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May 15, 2017

VIA ELECTRONIC MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

Re: **AR 600/UM 1776 – Comments on Staff Report**

Attention Filing Center:

Idaho Power Company (Idaho Power or Company) appreciates this opportunity to provide comments in response to the proposal made by Staff of the Public Utility Commission of Oregon (Commission) in its May 8, 2017 memorandum regarding the scope of UM 1776 and AR 600. In that memorandum, Staff has proposed that the Commission decline to open the scope of these dockets to all issues raised by the parties, and has recommended instead that the Commission restrict the scope of these dockets to the investigation of certain specific categories of issues.

The Commission's policies governing competitive bidding have been carefully crafted, revisited and updated by the Commission over the past thirteen years with the active involvement of all stakeholder groups. The resulting guidelines provide for a reasonable and fair process that does not pre-judge the outcome of the competitive bidding process and that allows for diversity in ownership. Therefore, Idaho Power believes that the current rules fulfill the goals for competitive bidding articulated by the Legislature and by this Commission and that changes are not required. Moreover, the Commission last adopted substantive changes to the rules in Order 14-149, and there have been no requests for proposals issued under these new rules. Therefore, arguments that the current rules are insufficient or produce skewed results are not credible. Accordingly, Idaho Power believes it would be appropriate for the Commission to confirm that the current policies allow for diverse ownership, and to proceed to convert the current guidelines to rules, as required by SB 1547.

That said, Idaho Power acknowledges that the Commission may wish to take this opportunity to review specific and discrete aspects of the Commission's competitive bidding policies to determine whether limited changes may be appropriate. For this reason, Idaho Power does not oppose Staff's recommendation. However, Idaho Power cautions the

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Commission against revisiting recently-litigated issues or significantly revising the current rules, when the parties have not yet had the opportunity to observe their application.

Idaho Power disagrees with the arguments made by the Northwest and Intermountain Power Producers Coalition (NPPC) in their comments filed on May 10, 2017. PacifiCorp d/b/a Pacific Power filed a comprehensive rebuttal of NPPC's arguments on May 12, 2017. Idaho Power agrees with the points made in PacifiCorp's comments, and urges the Commission to reject NPPC's arguments and proposals.

Very truly yours,

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

Lisa Rackner