

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

March 20, 2014

Attention: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
P.O. Box 2148
Salem, Oregon 97308-2148

Re: AR 578 – Rulemaking Regarding Due Dates For Certain Energy Utility Reports

Dear Sir or Madam:

Idaho Power Company (“Idaho Power” or “Company”) appreciates the opportunity to provide comments on the proposed changes to the Public Utility Commission of Oregon administrative rules relating to the due dates for certain energy utility reports. The proposed rulemaking changes affect set due dates for energy utilities to file their Budget of Expenditures, Construction Budget, Results of Operations, and Annual Reports such as the FERC 1 as required in OAR 860-027-0005, -0015, -0045, and -0070. Idaho Power welcomes changes to the aforementioned administrative rules that will allow utilities to timely comply, recognizing that the data required for the reports is often not finalized until after the current due dates.

Budget Filings – OAR 860-027-0005 and 860-027-0015

OAR 860-027-0005 and 860-027-0015 require the annual filing of budget reports. OAR 860-027-0005 states that “Each energy utility operating within Oregon and having gross operating revenues of \$50,000 or more per annum is required to file with the Commission on or before the first day of November of each year, a copy of its proposed Budget of Expenditures, on forms approved by the Commission.” OAR 860-027-0015 establishes a December 31 filing date for the New Construction Budget stating, “Each energy utility operating within Oregon is required to file annually on or before December 31 on forms approved by the Commission information on new construction, extensions, and additions to the utility’s property.” The proposed rules would remove the November and December 31 filing dates, but require the utility to notify the Commission in writing, by December 1 each year, of the date the energy utility will file each report.

Both the Budget of Expenditures and New Construction Budget are based on Idaho Power’s annual capital budget that is approved by the Board of Directors during their mid-January meeting of the budget year. Idaho Power has routinely asked the Commission for, and has been granted, an extension of these reporting deadlines to March 15 of the budget year. In fact, in 2013, six utilities requested a waiver of OAR 860-027-0005 and/or OAR 860-027-0015 for the 2014 budget year. All but one of the utilities asked for a filing date of these budget reports on or after February 14, 2014, clearly indicating the need for a change to the reporting dates of the current rules.

However, the proposed rules do not relieve the burden on utilities of requesting an extension of the report due dates or relieve the Commission Staff of the burden of reviewing and granting extensions; the proposal simply sets a date for when a utility must notify the

Commission of the date they will file their budget reports. Instead, the Company proposes the following language to set filing dates that would allow the majority of the utilities to meet the requirement of the rules and limit the amount of extensions requested each year. By setting an obtainable date, notifications to the Commission by the utilities would be greatly reduced and possibly eliminated because the utilities will be able to make timely filings of the Budget of Expenditures and New Construction Budget reports. The following is Idaho Power's proposal:

OAR 860-027-0005

Utilities Required to File Reports

Each energy utility operating within Oregon and having gross operating revenues of \$50,000 or more per annum is required to file with the Commission on or before **March 15** of each year, a copy of its proposed Budget of Expenditures, on forms approved by the Commission.

OAR 860-027-0015

New Construction Budget

Each energy utility operating within Oregon is required to file annually on or before **March 15** of each year on forms approved by the Commission information on new construction, extensions, and additions of the utility's property.

Uniform System of Accounts – OAR 860-027-0045 & Annual Reports – OAR 860-027-0070

Idaho Power agrees with the proposed revisions to rules OAR 860-027-0045 and 860-027-0070. These rules apply to the Company's filing of its Results of Operations and FERC 1 report, respectively. Historically, the Company has been unable to meet the April filing requirement of both reports because financial data is not yet available in time and Idaho Power would request an extension. The preparation of the FERC 1 cannot begin until the Company's year-end financial data is finalized and audited. Once the financial data is available, Idaho Power begins preparation of the FERC 1. When it is completed, it is filed with the Federal Energy Regulatory Commission by April 15 of each year. Subsequently, the FERC 1 is filed with the Commission after the April 1 filing requirement of OAR 860-027-0070. The proposed rule changes would eliminate the need for an extension and allow Idaho Power to comply with the filing date of both Results of Operations and FERC 1 reports.

Thank you for the opportunity to provide comments in this matter. If you have any questions regarding this filing, please call Senior Regulatory Analyst, Courtney Waites at (208) 388-5612.

Sincerely,



Lisa D. Nordstrom

LDN:kkt

cc: Service List

CERTIFICATE OF SERVICE

AR 578

I hereby certify that on March 20, 2014, I served a true and correct copy of IDAHO POWER COMPANY'S COMMENTS on the parties in Docket AR 578 by e-mail to said person(s) as indicated below.

Edward Finklea, Executive Director
326 Fifth Street
Lake Oswego, Oregon 97034
efinklea@nwigu.org

Kelly O. Norwood
Vice President – State & Federal Regulation
Avista Utilities
P.O. Box 3727
Spokane, Washington 99220-3727
kelly.norwood@avistacorp.com

Michael Parvinen
Manager – Regulatory Affairs & Gas Supply
Cascade Natural Gas
8113 West Grandridge Boulevard
Kennewick, Washington 99336
michael.parvinen@cngc.com

OPUC Dockets
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, Oregon 97205
dockets@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, Oregon 97205
bob@oregoncub.org

G. Catriona McCracken
Citizens' Utility Board of Oregon
610 SW Broadway, Suite 400
Portland, Oregon 97205
catriona@oregoncub.org

Melinda J. Davison
DAVISON VAN CLEVE, PC
333 SW Taylor, Suite 400
Portland, Oregon 97204
mjd@dvclaw.com

Onita King
Northwest Natural
220 NW 2nd Avenue
Portland, Oregon 97209-3991
ork@nwnatural.com

Mark R. Thompson
Northwest Natural
220 NW 2nd Avenue
Portland, Oregon 97209
mark.thompson@nwnatural.com

R. Bryce Dalley
Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
bryce.dalley@pacificcorp.com

Ariel Son
Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232
ariel.son@pacificcorp.com

Patrick Hager
Rates & Regulatory Affairs
Portland General Electric Company
121 SW Salmon Street - IWTC1711
Portland, Oregon 97204
pge.opuc.filings@pgn.com

Jay Tinker
Portland General Electric Company
121 SW Salmon Street – 1WTC-0702
Portland, Oregon 97204
pge.opuc.filings@pgn.com

DATED: March 20, 2014.



Kimberly Towell, Executive Assistant