schedules 7, 9, and 19 in this  
5 case furthers that objective.

6 The methodology used to calculate the proposed rate component  
7 adjustments for Schedules 7, 9, and 19 represents a uniform percentage movement  
8 of 5 percent toward the unit cost-of-service intended for recovery by that rate  
9 component. In applying this methodology, the Company first considered the  
10 percentage of overall revenue that would be recovered under each billing component  
11 if each billing component was set at the full unit cost-of-service. These percentages  
12 established the target revenue for each billing component. Second, the Company  
13 determined the percentage of overall revenue currently recovered by each billing  
14 component at existing base rates. The difference, or gap, between the targeted level  
15 and the actual percentage was then determined for each billing component. The  
16 current percentage of overall revenue by billing component was then adjusted by  
17 approximately 5 percent of the gap to establish adjusted revenue targets.

18 **A. Small General Service, Schedule 7.**

19 **Q. What is the present rate structure for Schedule 7?**

20 A. Customers taking service under Schedule 7 pay separate monthly Service Charges  
21 for single-phase and three-phase services, a monthly seasonal Energy Charge for  
22 the first 500 kilowatt-hours ("kWh") used, and a separate seasonal Energy Charge  
23 for all usage over 500 kWh in a month. Summer Energy Charges begin on June 1 of  
24 each year and end on August 31 of each year while the non-summer Energy  
25 Charges begin on September 1 of each year and end on May 31 of each year.  
26 Schedule 7 customers do not have a Demand Charge.



1 **Q. What is the revenue requirement to be recovered from customers taking**  
2 **service under Schedule 7?**

3 A. The annual revenue requirement for Schedule 7 customers is \$1,634,519. This is  
4 shown on page 4 of Mr. Larkin's Exhibit 1007.

5 **Q. Please describe the proposed rate design adjustments for Schedule 7.**

6 A. For all energy components, the Company is proposing rates that represent a uniform  
7 5 percent movement towards the costs to serve that rate component. All rate design  
8 adjustments for Schedule 7 are included on page 1 of Exhibit 1201 and target the  
9 proposed class revenue increase of 4.82 percent shown on page 4 of Mr. Larkin's  
10 Exhibit 1007.

11 **Q. Have you prepared an exhibit that illustrates the impact of the proposed rate**  
12 **adjustments on Small General Service customers?**

13 A. Yes. Page 1 of Exhibit 1202 shows the billing comparison between Schedule 7  
14 existing rates and proposed rates for typical billing levels.

15 **B. Large General Service, Schedule 9.**

16 **Q. In general terms, what is the current rate structure for Schedule 9?**

17 A. Service under Schedule 9 may be taken at a Secondary, Primary, or Transmission  
18 Service level. All customers taking service under Schedule 9 pay a Service Charge,  
19 a Basic Charge, and both summer and non-summer Energy and Demand Charges.  
20 Customers taking Primary or Transmission service may also pay a facilities charge  
21 for Company-owned facilities installed beyond Idaho Power's Point of Delivery.

22 **1. Large General Service, Schedule 9 – Secondary.**

23 **Q. What is the current rate structure for Schedule 9 Secondary Service?**

24 A. The current rate structure for Schedule 9 Secondary Service includes separate  
25 monthly Service Charges for single-phase and three-phase services, a Basic  
26 Charge, and seasonal Demand and Energy Charges.

1 **Q. What is the revenue requirement for customers taking Secondary Service**  
2 **under Schedule 9?**

3 A. The annual revenue requirement for customers taking Secondary Service under  
4 Schedule 9, as shown on page 4 of Mr. Larkin's Exhibit 1007, is \$7,756,452.

5 **Q. Have you prepared an exhibit that illustrates the rate design proposal for**  
6 **revenue recovery under Schedule 9 Secondary Service?**

7 A. Yes, the rate design proposal for Schedule 9 Secondary Service is included on page  
8 2 of Exhibit 1201 and targets the proposed class revenue increase of 11.19 percent  
9 shown on page 4 of Mr. Larkin's Exhibit 1007. As previously described, for all rate  
10 components, the Company is proposing rates that represent a uniform 5 percent  
11 movement towards the costs to serve that rate component. The costs to serve each  
12 rate component are detailed on page 3 of Mr. Larkin's Exhibit 1006.

13 **Q. Have you prepared an exhibit that shows the impact of the rate design on**  
14 **Schedule 9 Secondary Service level customers?**

15 A. Yes. Pages 2-4 of Exhibit 1202 show the billing comparison between the Schedule 9  
16 Secondary Service level existing rates and proposed rates for typical billing levels.  
17 As can be seen from this exhibit, for each Demand level, higher load factor  
18 customers will see a lower overall increase as compared to low load factor  
19 customers.

20 **2. Large General Service, Schedule 9 - Primary and Transmission.**

21 **Q. What is the current rate structure for Schedule 9 Primary and Transmission**  
22 **Service?**

23 A. All customers taking service under Schedule 9 Primary or Transmission Service pay  
24 a Service Charge, a Basic Charge, a summer On-Peak Demand Charge, and  
25 seasonal time-of-use Demand and Energy Charges. Customers may also pay a  
26

1 facilities charge for Company-owned facilities installed beyond Idaho Power's Point  
2 of Delivery.

3 **Q. What is the revenue requirement to be recovered from Schedule 9 customers**  
4 **taking Primary Service?**

5 A. The annual revenue requirement for Schedule 9 Primary Service customers, as  
6 shown on page 4 of Mr. Larkin's Exhibit 1007, is \$840,530.

7 **Q. Have you prepared an exhibit that illustrates the rate design proposal for**  
8 **revenue recovery of Primary Service under Schedule 9?**

9 A. Yes, the rate design proposal for Schedule 9 Primary Service is included on pages 3  
10 of Exhibit 1201 and targets the proposed class revenue increase of 5.32 percent  
11 shown on page 4 of Mr. Larkin's Exhibit 1007. For all rate components, the  
12 Company is proposing rates that represent a uniform 5 percent movement towards  
13 the costs to serve that rate component. The costs to serve each rate component are  
14 detailed on page 3 of Mr. Larkin's Exhibit 1006.

15 **Q. Have you prepared an exhibit that shows the billing impact of this rate design**  
16 **proposal on customers receiving Primary Service under Schedule 9?**

17 A. Yes. Pages 5-7 of Exhibit 1202 show the billing comparisons between the existing  
18 rates and proposed rates for Schedule 9 Primary Service.

19 **Q. What is the revenue requirement to be recovered from Schedule 9 customers**  
20 **taking Transmission Service?**

21 A. As shown on page 4 of Mr. Larkin's Exhibit 1007, the annual revenue requirement for  
22 Schedule 9 Transmission Service customers is \$154,997; however, no class revenue  
23 increase is required to recover this revenue requirement as determined by the  
24 Company's cost-of-service study.

25 **Q. Are you proposing any other changes to Schedule 9?**  
26

1 A. Yes. The Company is proposing to change the section heading of “Power Factor” to  
2 “Power Factor Adjustment”. This clarification is a more accurate description of the  
3 section and it aligns with the “Power Factor Adjustment” headings listed under  
4 Schedules 19 and 24.

5 **C. Large Power Service, Schedule 19.**

6 **Q. What is the current rate structure for Schedule 19?**

7 A. Service under Schedule 19, just like service under Schedule 9, is provided at  
8 Secondary, Primary, and Transmission Service levels. All customers taking service  
9 under Schedule 19 pay a Service Charge, a Basic Charge, a summer On-Peak  
10 Demand Charge, and seasonal time-of-use Demand and Energy Charges.  
11 Customers taking Primary or Transmission Service may also pay a facilities charge  
12 for Company-owned facilities installed beyond Idaho Power’s Point of Delivery. In  
13 addition, Schedule 19 includes a 1,000 kW per month minimum Billing Demand and  
14 Basic Load Capacity Charge.

15 **Q. What is the revenue requirement to be recovered from Large Power Service**  
16 **customers taking service under Schedule 19 Secondary Service?**

17 A. No customers in the Company’s Oregon jurisdiction are currently served under  
18 Schedule 19 Secondary Service; therefore, there is no revenue requirement for  
19 Secondary Service. Nevertheless, the Company is proposing to increase each rate  
20 component by the same 11.19 percent of overall revenue increase determined for  
21 Schedule 9 Secondary Service. This will ensure that the current cost-of-service  
22 relationships continue to exist for Secondary Service in Schedules 9 and 19.

23 **Q. What is the revenue requirement to be recovered from Large Power Service**  
24 **customers taking Primary Service under Schedule 19?**

25 A. The annual revenue requirement for Schedule 19 Primary Service customers, as  
26 shown on page 4 of Mr. Larkin’s Exhibit 1007, is \$8,213,065.

1 **Q. Please describe the rate design proposal for Schedule 19 Primary Service.**

2 A. As determined by the Company's cost-of-service study, the rate design for Schedule  
3 19 Primary Service does not require a class revenue increase to recover the annual  
4 revenue requirement.

5 **Q. What is the revenue requirement to be recovered from Large Power Service**  
6 **customers taking service under Schedule 19 Transmission Service?**

7 A. The annual revenue requirement for Schedule 19 Transmission Service customers,  
8 as shown on page 4 of Mr. Larkin's Exhibit 1007, is \$3,690,168.

9 **Q. Have you prepared an exhibit that illustrates the proposed rate design to**  
10 **recover the annual revenue requirement for Schedule 19 Transmission**  
11 **Service?**

12 A. Yes, the rate design proposal for Schedule 19 Transmission Service is shown on  
13 page 6 of Exhibit 1201 and targets the proposed class revenue increase of 18.15  
14 percent shown on page 5 of Mr. Larkin's Exhibit 1007. For all rate components, the  
15 Company is proposing rates that represent a uniform 5 percent movement towards  
16 the costs to serve that rate component. The costs to serve each rate component are  
17 indicated on page 4 of Mr. Larkin's Exhibit 1006.

18 **Q. Have you prepared an exhibit that shows the billing comparisons between the**  
19 **existing rates and the proposed rates for Schedule 19 Transmission Service**  
20 **customers?**

21 A. Yes. Pages 8-10 of Exhibit 1202 show the billing comparisons between the existing  
22 rates and the proposed rates for Schedule 19 Transmission Service customers. As  
23 with Schedule 9 Primary Service, for each Demand level, the higher load factor  
24 customers will see a lower overall increase as compared to low load factor  
25 customers.

26

1 **II. IRRIGATION**

2 **A. Schedule 24 – Agricultural Irrigation Service.**

3 **Q. What is the current rate structure for Schedule 24?**

4 A. Service under Schedule 24 is classified as being either “in-season” or “out-of-  
5 season.” The in-season for each customer begins with the customer’s meter reading  
6 for the May billing period and ends with the customer’s meter reading for the  
7 September billing period. The out-of-season encompasses all other billing periods.

8 For the in-season, customers pay a higher monthly Service Charge than  
9 during the out-of-season to encourage customers to continue service throughout the  
10 out-of-season period.

11 Customers pay both an Energy Charge and a Demand Charge for metered  
12 usage during the in-season. The Energy Charge utilizes a load-factor pricing  
13 mechanism by separating charges into two energy blocks. The first block charges  
14 irrigation customers a monthly rate per kWh for the first 164 kWh per kW of demand.  
15 The second block charges customers a lower monthly energy rate per kWh for all  
16 other energy use to encourage installation of energy efficient irrigation systems with  
17 reduced demand and longer hours of operation. Customers pay an in-season  
18 Demand Charge only. During the out-of-season, customers pay a flat Energy  
19 Charge per kWh for all energy use.

20 Both Secondary Service and Transmission Service are available under  
21 Schedule 24, although no customers are currently taking Transmission Service.

22 **Q. What is the revenue requirement to be recovered from Schedule 24?**

23 A. The total annual revenue to be recovered from customers taking service under  
24 Schedule 24, as shown on page 5 of Mr. Larkin’s Exhibit 1007, is \$4,467,754.

25 **Q. Please describe the rate design proposal for Schedule 24.**

1 A. Consistent with the overall rate design objectives, the Company is proposing to move  
2 the individual rate components 5 percent closer to the costs indicated by Mr. Larkin's  
3 class cost-of-service study as shown on page 4 of Exhibit 1006. The rate design  
4 proposal on page 9 of Exhibit 1201 targets the capped 29.34 percent average  
5 revenue increase indicated on page 4 of Mr. Larkin's Exhibit 1007.

6 In addition to moving each rate component closer to the cost-of-service, the  
7 Company is also proposing to increase the pricing differential between energy blocks  
8 for the in-season load factor pricing mechanism. Out-of-season energy sales will not  
9 be impacted by the proposed change to the load-factor energy rates.

10 **Q. Why are you proposing to increase the differential between the current load**  
11 **factor energy pricing blocks?**

12 A. By increasing the differential between the in-season load factor energy pricing  
13 blocks, a stronger pricing signal will be sent to irrigators encouraging them to install  
14 and operate their irrigation systems in a manner that utilizes the electric system more  
15 efficiently.

16 **Q. What is the current price differential between the first and second load factor**  
17 **energy blocks?**

18 A. The current price differential between the first and second load factor energy blocks  
19 is 3 percent.

20 **Q. What price differential is the Company proposing between the first and second**  
21 **energy blocks?**

22 A. The Company is proposing to increase the load factor pricing differential from 3  
23 percent to 6 percent. As stated in my testimony in Docket No. UE 213, the 3 percent  
24 differential was established as an introductory rate design to help familiarize  
25 customers with the load factor pricing structure.

26 **Q. How were the rates for Schedule 24 Transmission Service determined?**

1 A. Once the percentage revenue change for each rate component was determined for  
2 Secondary Service, the same percentage changes were applied to each component  
3 for Transmission Service. No irrigation customers are currently served under  
4 Transmission Service.

5 **Q. Have you prepared an exhibit that shows the billing impact of the rate design**  
6 **on Schedule 24 irrigation service customers?**

7 A. Yes. Pages 11-13 of Exhibit 1202 show the impact on customers' bills of the  
8 proposed rate adjustments for Schedule 24 Secondary Service. As can be seen  
9 from Exhibit 1202, with load factor pricing, customers with the highest percentage  
10 increase in annual bills have the lowest average load factors. Similarly, the higher a  
11 customer's load factor, the more beneficial the rate structure tends to be in terms of  
12 the overall impact to the annual billing.

13 **III. LIGHTING**

14 **Q. How have you organized the discussion of the rate design proposals for area**  
15 **lighting, unmetered service, street lighting and traffic control signal lighting?**

16 A. The discussion of rate design proposals for lighting will address Schedules 15 (Dusk  
17 to Dawn Customer Lighting), 40 (Unmetered General Service), 41 (Street Lighting  
18 Service), and 42 (Traffic Control Signal Lighting Service), respectively.

19 **A. Dusk To Dawn Customer Lighting, Schedule 15.**

20 **Q. What is the current rate structure for Dusk to Dawn Customer Lighting under**  
21 **Schedule 15?**

22 A. Customers taking service under Schedule 15 are charged on a per lamp basis.  
23 Lamps currently served under Schedule 15 include 100, 200, and 400 watt high  
24 pressure sodium vapor area lighting, 200 and 400 watt high pressure sodium vapor  
25 flood lighting, and 400 and 1,000 watt metal halide flood lighting.

26



1 **Q. What is the revenue requirement to be recovered from customers taking**  
2 **service under Schedule 15?**

3 A. The annual revenue requirement for Schedule 15 customers, as shown on page 4 of  
4 Mr. Larkin's Exhibit 1007, is \$112,462.

5 **Q. Please describe the rate design proposal for Schedule 15.**

6 A. The rate design proposal for Schedule 15 is included on page 5 of Exhibit 1201 and  
7 does not include any rate adjustments to recover the proposed revenue requirement.  
8 Although no rate adjustments are required, the Company is proposing to update the  
9 monthly lamp charges based upon the actual cost-of-service for each lamp size  
10 offered under Schedule 15. My workpapers detail the updated actual cost-of-service  
11 for each lamp size.

12 **Q. Is the Company proposing any other changes to Schedule 15?**

13 A. Yes, the Company is proposing to update the facilities charge from 1.75 percent to  
14 1.51 percent to more accurately reflect current costs. The derivation of the updated  
15 facilities charge is addressed later in my testimony.

16 **B. Unmetered General Service, Schedule 40.**

17 **Q. What is the present rate structure for Unmetered General Service under**  
18 **Schedule 40?**

19 A. Customers taking service under Schedule 40 are non-metered but have energy  
20 loads and periods of operation which are fixed. A customer's estimated usage is  
21 charged a flat Energy Charge. Demand- and customer-related costs are also  
22 recovered through the Energy Charge. The minimum bill for service under Schedule  
23 40 is \$1.50 per month. With Company approval, an Intermittent Usage Charge, per  
24 unit, per month, may be charged to municipalities or agencies of federal, state, or  
25 county governments having the potential of intermittent variations in energy usage.  
26

1 **Q. What is the revenue requirement to be recovered from customers taking**  
2 **service under Schedule 40?**

3 A. The annual revenue requirement for Schedule 40 customers, as shown on page 4 of  
4 Mr. Larkin's Exhibit 1007, is \$1,133.

5 **Q. Please describe the rate design proposal for Schedule 40.**

6 A. The rate design proposal for Schedule 40 is included on page 11 of Exhibit 1201. It  
7 targets the proposed class revenue increase of 16.60 percent as shown on page 4 of  
8 Mr. Larkin's Exhibit 1007.

9 **Q. Are any other changes being proposed to Schedule 40?**

10 A. Yes. The Company is proposing to remove language in the Applicability section of  
11 Schedule 40 indicating that service under this schedule may include "street and  
12 highway lighting". The Company is proposing that all street lighting systems be  
13 served under Schedule 41, Street Lighting Service, to more accurately reflect the  
14 Company's cost to serve these types of facilities. The Company is also proposing to  
15 rename Schedule 40 from "Unmetered" General Service to "Non-Metered" General  
16 Service in an effort to maintain consistent use of terms throughout all schedules.

17 **C. Street Lighting Service, Schedule 41.**

18 **Q. What is the present rate structure for Street Lighting Service under Schedule**  
19 **41?**

20 A. The current rate structure for Schedule 41 provides two service options for street  
21 lighting customers. Option "A" provides for Idaho Power-owned and Idaho Power-  
22 maintained street lighting systems. Street lighting systems under this option are not  
23 metered and customers pay monthly lamp charges based on their choice of standard  
24 wattage high pressure sodium vapor lamps. Standard wattages include 70, 100,  
25 200, 250, and 400 watts. The monthly lamp charges under Option "A" reflect the  
26

1 Company's cost to provide energy, install the street lighting system, and provide  
2 ongoing maintenance.

3 Option "B" provides for customers choosing to own and install their own street  
4 lighting systems. Under this option, street lighting systems may be metered or non-  
5 metered. For metered systems, maintenance may be provided by the customer or  
6 by Idaho Power. For non-metered systems, Idaho Power provides maintenance.

7 As in Option "A", standard wattages include 70, 100, 200, 250, and 400 watts.  
8 The monthly lamp charges for non-metered service reflect the Company's cost to  
9 provide energy, install lamps, and provide ongoing maintenance of the lamps only.  
10 For metered systems, customers may choose to provide their own maintenance and  
11 incur a kWh charge for their energy usage only or request maintenance from Idaho  
12 Power. In the latter case, customers pay an additional monthly maintenance charge  
13 based on their choice of installed standard wattage high pressure sodium vapor  
14 lamps (70, 100, 200, 250, and 400 watts).

15 **Q. What is the revenue requirement to be recovered from customers taking**  
16 **service under Schedule 41?**

17 A. The annual revenue requirement for Schedule 41 is \$128,425 as shown on page 4 of  
18 Mr. Larkin's Exhibit 1007. Based on results from the Company's cost-of-service  
19 study, the Company is not proposing a rate adjustment to recover this revenue  
20 requirement.

21 **Q. Please describe the rate design proposal for Schedule 41.**

22 A. The rate design proposal for Schedule 41 is included on pages 12-15 of Exhibit  
23 1201. These pages outline the proposed new service options and monthly charges  
24 for street lighting service under Schedule 41.

25 **Q. Please explain why the Company is proposing to modify Schedule 41**  
26 **provisions and offer new service options.**

1 A. The Company is proposing to modify Schedule 41 in an effort to meet customer  
2 needs resulting from the introduction of new and enhanced street lighting  
3 technologies. In recent years, the Company has received a growing number of  
4 inquiries from street lighting customers, namely cities and municipalities, concerning  
5 the inability of the existing street lighting rate schedule to properly address energy  
6 charges and maintenance provisions related to new lighting technologies.

7 **Q. What specific changes is Idaho Power proposing for Schedule 41?**

8 A. Based on the Company's internal evaluation and interaction with current street  
9 lighting customers, the Company is proposing changes for street lighting service that  
10 will: 1) update all existing charges to reflect the current cost-of-service, 2) add  
11 language requiring that all new customer-owned street lighting systems installed  
12 outside of subdivisions be metered and maintained by the customer, 3) modify the  
13 existing Option "B" to apply to customer-owned and Idaho Power-maintained street  
14 lighting systems only, and 4) add a new Option "C" for customer-owned and  
15 customer-maintained street lighting systems.

16 **Q. Please describe the charges that are being updated in Schedule 41.**

17 A. The Company is proposing to update the accelerated replacement charge, lamp  
18 charges, meter charges, energy charges, and facilities charges in an effort to more  
19 accurately represent actual costs.

20 **Q. How did the Company update these charges to reflect the actual cost-of-**  
21 **service?**

22 A. The Company conducted a new cost-of-service analysis for the accelerated  
23 replacement charge, lamp charges, meter charges, and energy charges under  
24 Schedule 41. The update to the facilities charge under Schedule 41 is described  
25 later in my testimony.

26

1 **Q. Please describe the methodology used in cost-of-service analysis to update**  
2 **charges.**

3 A. The cost-of-service methodology used to update the accelerated replacement  
4 charge, lamp charges, meter charges, and energy charges determined the actual  
5 cost to provide these services. The analysis examined the Company's labor costs,  
6 lamp and fixture costs, maintenance costs, sales taxes, overheads, vehicle costs,  
7 metering costs, and energy costs to determine the updated charges. A complete  
8 breakout of these costs and the methodology used to update charges is contained in  
9 my workpapers.

10 **Q. Please describe the proposed service options under the proposed Schedule**  
11 **41.**

12 A. The Company is proposing to offer three service options under Schedule 41:

- 13 • "A" – Idaho Power-Owned, Idaho Power-Maintained System
- 14 • "B"- Customer-Owned, Idaho Power-Maintained System
- 15 • "C" – Customer-Owned, Customer-Maintained System

16 Options "A" and "B" are currently offered under Schedule 41 while Option "C" is a  
17 newly proposed section.

18 **Q. Please describe Option "A".**

19 A. Option "A" provides for non-metered, high pressure sodium vapor lighting systems  
20 that are installed, owned, operated, and maintained by Idaho Power. Customers  
21 choosing this option are required to pay a monthly per lamp charge to cover the cost  
22 of energy, materials, and maintenance provided by the Company.

23 **Q. Please describe the proposed updates to Option "A".**

24 A. In an effort to clarify the requirements for receiving service under Option "A", the  
25 Company is proposing to change the heading from "Overhead Lighting – Company-  
26 Owned System" to "Idaho Power-Owned, Idaho Power-Maintained System". As

1 mentioned above, all existing lamp, pole, and facilities charges have been updated to  
2 more accurately reflect the current cost of providing street lighting service.

3 **Q. Is the Company proposing to offer any new lighting technologies, such as light**  
4 **emitting diodes (LEDs), under Option “A”?**

5 A. No. Idaho Power is not proposing to offer new lighting technologies on Idaho Power-  
6 owned street lighting systems due to high product costs and unproven energy and  
7 maintenance savings. Although LEDs are an attractive option for customers  
8 receiving federal grants or other forms of additional funding, the Company has  
9 determined that the monthly charges needed to offer these products on its own  
10 lighting systems would be too high to attract customer participation. This was  
11 confirmed in an informal assessment of existing street lighting customers.  
12 Nevertheless, the Company will continue to evaluate the cost, energy savings, and  
13 maintenance savings of LEDs and other new lighting technologies on an ongoing  
14 basis.

15 **Q. What changes are being proposed for Option “B” in Schedule 41?**

16 A. Option “B” has been modified to include customer-owned and Idaho Power-  
17 maintained street lighting systems only. This service option will only be offered to  
18 existing customers that desire to have Idaho Power maintain their high pressure  
19 sodium vapor street light systems. As proposed, no new service will be allowed  
20 under this option as the Company implements its new policy requiring that all new  
21 customer-owned systems are metered and maintained by the customer. In Oregon,  
22 since all existing lighting systems under Option “B” are non-metered and no new  
23 service is proposed for this option, the Company is proposing to remove all monthly  
24 charges for Metered Service under this option.

25 **Q. Why are you proposing to add Option “C” to Schedule 41?**

26

1 A. The proposed provisions and charges under Option "C" are designed for customers  
2 that own their own lighting systems and desire to install new and unique lighting  
3 technologies and designs that are not offered by the Company. This option will also  
4 allow customers with non-metered systems to provide their own maintenance without  
5 being charged for Idaho Power-provided maintenance, as is the case under the  
6 current rate design.

7           Ultimately, over time, the Company anticipates that Option "C" will become  
8 the primary service option for customer-owned street lighting systems as it  
9 transitions to requiring meters and customer-provided maintenance on all new  
10 customer-owned lighting systems. This new provision will provide customers greater  
11 flexibility as they seek to install new and unique lighting technologies that are not  
12 standard to Idaho Power.

13 **Q. Is the Company proposing to require metering on street lighting systems**  
14 **installed inside subdivisions?**

15 A. No. The Company is not proposing to require metering on street lighting systems  
16 installed inside subdivisions for two reasons: 1) this requirement would create  
17 additional maintenance costs for customers and 2) this requirement would require  
18 installation of duplicate infrastructure.

19           Typically, developers of subdivisions are required to install street lighting  
20 systems inside subdivisions at the request of municipalities or agencies of federal,  
21 state, or county governments. Once installed, the municipality assumes ownership  
22 of the street lighting system and provides ongoing maintenance. As pointed out in  
23 conversations with various cities, a requirement to install meters for street lighting  
24 inside of subdivisions would necessitate installation of duplicate infrastructure and  
25 would not be supported by some municipalities. In many cases, developers would  
26 need to install meter cabinets, a second conduit/circuit system for the lighting, and in

1 some cases a third conduit/circuit for the irrigation system power. In the long-term,  
2 cities would have to maintain the second circuit system including dig-line markings,  
3 additional junction boxes and connections, as well as multiple meter cabinets.

4 **D. Traffic Control Signal Lighting Service, Schedule 42.**

5 **Q. What is the present rate structure for Schedule 42?**

6 A. Customers taking service under Schedule 42 pay an Energy Charge for each kWh of  
7 estimated energy use for non-metered systems and for each kWh of actual usage for  
8 metered systems. For non-metered systems, usage is estimated based on the  
9 number and size of lamps burning simultaneously in each signal and the average  
10 number of hours per day the signal is operated. There is no minimum charge under  
11 Schedule 42.

12 **Q. What is the revenue requirement to be recovered from customers taking**  
13 **service under Schedule 42?**

14 A. The annual revenue requirement for Schedule 42 customers, as shown on page 4 of  
15 Mr. Larkin's Exhibit 1007, is \$1,592.

16 **Q. Please describe the rate design proposal for Schedule 42.**

17 A. The rate design proposal for Schedule 42 is included on page 16 of Exhibit 1201. It  
18 targets the proposed capped class revenue increase of 29.34 percent shown on  
19 page 4 of Mr. Larkin's Exhibit 1007.

20 **IV. FACILITIES CHARGES**

21 **Q. What change is the Company proposing to facilities charges?**

22 A. The Company is proposing to update the rates that customers pay under Idaho  
23 Power's facilities charge provisions to more accurately reflect the Company's current  
24 costs to own, operate, and maintain facilities installed beyond Idaho Power's Point of  
25 Delivery.

26 **Q. How are the current facilities charge rates established?**



1 A. The effective facilities charge rates in the Company's Oregon jurisdiction are set  
2 equal to the facilities charge rates in its Idaho jurisdiction. Because the Company  
3 recently filed to update its facilities charge rates in Idaho (Case No. IPC-E-11-08), it  
4 is proposing to update its facilities charge rates in Oregon to maintain existing cost-  
5 of-service relationships.

6 **Q. Please explain Idaho Power's existing facilities charge provisions.**

7 A. At the option of the Company, facilities charges may be offered to Primary and  
8 Transmission Service level customers under Schedule 9 (Large General Service)  
9 and Schedule 19 (Large Power Service). Facilities charges may be offered to  
10 Transmission Service level customers only under Schedule 24 (Agricultural Irrigation  
11 Service). If offered, and in consideration of a Customer paying a monthly facilities  
12 charge, the Company will own, operate, and maintain facilities installed beyond  
13 Idaho Power's Point of Delivery.

14 As of August 8, 2005, customers taking service under Schedule 15 (Dusk to  
15 Dawn Customer Lighting) and Schedule 41 (Street Lighting Service) were no longer  
16 eligible for facilities charges although some customers continue to pay monthly  
17 facilities charges for facilities installed prior to August 8, 2005.

18 **Q. What rates do eligible customers pay under the current facilities charge  
19 provisions?**

20 A. Customers taking Primary or Transmission Service under Schedules 9 and 19, and  
21 Transmission Service under Schedule 24, pay a facilities charge rate of 1.7 percent  
22 per month of the Company's total investment in facilities installed beyond Idaho  
23 Power's Point of Delivery.

24 Customers taking service under Schedules 15 and 41 pay a facilities charge  
25 rate of 1.75 percent per month of the Company's investment in facilities installed  
26 prior to August 8, 2005. Eligible facilities installed under Schedules 15 and 41

1 included overhead secondary, poles, anchors, and underground circuits. Costs for  
2 these facilities are charged through work orders.

3 **Q. What monthly rates is the Company proposing for facilities charges?**

4 A. The Company is proposing to update the monthly facilities charge rate to 1.41  
5 percent for customers taking Primary or Transmission Service under Schedules 9  
6 and 19. The Company is also proposing a rate of 1.41 percent for customers taking  
7 Transmission Service under Schedule 24.

8 For customers taking service under Schedule 15, the Company is proposing  
9 a rate of 1.51 percent per month and for Schedule 41, the Company is proposing a  
10 rate of 1.21 percent per month.

11 **Q. What cost components were used to update the current facilities charge rates?**

12 A. The cost components used to update the facilities charge rates include:

- 13 • Rate of Return
- 14 • Depreciation
- 15 • Income Taxes
- 16 • Property Taxes
- 17 • Other Taxes (Regulatory Fees)
- 18 • Operation and Maintenance Expenses
- 19 • Administration and General Expenses
- 20 • Working Capital
- 21 • Insurance

22 **Q. Please describe the individual cost components that are used to derive the**  
23 **Company's facilities charges.**

24 A. The cost components used to derive the Company's facilities charges are the same  
25 components included in the Company's revenue requirement for like facilities.  
26 Descriptions of each cost component are as follows:

1                   Rate of Return – Idaho Power’s cost of financing its original  
2 investment in facilities. This uses a weighted average of the Company’s cost  
3 of debt and cost of equity. The facilities charge methodology uses a level  
4 payment stream to simplify the rate calculation and the administration of the  
5 facilities charge. The Rate of Return used to determine the facilities charge  
6 will be the Rate of Return ordered by the Commission in this filing.

7                   Booked Depreciation – The straight-line annual depreciation of assets  
8 based on a levelized 31-year basis.

9                   Income Taxes – The tax that Idaho Power pays on the amount of  
10 revenue received from the equity portion of the Rate of Return.

11                   Property Taxes – The tax that Idaho Power pays for its distribution  
12 facilities. Each dollar the Company invests beyond the Point of Delivery is  
13 assessed property taxes.

14                   Other Taxes (Regulatory Fees) – The taxes and fees that Idaho  
15 Power pays to the Idaho and Oregon public utilities commissions. A portion  
16 of these fees is tied to the Company’s distribution investment which includes  
17 facilities installed beyond the Company’s Point of Delivery.

18                   Operation and Maintenance Expenses – Includes all of Idaho Power’s  
19 costs to operate and maintain its distribution facilities. This cost component  
20 represents an average maintenance rate for all distribution equipment.

21                   Administration and General Expenses – Represents an expense  
22 based on total Administration and General as a percentage of total plant  
23 investment.

24                   Working Capital – Working Capital is the carrying cost of inventory.  
25 Working Capital is based on the cost of capital to finance the distribution  
26

1 facilities inventory and the property taxes that the Company pays on its  
2 inventory.

3 Insurance – The insurance rate reflects the additional cost Idaho  
4 Power incurs for insurance premiums resulting from facilities installed beyond  
5 the Company’s Point of Delivery. This insurance rate covers property,  
6 casualty, and worker’s compensation. It does not cover facility replacement  
7 costs for failed facilities.

8 **Q. What are the proposed percentage amounts for each cost component by rate  
9 class?**

10 A. The proposed percentage amounts used to derive the proposed facilities charge  
11 rates are as follows:

	<b>Cost Components</b>	<b>Rate 15</b>	<b>Rate 19</b>	<b>Rate 41</b>
13	1 Rate of Return	4.81%	4.81%	4.81%
14	2 Book Depreciation	3.23%	3.23%	3.23%
15	3 Income Taxes	1.90%	1.90%	1.90%
16	4 Property Taxes	0.56%	0.56%	0.56%
17	5 Other Taxes (Regulatory Fees)	0.14%	0.14%	0.14%
18	6 Operation & Maintenance	4.73%	3.58%	1.18%
19	7 Administration & General	2.28%	2.28%	2.28%
20	8 Working Capital	0.14%	0.14%	0.14%
	9 Insurance	<u>0.32%</u>	<u>0.32%</u>	<u>0.32%</u>
	10 Annual Total	18.10%	17.00%	14.60%
	11 Monthly Rate	1.51%	1.41%	1.21%

21 **Q. Please explain why Schedules 9 and 24 are not identified in the table.**

22 A. Under Idaho Power’s approved rate schedules, the facilities charge rates for  
23 Schedules 9 and 24 are aligned with the derived rate for Schedule 19.

24 **Q. What cost component has driven the proposed reduction in the facilities  
25 charge rates?**

26

1 A. The primary cost component that has driven the reduction in the facilities charge  
2 rates is the Rate of Return, which has decreased since the last update.

3 **Q. What is the estimated reduction in the Company's revenue from the proposed**  
4 **facilities charge rates?**

5 A. The estimated reduction in revenue received through facilities charges in the Oregon  
6 jurisdiction under the Company's proposal is approximately \$76,200 per year.

7 **Q. How will the reduction in revenue for facilities charges affect the energy rates**  
8 **of customer classes?**

9 A. The reduction in revenue will result in higher revenue requirements for each  
10 customer class that collects facilities charge revenue, namely Schedules 9, 15, 19,  
11 24, and 41. In turn, the energy rates for these customer classes will increase slightly  
12 to recover the decline in facilities charge revenue.

13 **Q. Does this conclude your testimony?**

14 A. Yes.

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Scott D. Sparks  
Calculation of Revenue Impact

July 29, 2011

**Idaho Power Company**  
**Calculation of Revenue Impact**  
**State of Oregon**  
**2011 General Rate Case Filing**  
**Filed July 29, 2011**

**Small General Service**  
**Schedule 7**

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge:							
2	Single-Phase	24,881	8.60	\$213,977	10.00	\$248,811	\$34,834	16.28%
3	Three Phase	4,824	17.20	\$82,975	18.00	\$86,834	\$3,859	4.65%
4	Total Billings	29,705		\$296,952		\$335,645	\$38,693	13.03%
5	Minimum Charge	35	3.00	\$106	3.00	\$106	\$0	0.00%
6	Energy Charge							
7	Summer							
8	0-500 kWh	2,093,316	0.064775	\$135,595	0.066540	\$139,289	\$3,694	2.72%
9	Over 500 kWh	2,304,996	0.085776	\$197,713	0.091026	\$209,815	\$12,102	6.12%
10	Summer Energy	4,398,313		\$333,308		\$349,104	\$15,796	4.74%
11	Non-Summer							
12	0-500 kWh	6,214,174	0.064775	\$402,523	0.066540	\$413,491	\$10,968	2.72%
13	Over 500 kWh	7,230,410	0.072819	\$526,511	0.074155	\$536,171	\$9,660	1.83%
14	Non-Summer Energy	13,444,583		\$929,034		\$949,662	\$20,628	2.22%
15	Total Energy	17,842,896		\$1,262,342		\$1,298,766	\$36,424	2.89%
16	Total Revenue			\$1,559,400		\$1,634,517	\$75,117	4.82%
17	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
18	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
19	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
20	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
21	Total Billed Revenue			\$1,559,400		\$1,634,517	\$75,117	4.82%

Idaho Power Company  
 Calculation of Revenue Impact  
 State of Oregon  
 2011 General Rate Case Filing  
 Filed July 29, 2011

Large General Service - Secondary  
 Schedule 9

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge:							
2	Single-Phase	4,309	9.50	\$40,940	11.00	\$47,404	\$6,464	15.79%
3	Three Phase	6,390	16.75	\$107,036	19.00	\$121,414	\$14,378	13.43%
4	Total Billings	10,700		\$147,976		\$168,818	\$20,842	14.08%
5	Minimum Charge	8	5.00	\$41	5.00	\$41	\$0	0.00%
6	Basic Charge (per kW)	505,535	0.50	\$252,768	0.75	\$379,151	\$126,383	50.00%
7	Demand Charge							
8	Summer	82,732	4.90	\$405,388	6.03	\$498,876	\$93,488	23.06%
9	Non-Summer	280,625	4.12	\$1,156,174	4.53	\$1,271,230	\$115,056	9.95%
10	Total Demand	363,357		\$1,561,562		\$1,770,106	\$208,544	13.35%
11	Energy Charge							
12	Summer	25,642,384	0.046904	\$1,202,730	0.050845	\$1,303,787	\$101,057	8.40%
13	Non-Summer	88,613,835	0.043005	\$3,810,838	0.046658	\$4,134,544	\$323,706	8.49%
14	Total Energy	114,256,219		\$5,013,568		\$5,438,331	\$424,763	8.47%
15	Total Revenue			\$6,975,915		\$7,756,447	\$780,532	11.19%
16	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
17	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
18	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
19	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
20	Total Billed Revenue			\$6,975,915		\$7,756,447	\$780,532	11.19%



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Large General Service - Primary  
Schedule 9

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	60	200.00	\$12,000	207.00	\$12,420	\$420	3.50%
2	Minimum Charge	0	10.00	\$0	10.00	\$0	\$0	0.00%
3	Basic Charge (per kW)	44,344	0.97	\$43,014	1.17	\$51,882	\$8,868	20.62%
4	<u>Demand Charge</u>							
5	Summer	8,596	4.70	\$40,399	5.61	\$48,221	\$7,822	19.36%
6	Non-Summer	26,370	4.35	\$114,711	4.58	\$120,776	\$6,065	5.29%
7	Total Demand	34,966		\$155,110		\$168,997	\$13,887	8.95%
8	On-Peak Summer	8,411	0.69	\$5,803	0.82	\$6,897	\$1,094	18.85%
9	<u>Energy Charge</u>							
10	Summer On-peak	1,006,729	0.044884	\$45,186	0.046211	\$46,522	\$1,336	2.96%
11	Summer Mid-peak	1,545,559	0.041992	\$64,901	0.043226	\$66,808	\$1,907	2.94%
12	Summer Off-peak	1,097,115	0.040101	\$43,995	0.041279	\$45,288	\$1,293	2.94%
13	Total Summer	3,649,404		\$154,082		\$158,618	\$4,536	2.94%
14	Non-Summer Mid-peak	7,022,860	0.037856	\$265,857	0.039061	\$274,320	\$8,463	3.18%
15	Non-Summer Off-peak	4,426,824	0.036648	\$162,234	0.037814	\$167,396	\$5,162	3.18%
16	Total Non-Summer	11,449,684		\$428,091		\$441,716	\$13,625	3.18%
17	Total Energy	15,099,088		\$582,173		\$600,334	\$18,161	3.12%
18	Total Revenue			\$798,100		\$840,530	\$42,430	5.32%
19	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
20	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
21	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
22	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
23	Total Billed Revenue			\$798,100		\$840,530	\$42,430	5.32%

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Large General Service - Transmission  
 Schedule 9

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	12	200.00	\$2,400	200.00	\$2,400	\$0	0.00%
2	Minimum Charge	0	10.00	\$0	10.00	\$0	\$0	0.00%
3	Basic Charge (per kW)	13,732	0.30	\$4,119	0.30	\$4,119	\$0	0.00%
4	<u>Demand Charge</u>							
5	Summer	3,114	3.59	\$11,180	3.59	\$11,180	\$0	0.00%
6	Non-Summer	8,667	3.84	\$33,282	3.84	\$33,282	\$0	0.00%
7	Total Demand	11,782		\$44,462		\$44,462	\$0	0.00%
8	On-Peak Summer	2,100	0.69	\$1,449	0.69	\$1,449	\$0	0.00%
9	<u>Energy Charge</u>							
10	Summer On-peak	176,357	0.042176	\$7,438	0.042176	\$7,438	\$0	0.00%
11	Summer Mid-peak	293,331	0.039483	\$11,582	0.039483	\$11,582	\$0	0.00%
12	Summer Off-peak	170,420	0.037722	\$6,429	0.037722	\$6,429	\$0	0.00%
13	Total Summer	640,108		\$25,449		\$25,449	\$0	0.00%
14	Non-Summer Mid-peak	1,302,103	0.035631	\$46,395	0.035631	\$46,395	\$0	0.00%
15	Non-Summer Off-peak	890,298	0.034507	\$30,721	0.034507	\$30,721	\$0	0.00%
16	Total Non-Summer	2,192,401		\$77,116		\$77,116	\$0	0.00%
17	Total Energy	2,832,509		\$102,565		\$102,565	\$0	0.00%
18	Total Revenue			\$154,995		\$154,995	\$0	0.00%
19	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
20	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
21	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
22	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
23	Total Billed Revenue			\$154,995		\$154,995	\$0	0.00%

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**Dusk-to-Dawn Customer Lighting**  
**Schedule 15**

Line No	Description	(1) Use	(2) Lamps	(3) Current Base Rate	(4) Current Base Revenue	(5) Proposed Base Rate	(6) Proposed Base Revenue	(7) Revenue Difference	(8) Percent Change
1	Area Lighting:								
2	High Pressure Sodium Vapor:								
3	100 Watt	346,288	8,879	9.62	85,416	10.37	92,075	\$6,659	7.80%
4	200 Watt	57,522	778	15.38	11,966	12.40	9,647	(\$2,319)	(19.38)%
5	400 Watt	28,366	181	24.37	4,411	16.96	3,070	(\$1,341)	(30.40)%
6	Flood Lighting:								
7	High Pressure Sodium Vapor:								
8	200 Watt	19,611	265	18.66	4,945	15.00	3,975	(\$970)	(19.62)%
9	400 Watt	32,149	205	27.67	5,672	17.77	3,643	(\$2,029)	(35.77)%
10	Metal Halide:								
11	400 Watt	0	0	30.93	0	16.26	0	\$0	0.00%
12	1000 Watt	0	0	56.22	0	26.07	0	\$0	0.00%
13	Total	483,936	10,308		112,410		112,410	\$0	0.00%
14	Minimum Charge		17.6	3.00	53	3.00	53	\$0	0.00%
15	Total Revenue				\$112,463		\$112,463	\$0	0.00%
16	Solar PV Pilot Program Rider			0.00%	\$0	0.00%	\$0	\$0	0.00%
17	Energy Efficiency Rider			0.00%	\$0	0.00%	\$0	\$0	0.00%
18	PSA			0.000000	\$0	0.000000	\$0	\$0	0.00%
19	APCU - March Forecast			0.000000	0	0.000000	0	\$0	0.00%
20	Total Billed Revenue				\$112,463		\$112,463	\$0	0.00%

**Idaho Power Company**  
**Calculation of Revenue Impact**  
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**Large Power Service - Secondary**  
**Schedule 19**

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	0	200.00	\$0	222.00	\$0	\$0	0.00%
2	Minimum Charge	0	10.00	\$0	10.00	\$0	\$0	0.00%
3	Basic Charge (per kW)	0	0.50	\$0	0.56	\$0	\$0	0.00%
4	<u>Demand Charge</u>							
5	Summer	0	4.21	\$0	4.68	\$0	\$0	0.00%
6	Non-Summer	0	4.12	\$0	4.58	\$0	\$0	0.00%
7	Total Demand	0		\$0		\$0	\$0	0.00%
8	On-Peak Summer	0	0.69	\$0	0.77	\$0	\$0	0.00%
9	<u>Energy Charge</u>							
10	Summer	0	0.050984	\$0	0.056689	\$0	\$0	0.00%
11	On-Peak	0	0.040142	\$0	0.044634	\$0	\$0	0.00%
12	Mid-Peak	0	0.035457	\$0	0.039425	\$0	\$0	0.00%
13	Off-Peak	0		\$0		\$0	\$0	0.00%
14	Non-Summer	0	0.037893	\$0	0.042133	\$0	\$0	0.00%
15	Mid-Peak	0	0.034278	\$0	0.038114	\$0	\$0	0.00%
16	Off-Peak	0		\$0		\$0	\$0	0.00%
17	Total Energy	0		\$0		\$0	\$0	0.00%
18	Total Revenue			\$0		\$0	\$0	0.00%
19	Solar PV Pilot Program Rider			\$0		\$0	\$0	0.00%
20	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
21	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
22	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
23	Total Billed Revenue			\$0		\$0	\$0	0.00%

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Large Power Service - Primary  
 Schedule 19

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	72	200.00	\$14,400	200.00	\$14,400	\$0	0.00%
2	Minimum Charge	0	10.00	\$0	10.00	\$0	\$0	0.00%
3	Basic Charge (per kW)	358,346	0.97	\$347,596	0.97	\$347,596	\$0	0.00%
4	<u>Demand Charge</u>							
5	Summer	82,590	4.70	\$388,174	4.70	\$388,174	\$0	0.00%
6	Non-Summer	246,450	4.35	\$1,072,055	4.35	\$1,072,055	\$0	0.00%
7	Total Demand	329,040		\$1,460,229		\$1,460,229	\$0	0.00%
8	On-Peak Summer	79,648	0.69	\$54,957	0.69	\$54,957	\$0	0.00%
9	<u>Energy Charge</u>							
10	Summer							
11	On-Peak	10,986,763	0.047848	\$525,695	0.047848	\$525,695	\$0	0.00%
12	Mid-Peak	18,803,597	0.037752	\$709,873	0.037752	\$709,873	\$0	0.00%
13	Off-Peak	14,380,542	0.033390	\$480,166	0.033390	\$480,166	\$0	0.00%
14	Non-Summer							
15	Mid-Peak	77,285,191	0.035658	\$2,755,835	0.035658	\$2,755,835	\$0	0.00%
16	Off-Peak	57,732,954	0.032292	\$1,864,313	0.032292	\$1,864,313	\$0	0.00%
17	Total Energy	179,189,047		\$6,335,882		\$6,335,882	\$0	0.00%
18	Total Revenue			\$8,213,064		\$8,213,064	\$0	0.00%
19	Solar PV Pilot Program Rider			\$0	0.00%	\$0	\$0	0.00%
20	Energy Efficiency Rider			\$0	0.00%	\$0	\$0	0.00%
21	PSA			\$0	0.000000	\$0	\$0	0.00%
22	APCU - March Forecast			\$0	0.000000	\$0	\$0	0.00%
23	Total Billed Revenue			\$8,213,064		\$8,213,064	\$0	0.00%

**Idaho Power Company**  
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**Large Power Service - Transmission**  
**Schedule 19**

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Service Charge	12	200.00	\$2,400	237.00	\$2,844	\$444	18.50%
2	Minimum Charge	0	10.00	\$0	10.00	\$0	\$0	0.00%
3	Basic Charge (per kW)	165,068	0.30	\$49,520	0.34	\$56,123	\$6,603	13.33%
4	<u>Demand Charge</u>							
5	Summer	52,429	3.59	\$188,222	4.98	\$261,099	\$72,877	38.72%
6	Non-Summer	100,121	3.84	\$384,463	4.71	\$471,568	\$87,105	22.66%
7	Total Demand	152,550		\$572,685		\$732,667	\$159,982	27.94%
8	On-Peak Summer	51,982	0.69	\$35,868	0.96	\$49,903	\$14,035	39.13%
9	<u>Energy Charge</u>							
10	Summer							
11	On-Peak	6,439,218	0.044001	\$283,332	0.050816	\$327,215	\$43,883	15.49%
12	Mid-Peak	12,068,104	0.035013	\$422,541	0.040434	\$487,962	\$65,421	15.48%
13	Off-Peak	10,000,842	0.031110	\$311,126	0.035925	\$359,280	\$48,154	15.48%
14	Non-Summer							
15	Mid-Peak	25,204,122	0.033017	\$832,165	0.038230	\$963,554	\$131,389	15.79%
16	Off-Peak	20,443,581	0.030022	\$613,757	0.034760	\$710,619	\$96,862	15.78%
17	Total Energy	74,155,867		\$2,462,921		\$2,848,630	\$385,709	15.66%
18	Total Revenue			\$3,123,394		\$3,690,167	\$566,773	18.15%
19	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
20	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
21	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
22	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
23	Total Billed Revenue			\$3,123,394		\$3,690,167	\$566,773	18.15%

**Idaho Power Company**  
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**Agricultural Irrigation Service - Secondary**  
**Schedule 24**

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	<u>Service Charge</u>							
2	In-Season	6,478	15.00	\$97,176	22.00	\$142,525	\$45,349	46.67%
3	Out-Season	12,503	3.00	\$37,508	3.50	\$43,759	\$6,251	16.67%
4	Total	18,981		\$134,684		\$186,284	\$51,600	38.31%
5	Minimum Charge	247	3.00	\$740	3.00	\$740	\$0	0.00%
6	<u>Demand Charge</u>							
7	In-Season	106,958	6.05	\$647,098	9.00	\$962,626	\$315,528	48.76%
8	Out-Season	33,431	0.00	\$0	0.00	\$0	\$0	0.00%
9	Total Demand	140,390		\$647,098		\$962,626	\$315,528	48.76%
10	<u>Current Energy Charge</u>							
11	In-Season							
12	First 164 kWh per kW	18,227,779	0.057355	\$1,045,454	0.072459	\$1,320,767	\$275,313	26.33%
13	All Other kWh In-Season	21,363,206	0.055992	\$1,196,169	0.068358	\$1,460,346	\$264,177	22.09%
14	Total In-Season			\$2,241,623		\$2,781,113	\$539,490	24.07%
15	Out-Season	7,058,280	0.060939	\$430,125	0.076079	\$536,987	\$106,862	24.84%
16	Total Energy	46,649,265		\$2,671,748		\$3,318,100	\$646,352	24.19%
17	Total Revenue			\$3,454,270		\$4,467,750	\$1,013,480	29.34%
18	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
19	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
20	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
21	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
22	Total Billed Revenue			\$3,454,270		\$4,467,750	\$1,013,480	29.34%

**Idaho Power Company**  
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**Agricultural Irrigation Service - Transmission**  
**Schedule 24**

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	<u>Service Charge</u>							
2	In-Season	0	128.00	\$0	188.00	\$0	\$0	0.00%
3	Out-Season	0	3.00	\$0	3.50	\$0	\$0	0.00%
4	Total	0		\$0		\$0	\$0	0.00%
5	Minimum Charge	0	3.00	\$0	3.00	\$0	\$0	0.00%
6	<u>Demand Charge</u>							
7	In-Season	0	5.70	\$0	8.48	\$0	\$0	0.00%
8	Out-Season	0	0.00	\$0	0.00	\$0	\$0	0.00%
9	Total Demand	0		\$0		\$0	\$0	0.00%
10	<u>Current Energy Charge</u>							
11	In-Season							
12	First 164 kWh per kW	0	0.055533	\$0	0.070157	\$0	\$0	0.00%
13	All Other kWh In-Season	0	0.054224	\$0	0.066200	\$0	\$0	0.00%
14	Total In-Season			\$0		\$0	\$0	0.00%
15	Out-Season	0	0.058977	\$0	0.073629	\$0	\$0	0.00%
16	Total Energy	0		\$0		\$0	\$0	0.00%
17	Total Revenue			\$0		\$0	\$0	0.00%
18	Solar PV Pilot Program Rider			\$0	0.00%	\$0	\$0	0.00%
19	Energy Efficiency Rider			\$0	0.00%	\$0	\$0	0.00%
20	PSA			\$0	0.000000	\$0	\$0	0.00%
21	APCU - March Forecast			\$0	0.000000	\$0	\$0	0.00%
22	Total Billed Revenue			\$0		\$0	\$0	0.00%



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**Unmetered General Service**  
**Schedule 40**

Line No	<u>Description</u>	(1) <u>Use</u>	(2) Current Base <u>Rate</u>	(3) Current Base <u>Revenue</u>	(4) Proposed Base <u>Rate</u>	(5) Proposed Base <u>Revenue</u>	(6) Revenue <u>Difference</u>	(7) Percent <u>Change</u>
1	Number of Billings	36						
2	<u>Energy Charge</u>							
3	Total Energy	12,900	0.075250	\$971	0.087740	\$1,132	\$161	16.60%
4	Total Revenue			\$971		\$1,132	\$161	16.60%
5	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
6	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
7	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
8	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
9	Total Billed Revenue			\$971		\$1,132	\$161	16.60%

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Street Lighting Service  
Schedule 41

Line No	Description	(1) Use	Summary				(7) Percent Change	
			(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue		(6) Revenue Difference
1	A - Company-Owned, Non-Metered, Maintenance			120,468		126,266	\$5,798	4.81%
2	B - Customer-Owned, Non-Metered, Maintenance			1,265		715	(\$550)	(43.48)%
3	C - Customer-Owned, Non-Metered, No Maintenance			0		0	\$0	0.00%
4	CM - Customer-Owned, Metered, No Maintenance			2,118		1,446	(\$672)	(31.73)%
5	Total Bills	168						
6	Total kWh	778,108						
7	Total Revenue		\$123,851		\$128,427	\$4,576		3.69%
8	Solar PV Pilot Program Rider		\$0		0.00%	\$0	\$0	0.00%
9	Energy Efficiency Rider		\$0		0.00%	\$0	\$0	0.00%
10	PSA		\$0		0.000000	\$0	\$0	0.00%
11	APCU - March Forecast		\$0		0.000000	\$0	\$0	0.00%
12	Total Billed Revenue		\$123,851		\$128,427	\$4,576		3.69%

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Schedule 41 - Street Lighting Service (cont'd)

Line No	Description	(1) Annual Lamps	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	<b>A - Company-Owned, Non-Metered, Maintenance</b>							
2	<u>Sodium Vapor</u>							
3	70 Watt	0	8.38	0	7.85	0	\$0	0.00%
4	100 Watt	10,061	8.32	83,708	8.50	85,519	\$1,811	2.16%
5	200 Watt	1,983	10.00	19,831	11.47	22,746	\$2,915	14.70%
6	250 watt	309	11.04	3,411	12.53	3,872	\$461	13.52%
7	400 Watt	986	13.71	13,518	14.33	14,129	\$611	4.52%
8	Total Sodium Vapor	13,339		120,468		126,266	\$5,798	4.81%
9	A - Company-Owned, Non-Metered, Maintenance			\$120,468		\$126,266	\$5,798	4.81%
10	<b>B - Customer-Owned, Non-Metered, Maintenance</b>							
11	<u>Sodium Vapor</u>							
12	70 Watt	0	4.79	0	1.93	0	\$0	0.00%
13	100 Watt	12	4.98	60	2.47	30	(\$30)	(50.00)%
14	200 Watt	148	6.68	989	3.71	549	(\$440)	(44.49)%
15	250 watt	12	7.70	92	4.65	56	(\$36)	(39.13)%
16	400 Watt	12	10.37	124	6.70	80	(\$44)	(35.48)%
17	Total Sodium Vapor	184		1,265		715	(\$550)	(43.48)%
18	B - Customer-Owned, Non-Metered, Maintenance			\$1,265		\$715	(\$550)	(43.48)%

Idaho Power Company  
 Calculation of Revenue Impact  
 State of Oregon  
 2011 General Rate Case Filing  
 Filed July 29, 2011

Schedule 41 - Street Lighting Service (cont'd)

Line No	Description	(1) Annual Lamps	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	<b>C - Customer-Owned, Non-Metered, No Maintenance</b>							
2	<u>Energy Charge</u>							
3	Per kWh	0	0.050670	\$0	0.035865	\$0	\$0	0.00%
4	C - Customer-Owned, Non-Metered, No Maintenance			\$0		\$0	\$0	0.00%
5	<b>CM - Customer-Owned, Metered, No Maintenance</b>							
6	Meter Charge	19	8.00	152	2.90	55	(\$97)	(63.82)%
7	Energy Charge							
8	per kWh	38,795	0.050670	1,966	0.035865	1,391	(\$575)	(29.25)%
9	CM - Customer-Owned, Metered, No Maintenance			\$2,118		\$1,446	(\$672)	(31.73)%

Idaho Power Company  
 Calculation of Revenue Impact  
 State of Oregon  
 2011 General Rate Case Filing  
 Filed July 29, 2011

Traffic Control Signal Lighting Service  
 Schedule 42

Line No	Description	(1) Use	(2) Current Base Rate	(3) Current Base Revenue	(4) Proposed Base Rate	(5) Proposed Base Revenue	(6) Revenue Difference	(7) Percent Change
1	Number of Billings	72						
2	<u>Energy Charge</u>							
3	Total Energy	16,328	0.075380	\$1,231	0.097500	\$1,592	\$361	29.34%
4	Total Revenue			\$1,231		\$1,592	\$361	29.34%
5	Solar PV Pilot Program Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
5	Energy Efficiency Rider		0.00%	\$0	0.00%	\$0	\$0	0.00%
6	PSA		0.000000	\$0	0.000000	\$0	\$0	0.00%
7	APCU - March Forecast		0.000000	\$0	0.000000	\$0	\$0	0.00%
8	Total Billed Revenue			\$1,231		\$1,592	\$361	29.34%

Idaho Power/1202  
Witness: Scott D. Sparks

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

IDAHO POWER COMPANY

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Exhibit Accompanying Testimony of Scott D. Sparks  
Typical Monthly Billing Comparison

July 29, 2011

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**  
 Schedule 7, Small General Service - Single Phase

Line No	Energy kWh	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
		Summer			Non-Summer			Avg Mth Cost -12 Mths		
		Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference	Current Revenue	Proposed Revenue	Percent Difference
1	100	15.08	16.65	10.46%	15.08	16.65	10.46%	15.08	16.65	10.41%
2	200	21.56	23.31	8.13%	21.56	23.31	8.13%	21.56	23.31	8.12%
3	300	28.03	29.96	6.88%	28.03	29.96	6.88%	28.03	29.96	6.89%
4	400	36.61	39.06	6.70%	35.31	37.38	5.84%	35.64	37.80	6.06%
5	500	45.19	48.17	6.59%	42.60	44.79	5.16%	43.24	45.64	5.55%
6	600	53.77	57.27	6.52%	49.88	52.21	4.67%	50.85	53.47	5.15%
7	700	62.34	66.37	6.46%	57.16	59.62	4.31%	58.46	61.31	4.88%
8	800	70.92	75.48	6.42%	64.44	67.04	4.03%	66.06	69.15	4.68%
9	900	79.50	84.58	6.39%	71.72	74.46	3.81%	73.67	76.99	4.51%
10	1,000	88.08	93.68	6.36%	79.01	81.87	3.63%	81.27	84.82	4.37%
11	1,100	96.65	102.78	6.34%	86.29	89.29	3.47%	88.88	92.66	4.25%
12	1,200	105.23	111.89	6.32%	93.57	96.70	3.35%	96.48	100.50	4.17%
13	1,300	113.81	120.99	6.31%	100.85	104.12	3.24%	104.09	108.33	4.07%
14	1,400	122.39	130.09	6.30%	108.13	111.53	3.14%	111.70	116.17	4.00%
15	1,500	130.96	139.19	6.28%	115.42	118.95	3.06%	119.30	124.01	3.95%
16	2,000	173.85	184.71	6.24%	151.82	156.03	2.77%	157.33	163.20	3.73%
17	2,500	216.74	230.22	6.22%	188.23	193.10	2.59%	195.36	202.38	3.59%
18	3,000	259.63	275.73	6.20%	224.64	230.18	2.46%	233.39	241.57	3.50%
19	4,000	345.40	366.76	6.18%	297.46	304.34	2.31%	309.45	319.94	3.39%
20	5,000	431.18	457.78	6.17%	370.28	378.49	2.22%	385.51	398.31	3.32%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Schedule 9, Large General Service - Secondary, Single Phase  
 Summer

Line No	Demand kW	BLC kW	Load Factor	Energy kWh	(1) Current Rate	(2) Proposed Rate	(3) Difference (2) - (1)	(4) Percent Difference
1	10	11	20%	1,440	131.54	152.77	21.23	16.14%
2			35%	2,520	182.20	207.68	25.48	13.98%
3			50%	3,600	232.85	262.59	29.74	12.77%
4			65%	4,680	283.51	317.50	33.99	11.99%
5			80%	5,760	334.17	372.42	38.25	11.45%
6	50	57	20%	7,200	620.71	721.33	100.62	16.21%
7			35%	12,600	873.99	995.90	121.91	13.95%
8			50%	18,000	1,127.27	1,270.46	143.19	12.70%
9			65%	23,400	1,380.55	1,545.02	164.47	11.91%
10			80%	28,800	1,633.84	1,819.59	185.75	11.37%
11	100	114	20%	14,400	1,231.92	1,431.67	199.75	16.21%
12			35%	25,200	1,738.48	1,980.79	242.31	13.94%
13			50%	36,000	2,245.04	2,529.92	284.88	12.69%
14			65%	46,800	2,751.61	3,079.05	327.44	11.90%
15			80%	57,600	3,258.17	3,628.17	370.00	11.36%
16	300	342	20%	43,200	3,676.75	4,273.00	596.25	16.22%
17			35%	75,600	5,196.44	5,920.38	723.94	13.93%
18			50%	108,000	6,716.13	7,567.76	851.63	12.68%
19			65%	140,400	8,235.82	9,215.14	979.32	11.89%
20			80%	172,800	9,755.51	10,862.52	1,107.01	11.35%
21	500	570	20%	72,000	6,121.59	7,114.34	992.75	16.22%
22			35%	126,000	8,654.40	9,859.97	1,205.57	13.93%
23			50%	180,000	11,187.22	12,605.60	1,418.38	12.68%
24			65%	234,000	13,720.04	15,351.23	1,631.19	11.89%
25			80%	288,000	16,252.85	18,096.86	1,844.01	11.35%
26	750	855	20%	108,000	9,177.63	10,666.01	1,488.38	16.22%
27			35%	189,000	12,976.86	14,784.46	1,807.60	13.93%
28			50%	270,000	16,776.08	18,902.90	2,126.82	12.68%
29			65%	351,000	20,575.30	23,021.35	2,446.05	11.89%
30			80%	432,000	24,374.53	27,139.79	2,765.26	11.34%



**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Schedule 9, Large General Service - Secondary, Single Phase  
Non-Summer

<u>Line No</u>	<u>Demand kW</u>	<u>BLC kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	(1) <u>Current Rate</u>	(2) <u>Proposed Rate</u>	(3) <u>Difference 2-1</u>	(4) <u>Percent Difference</u>
1	10	11	20%	1,440	118.13	131.74	13.61	11.52%
2			35%	2,520	164.57	182.13	17.56	10.67%
3			50%	3,600	211.02	232.52	21.50	10.19%
4			65%	4,680	257.46	282.91	25.45	9.89%
5			80%	5,760	303.91	333.30	29.39	9.67%
6	50	57	20%	7,200	553.64	616.19	62.55	11.30%
7			35%	12,600	785.86	868.14	82.28	10.47%
8			50%	18,000	1,018.09	1,120.09	102.00	10.02%
9			65%	23,400	1,250.32	1,372.05	121.73	9.74%
10			80%	28,800	1,482.54	1,624.00	141.46	9.54%
11	100	114	20%	14,400	1,097.77	1,221.38	123.61	11.26%
12			35%	25,200	1,562.23	1,725.28	163.05	10.44%
13			50%	36,000	2,026.68	2,229.19	202.51	9.99%
14			65%	46,800	2,491.13	2,733.09	241.96	9.71%
15			80%	57,600	2,955.59	3,237.00	281.41	9.52%
16	300	342	20%	43,200	3,274.32	3,642.13	367.81	11.23%
17			35%	75,600	4,667.68	5,153.84	486.16	10.42%
18			50%	108,000	6,061.04	6,665.56	604.52	9.97%
19			65%	140,400	7,454.40	8,177.28	722.88	9.70%
20			80%	172,800	8,847.76	9,689.00	841.24	9.51%
21	500	570	20%	72,000	5,450.86	6,062.88	612.02	11.23%
22			35%	126,000	7,773.13	8,582.41	809.28	10.41%
23			50%	180,000	10,095.40	11,101.94	1,006.54	9.97%
24			65%	234,000	12,417.67	13,621.47	1,203.80	9.69%
25			80%	288,000	14,739.94	16,141.00	1,401.06	9.51%
26	750	855	20%	108,000	8,171.54	9,088.81	917.27	11.23%
27			35%	189,000	11,654.95	12,868.11	1,213.16	10.41%
28			50%	270,000	15,138.35	16,647.41	1,509.06	9.97%
29			65%	351,000	18,621.76	20,426.71	1,804.95	9.69%
30			80%	432,000	22,105.16	24,206.01	2,100.85	9.50%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Idaho**  
**General Rate Case**  
**Filed June 1, 2011**

Schedule 9, Large General Service - Secondary  
Weighted Monthly Average

<u>Line No</u>	<u>Demand kW</u>	<u>BLC kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	(1) <u>Current Rate</u>	(2) <u>Proposed Rate</u>	(3) <u>Difference (2) - (1)</u>	(4) <u>Percent Difference</u>
1	10	11	20%	1,440	121.48	137.00	15.52	12.78%
2			35%	2,520	168.98	188.52	19.54	11.56%
3			50%	3,600	216.48	240.04	23.56	10.88%
4			65%	4,680	263.97	291.56	27.59	10.45%
5			80%	5,760	311.48	343.08	31.60	10.15%
6	50	57	20%	7,200	570.41	642.48	72.07	12.63%
7			35%	12,600	807.89	900.08	92.19	11.41%
8			50%	18,000	1,045.39	1,157.68	112.29	10.74%
9			65%	23,400	1,282.88	1,415.29	132.41	10.32%
10			80%	28,800	1,520.37	1,672.90	152.53	10.03%
11	100	114	20%	14,400	1,131.31	1,273.95	142.64	12.61%
12			35%	25,200	1,606.29	1,789.16	182.87	11.38%
13			50%	36,000	2,081.27	2,304.37	223.10	10.72%
14			65%	46,800	2,556.25	2,819.58	263.33	10.30%
15			80%	57,600	3,031.24	3,334.79	303.55	10.01%
16	300	342	20%	43,200	3,374.93	3,799.85	424.92	12.59%
17			35%	75,600	4,799.87	5,345.48	545.61	11.37%
18			50%	108,000	6,224.81	6,891.11	666.30	10.70%
19			65%	140,400	7,649.76	8,436.75	786.99	10.29%
20			80%	172,800	9,074.70	9,982.38	907.68	10.00%
21	500	570	20%	72,000	5,618.54	6,325.75	707.21	12.59%
22			35%	126,000	7,993.45	8,901.80	908.35	11.36%
23			50%	180,000	10,368.36	11,477.86	1,109.50	10.70%
24			65%	234,000	12,743.26	14,053.91	1,310.65	10.29%
25			80%	288,000	15,118.17	16,629.97	1,511.80	10.00%
26	750	855	20%	108,000	8,423.06	9,483.11	1,060.05	12.59%
27			35%	189,000	11,985.43	13,347.20	1,361.77	11.36%
28			50%	270,000	15,547.78	17,211.28	1,663.50	10.70%
29			65%	351,000	19,110.15	21,075.37	1,965.22	10.28%
30			80%	432,000	22,672.50	24,939.46	2,266.96	10.00%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**  
 Schedule 9, Large General Service - Primary  
 Summer

Line No	Demand kW	On-Peak Demand kW	BLC kW	Load Factor	Energy kWh	(1) Current Rate	(2) Proposed Rate	(3) Difference (2) - (1)	(4) Percent Difference
1	400	358	460	40%	115,200	7,637.36	8,290.13	652.78	8.55%
2				50%	144,000	8,853.33	9,541.90	688.57	7.78%
3				60%	172,800	10,069.30	10,793.67	724.37	7.19%
4				70%	201,600	11,285.26	12,045.43	760.17	6.74%
5				80%	230,400	12,501.23	13,297.20	795.96	6.37%
6	500	448	575	40%	144,000	9,496.70	10,310.92	814.22	8.57%
7				50%	180,000	11,016.66	11,875.62	858.97	7.80%
8				60%	216,000	12,536.62	13,440.33	903.71	7.21%
9				70%	252,000	14,056.58	15,005.04	948.46	6.75%
10				80%	288,000	15,576.54	16,569.75	993.20	6.38%
11	600	538	690	40%	172,800	11,356.04	12,331.70	975.66	8.59%
12				50%	216,000	13,179.99	14,209.35	1,029.36	7.81%
13				60%	259,200	15,003.94	16,087.00	1,083.05	7.22%
14				70%	302,400	16,827.90	17,964.65	1,136.75	6.76%
15				80%	345,600	18,651.85	19,842.29	1,190.45	6.38%
16	700	627	805	40%	201,600	13,215.38	14,352.48	1,137.11	8.60%
17				50%	252,000	15,343.32	16,543.07	1,199.75	7.82%
18				60%	302,400	17,471.27	18,733.66	1,262.40	7.23%
19				70%	352,800	19,599.21	20,924.25	1,325.04	6.76%
20				80%	403,200	21,727.16	23,114.84	1,387.69	6.39%
21	800	717	920	40%	230,400	15,074.72	16,373.27	1,298.55	8.61%
22				50%	288,000	17,506.65	18,876.80	1,370.15	7.83%
23				60%	345,600	19,938.59	21,380.33	1,441.74	7.23%
24				70%	403,200	22,370.53	23,883.86	1,513.33	6.76%
25				80%	460,800	24,802.47	26,387.39	1,584.93	6.39%
26	900	806	1,035	40%	259,200	16,934.05	18,394.05	1,460.00	8.62%
27				50%	324,000	19,669.98	21,210.52	1,540.54	7.83%
28				60%	388,800	22,405.91	24,027.00	1,621.08	7.24%
29				70%	453,600	25,141.84	26,843.47	1,701.62	6.77%
30				80%	518,400	27,877.77	29,659.94	1,782.17	6.39%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Schedule 9, Large General Service - Primary  
Non-Summer

<u>Line No</u>	<u>Demand kW</u>	<u>BLC kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	(1) <u>Current Rate</u>	(2) <u>Proposed Rate</u>	(3) <u>Difference 2-1</u>	(4) <u>Percent Difference</u>
1	400	503	40%	115,200	2,427.64	2,627.18	199.54	8.22%
2			50%	144,000	2,427.64	2,627.18	199.54	8.22%
3			60%	172,800	2,427.64	2,627.18	199.54	8.22%
4			70%	201,600	2,427.64	2,627.18	199.54	8.22%
5			80%	230,400	2,427.64	2,627.18	199.54	8.22%
6	500	628	40%	144,000	2,984.55	3,232.23	247.68	8.30%
7			50%	180,000	2,984.55	3,232.23	247.68	8.30%
8			60%	216,000	2,984.55	3,232.23	247.68	8.30%
9			70%	252,000	2,984.55	3,232.23	247.68	8.30%
10			80%	288,000	2,984.55	3,232.23	247.68	8.30%
11	600	754	40%	172,800	3,541.46	3,837.27	295.82	8.35%
12			50%	216,000	3,541.46	3,837.27	295.82	8.35%
13			60%	259,200	3,541.46	3,837.27	295.82	8.35%
14			70%	302,400	3,541.46	3,837.27	295.82	8.35%
15			80%	345,600	3,541.46	3,837.27	295.82	8.35%
16	700	880	40%	201,600	4,098.37	4,442.32	343.95	8.39%
17			50%	252,000	4,098.37	4,442.32	343.95	8.39%
18			60%	302,400	4,098.37	4,442.32	343.95	8.39%
19			70%	352,800	4,098.37	4,442.32	343.95	8.39%
20			80%	403,200	4,098.37	4,442.32	343.95	8.39%
21	800	1,005	40%	230,400	4,655.28	5,047.36	392.09	8.42%
22			50%	288,000	4,655.28	5,047.36	392.09	8.42%
23			60%	345,600	4,655.28	5,047.36	392.09	8.42%
24			70%	403,200	4,655.28	5,047.36	392.09	8.42%
25			80%	460,800	4,655.28	5,047.36	392.09	8.42%
26	900	1,131	40%	259,200	5,212.19	5,652.41	440.22	8.45%
27			50%	324,000	5,212.19	5,652.41	440.22	8.45%
28			60%	388,800	5,212.19	5,652.41	440.22	8.45%
29			70%	453,600	5,212.19	5,652.41	440.22	8.45%
30			80%	518,400	5,212.19	5,652.41	440.22	8.45%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**  
Schedule 9, Large General Service - Primary  
Weighted Monthly Average

<u>Line No</u>	<u>Demand kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	(1) <u>Curr Rate</u>	(2) <u>Proposed Rate</u>	(3) <u>Difference (2) - (1)</u>	(4) <u>Percent Difference</u>
1	400	50%	144,000	3,730.07	4,042.92	312.85	8.39%
2		60%	172,800	4,034.06	4,355.86	321.80	7.98%
3		70%	201,600	4,338.05	4,668.80	330.75	7.62%
4		80%	230,400	4,642.04	4,981.74	339.70	7.32%
5		90%	259,200	4,946.04	5,294.69	348.65	7.05%
6	500	50%	180,000	4,612.59	5,001.90	389.32	8.44%
7		60%	216,000	4,992.58	5,393.08	400.50	8.02%
8		70%	252,000	5,372.57	5,784.25	411.69	7.66%
9		80%	288,000	5,752.56	6,175.43	422.87	7.35%
10		90%	324,000	6,132.55	6,566.61	434.06	7.08%
11	600	50%	216,000	5,495.10	5,960.88	465.78	8.48%
12		60%	259,200	5,951.09	6,430.29	479.20	8.05%
13		70%	302,400	6,407.08	6,899.70	492.63	7.69%
14		80%	345,600	6,863.07	7,369.12	506.05	7.37%
15		90%	388,800	7,319.06	7,838.53	519.47	7.10%
16	700	50%	252,000	6,377.62	6,919.86	542.24	8.50%
17		60%	302,400	6,909.61	7,467.51	557.90	8.07%
18		70%	352,800	7,441.59	8,015.16	573.56	7.71%
19		80%	403,200	7,973.58	8,562.80	589.22	7.39%
20		90%	453,600	8,505.56	9,110.45	604.89	7.11%
21	800	50%	288,000	7,260.14	7,878.84	618.70	8.52%
22		60%	345,600	7,868.12	8,504.72	636.60	8.09%
23		70%	403,200	8,476.11	9,130.61	654.50	7.72%
24		80%	460,800	9,084.09	9,756.49	672.40	7.40%
25		90%	518,400	9,692.07	10,382.37	690.30	7.12%
26	900	50%	324,000	8,142.65	8,837.82	695.17	8.54%
27		60%	388,800	8,826.64	9,541.94	715.30	8.10%
28		70%	453,600	9,510.62	10,246.06	735.44	7.73%
29		80%	518,400	10,194.60	10,950.18	755.57	7.41%
30		90%	583,200	10,878.58	11,654.29	775.71	7.13%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Schedule 19, Large Power Service - Transmission  
Summer

Line No	Demand kW	On-Peak Demand kW	BLC kW	Load Factor	Energy kWh	(1) Current Rate	(2) Proposed Rate	(3) Difference (2) - (1)	(4) Percent Difference
1	1,000	917	1,100	50%	360,000	17,595.58	21,302.64	3,707.06	21.07%
2				60%	432,000	20,164.11	24,268.84	4,104.74	20.36%
3				70%	504,000	22,732.63	27,235.04	4,502.41	19.81%
4				80%	576,000	25,301.16	30,201.24	4,900.09	19.37%
5				90%	648,000	27,869.68	33,167.44	5,297.76	19.01%
6	2,500	2,293	2,750	50%	900,000	43,688.95	52,901.11	9,212.16	21.09%
7				60%	1,080,000	50,110.26	60,316.61	10,206.34	20.37%
8				70%	1,260,000	56,531.58	67,732.11	11,200.53	19.81%
9				80%	1,440,000	62,952.89	75,147.60	12,194.72	19.37%
10				90%	1,620,000	69,374.20	82,563.10	13,188.90	19.01%
11	4,000	3,670	4,399	50%	1,440,000	69,782.32	84,499.57	14,717.25	21.09%
12				60%	1,728,000	80,056.42	96,364.37	16,307.95	20.37%
13				70%	2,016,000	90,330.52	108,229.17	17,898.65	19.81%
14				80%	2,304,000	100,604.62	120,093.97	19,489.35	19.37%
15				90%	2,592,000	110,878.72	131,958.77	21,080.05	19.01%
16	5,500	5,046	6,049	50%	1,980,000	95,875.69	116,098.04	20,222.34	21.09%
17				60%	2,376,000	110,002.58	132,412.14	22,409.55	20.37%
18				70%	2,772,000	124,129.47	148,726.23	24,596.77	19.82%
19				80%	3,168,000	138,256.35	165,040.33	26,783.98	19.37%
20				90%	3,564,000	152,383.24	181,354.43	28,971.19	19.01%
21	7,000	6,422	7,699	50%	2,520,000	121,969.07	147,696.50	25,727.44	21.09%
22				60%	3,024,000	139,948.74	168,459.90	28,511.16	20.37%
23				70%	3,528,000	157,928.41	189,223.30	31,294.88	19.82%
24				80%	4,032,000	175,908.09	209,986.69	34,078.61	19.37%
25				90%	4,536,000	193,887.76	230,750.09	36,862.33	19.01%
26	8,500	7,798	9,349	50%	3,060,000	148,062.44	179,294.97	31,232.53	21.09%
27				60%	3,672,000	169,894.90	204,507.66	34,612.77	20.37%
28				70%	4,284,000	191,727.36	229,720.36	37,993.00	19.82%
29				80%	4,896,000	213,559.82	254,933.06	41,373.24	19.37%
30				90%	5,508,000	235,392.28	280,145.75	44,753.47	19.01%

**Idaho Power Company  
Typical Monthly Billing Comparison  
State of Oregon  
General Rate Case  
Filed July 29, 2011**

Schedule 19, Large Power Service - Transmission  
Non-Summer

Line No	Demand kW	BLC kW	Load Factor	Energy kWh	(1) Current Rate	(2) Proposed Rate	(3) Difference 2-1	(4) Percent Difference
1	1,000	1,171	50%	360,000	16,983.78	20,445.97	3,462.19	20.39%
2			60%	432,000	19,552.30	23,412.17	3,859.87	19.74%
3			70%	504,000	22,120.83	26,378.37	4,257.54	19.25%
4			80%	576,000	24,689.35	29,344.57	4,655.22	18.86%
5			90%	648,000	27,257.88	32,310.77	5,052.89	18.54%
6	2,500	2,926	50%	900,000	42,159.44	50,759.43	8,599.98	20.40%
7			60%	1,080,000	48,580.76	58,174.93	9,594.17	19.75%
8			70%	1,260,000	55,002.07	65,590.43	10,588.36	19.25%
9			80%	1,440,000	61,423.38	73,005.93	11,582.55	18.86%
10			90%	1,620,000	67,844.69	80,421.42	12,576.73	18.54%
11	4,000	4,682	50%	1,440,000	67,335.11	81,072.89	13,737.78	20.40%
12			60%	1,728,000	77,609.21	92,937.68	15,328.47	19.75%
13			70%	2,016,000	87,883.31	104,802.48	16,919.17	19.25%
14			80%	2,304,000	98,157.41	116,667.28	18,509.87	18.86%
15			90%	2,592,000	108,431.51	128,532.08	20,100.57	18.54%
16	5,500	6,438	50%	1,980,000	92,510.78	111,386.34	18,875.57	20.40%
17			60%	2,376,000	106,637.66	127,700.44	21,062.78	19.75%
18			70%	2,772,000	120,764.55	144,014.54	23,249.99	19.25%
19			80%	3,168,000	134,891.44	160,328.64	25,437.20	18.86%
20			90%	3,564,000	149,018.32	176,642.73	27,624.41	18.54%
21	7,000	8,194	50%	2,520,000	117,686.44	141,699.80	24,013.36	20.40%
22			60%	3,024,000	135,666.12	162,463.20	26,797.08	19.75%
23			70%	3,528,000	153,645.79	183,226.59	29,580.80	19.25%
24			80%	4,032,000	171,625.46	203,989.99	32,364.53	18.86%
25			90%	4,536,000	189,605.14	224,753.39	35,148.25	18.54%
26	8,500	9,949	50%	3,060,000	142,862.11	172,013.26	29,151.15	20.41%
27			60%	3,672,000	164,694.57	197,225.95	32,531.38	19.75%
28			70%	4,284,000	186,527.03	222,438.65	35,911.62	19.25%
29			80%	4,896,000	208,359.49	247,651.35	39,291.85	18.86%
30			90%	5,508,000	230,191.95	272,864.04	42,672.09	18.54%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed July 29, 2011**

Schedule 19, Large Power Service - Transmission  
 Weighted Average Monthly

Line No	Demand kW	Load Factor	Energy kWh	(1) Current Rate	(2) Proposed Rate	(3) Difference (2) - (1)	(4) Percent Difference
1	1,000	50%	360,000	17,136.73	20,660.14	3,523.41	20.56%
2		60%	432,000	19,705.25	23,626.34	3,921.09	19.90%
3		70%	504,000	22,273.78	26,592.54	4,318.76	19.39%
4		80%	576,000	24,842.30	29,558.74	4,716.44	18.99%
5		90%	648,000	27,410.83	32,524.94	5,114.11	18.66%
6	2,500	50%	900,000	42,541.82	51,294.85	8,753.03	20.58%
7		60%	1,080,000	48,963.13	58,710.35	9,747.21	19.91%
8		70%	1,260,000	55,384.44	66,125.85	10,741.40	19.39%
9		80%	1,440,000	61,805.76	73,541.35	11,735.59	18.99%
10		90%	1,620,000	68,227.07	80,956.84	12,729.77	18.66%
11	4,000	50%	1,440,000	67,946.91	81,929.56	13,982.64	20.58%
12		60%	1,728,000	78,221.01	93,794.36	15,573.34	19.91%
13		70%	2,016,000	88,495.11	105,659.15	17,164.04	19.40%
14		80%	2,304,000	98,769.21	117,523.95	18,754.74	18.99%
15		90%	2,592,000	109,043.31	129,388.75	20,345.44	18.66%
16	5,500	50%	1,980,000	93,352.00	112,564.27	19,212.26	20.58%
17		60%	2,376,000	107,478.89	128,878.36	21,399.47	19.91%
18		70%	2,772,000	121,605.78	145,192.46	23,586.68	19.40%
19		80%	3,168,000	135,732.67	161,506.56	25,773.89	18.99%
20		90%	3,564,000	149,859.55	177,820.66	27,961.10	18.66%
21	7,000	50%	2,520,000	118,757.10	143,198.97	24,441.88	20.58%
22		60%	3,024,000	136,736.77	163,962.37	27,225.60	19.91%
23		70%	3,528,000	154,716.45	184,725.77	30,009.32	19.40%
24		80%	4,032,000	172,696.12	205,489.17	32,793.05	18.99%
25		90%	4,536,000	190,675.79	226,252.56	35,576.77	18.66%
26	8,500	50%	3,060,000	144,162.19	173,833.68	29,671.49	20.58%
27		60%	3,672,000	165,994.65	199,046.38	33,051.73	19.91%
28		70%	4,284,000	187,827.11	224,259.08	36,431.96	19.40%
29		80%	4,896,000	209,659.57	249,471.77	39,812.20	18.99%
30		90%	5,508,000	231,492.03	274,684.47	43,192.43	18.66%



**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed June 1, 2011**

Schedule 24, Agricultural Irrigation Service - Secondary  
In-Season

<u>Line No</u>	<u>Demand kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	<u>(1) Curr Rate</u>	<u>(2) Proposed Rate</u>	<u>(3) Difference (2) - (1)</u>	<u>(4) Percent Difference</u>
1	10	20%	1,440	\$158.09	\$216.34	\$58.25	36.85%
2		35%	2,520	\$218.83	\$290.99	\$72.16	32.98%
3		50%	3,600	\$279.30	\$364.81	\$85.51	30.62%
4		65%	4,680	\$339.78	\$438.64	\$98.86	29.10%
5		80%	5,760	\$400.25	\$512.46	\$112.21	28.03%
6	50	20%	7,200	\$731.82	\$997.80	\$265.98	36.35%
7		35%	12,600	\$1,034.17	\$1,366.94	\$332.77	32.18%
8		50%	18,000	\$1,336.53	\$1,736.07	\$399.54	29.89%
9		65%	23,400	\$1,638.89	\$2,105.20	\$466.31	28.45%
10		80%	28,800	\$1,941.25	\$2,474.33	\$533.08	27.46%
11	100	20%	14,400	\$1,448.64	\$1,973.61	\$524.97	36.24%
12		35%	25,200	\$2,053.35	\$2,711.88	\$658.53	32.07%
13		50%	36,000	\$2,658.06	\$3,450.15	\$792.09	29.80%
14		65%	46,800	\$3,262.78	\$4,188.41	\$925.63	28.37%
15		80%	57,600	\$3,867.49	\$4,926.68	\$1,059.19	27.39%
16	300	20%	43,200	\$4,315.92	\$5,876.83	\$1,560.91	36.17%
17		35%	75,600	\$6,130.06	\$8,091.63	\$1,961.57	32.00%
18		50%	108,000	\$7,944.20	\$10,306.43	\$2,362.23	29.74%
19		65%	140,400	\$9,758.34	\$12,521.23	\$2,762.89	28.31%
20		80%	172,800	\$11,572.48	\$14,736.03	\$3,163.55	27.34%
21	500	20%	72,000	\$7,183.19	\$9,780.06	\$2,596.87	36.15%
22		35%	126,000	\$10,206.76	\$13,471.39	\$3,264.63	31.98%
23		50%	180,000	\$13,230.33	\$17,162.72	\$3,932.39	29.72%
24		65%	234,000	\$16,253.89	\$20,854.06	\$4,600.17	28.30%
25		80%	288,000	\$19,277.46	\$24,545.39	\$5,267.93	27.33%
26	750	20%	108,000	\$10,767.29	\$14,659.09	3,891.80	36.14%
27		35%	189,000	\$15,302.64	\$20,196.09	4,893.45	31.98%
28		50%	270,000	\$19,837.99	\$25,733.09	5,895.10	29.72%
29		65%	351,000	\$24,373.35	\$31,270.08	6,896.73	28.30%
30		80%	432,000	\$28,908.70	\$36,807.08	7,898.38	27.32%

In-season months include June, July, August, September

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed June 1, 2011**

Schedule 24, Agricultural Irrigation Service - Secondary  
Out-of-Season

<u>Line No</u>	<u>Demand kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	(1) <u>Current Rate</u>	(2) <u>Proposed Rate</u>	(3) <u>Difference 2-1</u>	(4) <u>Percent Difference</u>
1	10	20%	1,440	\$90.75	\$113.05	22.30	24.57%
2		35%	2,520	\$156.57	\$195.22	38.65	24.69%
3		50%	3,600	\$222.38	\$277.38	55.00	24.73%
4		65%	4,680	\$288.19	\$359.55	71.36	24.76%
5		80%	5,760	\$354.01	\$441.72	87.71	24.78%
6	50	20%	7,200	\$441.76	\$551.27	109.51	24.79%
7		35%	12,600	\$770.83	\$962.10	191.27	24.81%
8		50%	18,000	\$1,099.90	\$1,372.92	273.02	24.82%
9		65%	23,400	\$1,428.97	\$1,783.75	354.78	24.83%
10		80%	28,800	\$1,758.04	\$2,194.58	436.54	24.83%
11	100	20%	14,400	\$880.52	\$1,099.04	218.52	24.82%
12		35%	25,200	\$1,538.66	\$1,920.69	382.03	24.83%
13		50%	36,000	\$2,196.80	\$2,742.34	545.54	24.83%
14		65%	46,800	\$2,854.95	\$3,564.00	709.05	24.84%
15		80%	57,600	\$3,513.09	\$4,385.65	872.56	24.84%
16	300	20%	43,200	\$2,635.56	\$3,290.11	654.55	24.84%
17		35%	75,600	\$4,609.99	\$5,755.07	1,145.08	24.84%
18		50%	108,000	\$6,584.41	\$8,220.03	1,635.62	24.84%
19		65%	140,400	\$8,558.84	\$10,684.99	2,126.15	24.84%
20		80%	172,800	\$10,533.26	\$13,149.95	2,616.69	24.84%
21	500	20%	72,000	\$4,390.61	\$5,481.19	1,090.58	24.84%
22		35%	126,000	\$7,681.31	\$9,589.45	1,908.14	24.84%
23		50%	180,000	\$10,972.02	\$13,697.72	2,725.70	24.84%
24		65%	234,000	\$14,262.73	\$17,805.99	3,543.26	24.84%
25		80%	288,000	\$17,553.43	\$21,914.25	4,360.82	24.84%
26	750	20%	108,000	\$6,584.41	\$8,220.03	1,635.62	24.84%
27		35%	189,000	\$11,520.47	\$14,382.43	2,861.96	24.84%
28		50%	270,000	\$16,456.53	\$20,544.83	4,088.30	24.84%
29		65%	351,000	\$21,392.59	\$26,707.23	5,314.64	24.84%
30		80%	432,000	\$26,328.65	\$32,869.63	6,540.98	24.84%

**Idaho Power Company**  
**Typical Monthly Billing Comparison**  
**State of Oregon**  
**General Rate Case**  
**Filed June 1, 2011**

Schedule 24, Agricultural Irrigation Service - Secondary  
 Weighted Average Monthly

<u>Line No</u>	<u>Demand kW</u>	<u>Load Factor</u>	<u>Energy kWh</u>	<u>(1) Curr Rate</u>	<u>(2) Proposed Rate</u>	<u>(3) Difference (2) - (1)</u>	<u>(4) Percent Difference</u>
1	10	20%	1,440	113.20	147.48	34.28	30.29%
2		35%	2,520	177.32	227.14	49.82	28.10%
3		50%	3,600	241.35	306.52	65.17	27.00%
4		65%	4,680	305.39	385.91	80.53	26.37%
5		80%	5,760	369.42	465.30	95.88	25.95%
6	50	20%	7,200	538.45	700.11	161.67	30.02%
7		35%	12,600	858.61	1,097.05	238.44	27.77%
8		50%	18,000	1,178.78	1,493.97	315.19	26.74%
9		65%	23,400	1,498.94	1,890.90	391.96	26.15%
10		80%	28,800	1,819.11	2,287.83	468.72	25.77%
11	100	20%	14,400	1,069.89	1,390.56	320.67	29.97%
12		35%	25,200	1,710.22	2,184.42	474.20	27.73%
13		50%	36,000	2,350.55	2,978.28	627.72	26.71%
14		65%	46,800	2,990.89	3,772.14	781.24	26.12%
15		80%	57,600	3,631.22	4,565.99	934.77	25.74%
16	300	20%	43,200	3,195.68	4,152.35	956.67	29.94%
17		35%	75,600	5,116.68	6,533.92	1,417.24	27.70%
18		50%	108,000	7,037.67	8,915.50	1,877.82	26.68%
19		65%	140,400	8,958.67	11,297.07	2,338.40	26.10%
20		80%	172,800	10,879.67	13,678.64	2,798.98	25.73%
21	500	20%	72,000	5,321.47	6,914.15	1,592.68	29.93%
22		35%	126,000	8,523.13	10,883.43	2,360.30	27.69%
23		50%	180,000	11,724.79	14,852.72	3,127.93	26.68%
24		65%	234,000	14,926.45	18,822.01	3,895.56	26.10%
25		80%	288,000	18,128.11	22,791.30	4,663.19	25.72%
26	750	20%	108,000	7,978.70	10,366.38	2,387.68	29.93%
27		35%	189,000	12,781.19	16,320.32	3,539.12	27.69%
28		50%	270,000	17,583.68	22,274.25	4,690.57	26.68%
29		65%	351,000	22,386.18	28,228.18	5,842.00	26.10%
30		80%	432,000	27,188.67	34,182.11	6,993.45	25.72%