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Attorneys for the Oregon Industrial Customers of Idaho Power

BEFORE THE
OREGON PUBLIC UTILITY COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S REQUEST FOR A GENERAL)
RATE REVISION)

UE 213

PROPOSED INFORMATION
REQUEST FOR IDAHO POWER
COMPANY'S SUPPLEMENTAL
TESTIMONY

Pursuant to Administrative Law Judge Lisa Hardie's Corrected Prehearing Conference Report filed August 25, 2009, Intervenors Oregon Industrial Customers of Idaho Power ("OICIP") file Proposed Information Requests for Idaho Power Company's Supplemental Testimony.

OICIP requests supplemental testimony on the feasibility and cost savings of a virtual peaking or distributed generation program that utilizes standby generators of Idaho Power Company's customers to meet peak system capacity requirements. *See Idaho Power 2008 Integrated Resource Plan UPDATE*, at p. 5 (June 2008) (available at: <http://www.puc.idaho.gov/internet/cases/elec/IPC/IPCE0624/200806202008%20IRP%20UPDATE.PDF>) (noting that after

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“in-depth analysis of the interconnection costs, targeting generators of different sizes, ages, and locations” the Company concluded that it “may be economical to operate customers’ generators during short periods of high energy demand”).

DATED this 10th day of September, 2009.

Richardson & O’Leary, LLP

By /s/ _____

Peter J. Richardson

Oregon Industrial Customers of Idaho Power

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of September, 2009, a true and correct copy of the within and foregoing **PROPOSED INFORMATION REQUEST FOR IDAHO POWER COMPANY'S SUPPLEMENTAL TESTIMONY** were served in the manner shown to:

G. Catriona McCracken
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Signed


Nina M. Curtis



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RECEIVED

SEP 14 2009

Public Utility Commission of Oregon
Administrative Hearing Division

10 September 2009

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Re: Oregon Industrial Customers of Idaho Power UE 213 Data Requests 1-5

Please provide responses to the following requests to Peter Richardson at:
Peter@richardsonandoleary.com.

Please provide responses electronically only, and in the original electronic format.

1. Please provide the responses to Staff's Data Requests 1-107.
2. Please provide the responses to the Citizens Utility Board of Oregon's Data Requests 3-20.
3. Please provide Timothy Tatum's Exhibits 801, 802, 803, and 804 in electronic format.
4. Please provide Darlene Nemnich's Exhibits 1001 and 1002 in electronic format.
5. Please provide Idaho Power Company's 2004 Marginal Cost Study filed in UE 167.

Thank you for your prompt attention to these requests.

Sincerely yours,

/s/
Peter Richardson
RICHARDSON & O'LEARY PLLC

DOCKETED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of September, 2009, a true and correct copy of the within and foregoing **OREGON INDUSTRIAL CUSTOMERS OF IDAHO DATA REQUESTS 1-5 TO IDAHO POWER COMPANY** were served in the manner shown to:

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