

# McDowell & Rackner PC



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July 10, 2009

## VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
PO Box 2148  
Salem, OR 97308-2148

**Re: Docket UM 1396**

Enclosed for filing in the above-identified docket are an original and five copies of Idaho Power Company's Opening Brief.

A copy of this document is being served upon all parties in this proceeding as indicated on the enclosed service list.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo

Enclosure

cc: Service List

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**CERTIFICATE OF SERVICE**


I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1396 on the following named person(s) on the date indicated below by email and first-class mail addressed to said person(s) at his or her last-known address(es) indicated below.

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DATED: July 10, 2009

  
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Wendy McIndoo  
Legal Assistant



1 Idaho Power agrees with the Commission on both counts. The Company agrees  
2 that accounting for a utility's resource position will generally produce a more accurate  
3 avoided cost calculation. *And*, the Company agrees that given Idaho Power's specific  
4 resource position, and given the fact that the Idaho Public Utility Commission has ordered  
5 the Company to use the SAR method without differentiating between resource positions, it's  
6 appropriate to continue to allow the Company to do so in Oregon, as well.

7 However, as Idaho Power's resource position changes, the Company foresees that it  
8 may determine that it is appropriate for it to distinguish between resource sufficiency and  
9 insufficiency in modeling its avoided costs—in both Idaho and Oregon. The Company  
10 therefore wishes to reserve the right to request that it be allowed to do so, at some time in  
11 the future. In such a case, the Company agrees with the approaches articulated by the  
12 Portland General Electric Company and Pacific Power and Light.

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14 DATED: July 10 2009

McDOWELL & RACKNER PC

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Lisa F. Rackner

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