

ELLEN F. ROSENBLUM
Attorney General



MARY H. WILLIAMS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

October 11, 2012

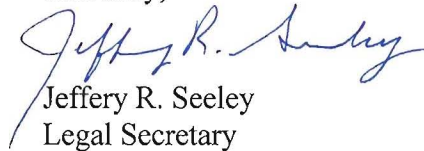
VIA EMAIL AND U.S. MAIL

Attention: Filing Center
Public Utility Commission of Oregon
550 Capitol Street NE, #215
PO Box 2148
Salem, OR 97308-2148
puc.filingcenter@state.or.us

Re: *In the Matter of IDAHO POWER COMPANY Request for General Rate Revision*
PUC Docket No.: UE 233
DOJ File No.: 860115-GB0563-11

Enclosed for filing are an original and one copy of Staff Motion to Admit Pre-Filed Exhibits in the above-captioned docket for filing with the PUC today.

Sincerely,



Jeffery R. Seeley
Legal Secretary
Natural Resources/Business Activities Sections

Enclosures
JRS:jrs/#3682837
c: UE 233 Service List

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UE 233**

4 In the Matter of

5 **IDAHO POWER COMPANY**

6 Request for a general rate revision

7
8 **STAFF MOTION TO ADMIT PRE-FILED**
9 **EXHIBITS**

8 Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law
9 Judge to admit the following pre-filed exhibits into the record. This motion is supported by the
10 affidavit of Staff witness Erick Colville attesting to the truthfulness of the exhibits. (Att.)

11 Exhibit No.	Description
12 Staff/1000	Staff response testimony of Erik Colville
13 Staff/1001	Staff March 7, 2012 Jim Bridger NPV comparison with replacement resource
14 Staff/1100	Staff testimony of Erik Colville
15 Staff/1101	Timeline re: Bridger Unit 3
16 Staff/1200	Staff testimony of Erik Colville re: Bridger Power Plant (Unit 3)
17 Staff/1201	Staff supplemental response to some of CUB's issues
18 Staff/1202	Staff comparison of capital cost estimates used in decision-making process and modified capital cost estimates

19
20 DATED this 11th day of October 2012.

21 Respectfully submitted,

22 ELLEN F. ROSENBLUM
23 Attorney General

24 

25 Stephanie S. Andrus, #92512
26 Senior Assistant Attorney General
Of Attorneys for Staff of the Public Utility
Commission of Oregon

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UE 233**

4
5 In the Matter of
6 IDAHO POWER COMPANY
7 Request for a General Rate Revision.
8 State of Oregon)
9 County of Marion) ss.

AFFIDAVIT OF ERIK COLVILLE

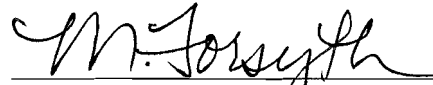
10 I, ERIK COLVILLE, hereby depose and say:

- 11 1. I am employed as a Utility Analyst 3 in the Electric Rates and Planning Section of the
12 Electric and Natural Gas Division of the Public Utility Commission of Oregon.
- 13 2. In the course of my employment, I drafted three rounds of testimony in support of Staff's
14 position in Phase II of this case, pre-filed as Staff Exhibit 1000, 1100, and 1200. I also
15 filed four exhibits in support of my testimony, labeled Staff Exhibits 1001, 1101, 1201,
16 and 1202.
- 17 3. I attest that, to the best of my knowledge, the testimony in pre-filed Staff Exhibits 1000,
18 1100, and 1200, and the analysis and statements in Staff Exhibits 1001, 1101, 1201, and
19 1202 are true and accurate.

20 
21 ERIK COLVILLE

22 SUBSCRIBED AND SWORN to before me this 10 day of October, 2012.



25 
26 Notary Public for Oregon
My Commission Expires: 7-20-15

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2012, I served the foregoing STAFF MOTION TO ADMIT PRE-FILED EXHIBITS upon the persons named on the service list below who have waived such service by mail, by serving a full, true and correct copy thereof at their e-mail address as follows:

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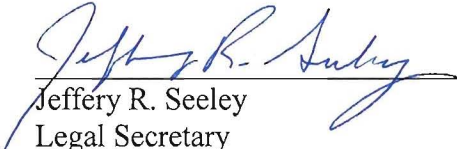
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(C)= Confidential (HC)= Highly Confidential



Jeffery R. Seeley
Legal Secretary
Natural Resources/Business Activities Sections