

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UE 213

In the Matter of)
) CUB’S PROPOSED INFORMATION
) REQUESTS
IDAHO POWER Request for a General)
Rate Revision.)
_____)

I. INTRODUCTION

Pursuant to the schedule adopted in this proceeding, the Citizens’ Utility Board of Oregon (“CUB”) submits its proposed information requests. Idaho Power’s UE 213 filing lacks testimony and exhibits which should have been included with its original filing in order to enable a complete review of the case. In order to create a more comprehensive evidentiary record, CUB requests that the presiding Administrative Law Judges order Idaho Power to provide supplemental testimony and exhibits on the items listed in this information request.

CUB respectfully requests that the ALJ ruling include clarification that Idaho Power is required to adhere to the data response time frames as outlined in the prehearing conference memo with the understanding that supplemental testimony is not a substitute for data responses, and that data responses are not a substitute for the requested testimony.

II. PROPOSED INFORMATION REQUESTS

CUB respectfully requests that Idaho Power Company be ordered to produce the following:

- A. An elaboration of the Company's rationale in adopting a seasonal rate structure for residential customers;**
- B. An elaboration and justification of the disparity between summer rate level increases for residential and irrigation customers; and**
- C. An elaboration and justification of the relationship between the new seasonal residential rate structure and residential equal-pay plans**

III. CONCLUSION

For the foregoing reasons, CUB respectfully requests that Idaho Power be required to provide the requested information. CUB also requests that the ALJs' ruling clarify that supplemental testimony does not release Idaho Power from their data response obligations.

Dated this 14th day of September, 2009

Respectfully submitted,



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UE 213 – CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of September, 2009, I served the foregoing **PROPOSED INFORMATION REQUESTS OF THE CITIZENS' UTILITY BOARD OF OREGON** in docket UE 213 upon each party listed in the UE 213 OPUC Service List by email and, where paper service is not waived, by U.S. mail, postage prepaid, and upon the Commission by email and by sending 2 copies by U.S. mail, postage prepaid, to the Commission's Salem offices.

(W denotes waiver of paper service)

(C denotes service of Confidential material authorized)

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