

**LISA D. NORDSTROM**  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

December 18, 2023

**VIA ENCRYPTED ELECTRONIC MAIL**

Public Utility Commission of Oregon  
Filing Center  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97301

Re: Docket UM 1464(14)  
In the Matter of Idaho Power Company's Deferred Accounting of Net Variable Power  
Cost Variances – Idaho Power Company's Application for Reauthorization

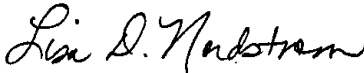
Attention Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Application for Reauthorization. Attachment B is confidential and is being provided confidentially pursuant to OAR 860-001-0070 and Protective Order No. 12-499 previously issued in this docket.

Confidential Attachment B to the Application contains customer information or commercially sensitive, potentially material non-public information under Regulation FD and is being provided to the Public Utility Commission of Oregon's Filing Center pursuant to OAR 860-001-0070, under a separate encrypted email. The Application and Notice have been served on the parties in Docket Nos. UM 1464 and UE 233, Idaho Power Company's last general rate case.

Please contact me at (208) 388-5825 or Regulatory Consultant Courtney Waites at (208) 388-5612 with any questions regarding this filing.

Very truly yours,



Lisa D. Nordstrom

LDN/sg  
Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM 1464(14)

In the Matter of Idaho Power Company's  
Application for Deferred Accounting of Net  
Variable Power Cost Variances

APPLICATION FOR  
REAUTHORIZATION

**I. INTRODUCTION**

Pursuant to ORS 757.210, ORS 757.259, and OAR 860-027-0300, Idaho Power Company ("Idaho Power") hereby requests an accounting order reauthorizing Idaho Power to defer for later ratemaking treatment annual net variable power cost variances pursuant to Order No. 08-238 and Idaho Power Tariff Schedule 56. Schedule 56 is an "automatic adjustment clause" as defined in ORS 757.210. Idaho Power seeks authorization for this deferral effective as of January 1, 2024. In support of this Application, Idaho Power states:

1. Idaho Power is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Public Utility Commission of Oregon ("Commission").
2. This Application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize the deferral of certain items for later inclusion in rates.
3. Communications regarding this Application should be addressed to:

Lisa Nordstrom  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

Courtney Waites  
Idaho Power Company  
P.O. Box 70  
Boise, ID 83707  
[cwaites@idahopower.com](mailto:cwaites@idahopower.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**II. OAR 860-027-0300(3) REQUIREMENTS**

**A. Description**

With this deferral application, Idaho Power seeks reauthorization from the Commission to accrue, for future amortization, the difference between actual annual net variable power costs and the annual net variable power costs recovered pursuant to Tariff Schedule 55, in accordance with Order No. 08-238. The annual variance will be determined pursuant to the terms of Schedule 56, which includes a Power Supply Expense Deadband and Earnings Test. This annual power cost accrual may also include any variances in the revenues received, and incremental operations and maintenance costs incurred associated with the Company’s participation in the Energy Imbalance Market (“EIM”). The operations and maintenance costs will be tracked similar to the annual net variable power costs with the annual variance determined pursuant to the terms of Schedule 56, which includes a Power Supply Expense Deadband and an Earnings Test.

**B. Reasons for Deferral**

In Order No. 08-238, the Commission ordered the adoption of a power cost adjustment mechanism for Idaho Power that contains both an Annual Power Cost Update (“APCU”) and Power Cost Adjustment Mechanism (“PCAM”). Idaho Power Schedule 55 contains the terms of the APCU while Schedule 56 contains the terms of the PCAM. The PCAM provides for recognition in rates of the difference, for a given year, between the *actual* annual net variable power costs incurred by Idaho Power and the net annual variable power costs recovered pursuant to Idaho Power Schedule 55. This deferral is intended to capture the net annual variable power cost difference that will be amortized in rates and is filed pursuant to Order No. 08-238 and ORS 757.259(2)(e). In addition, this deferral will minimize the frequency of rate changes or the fluctuation of rate levels and match appropriately the costs borne by and benefits received by customers.

//

1           **C.     Proposed Accounting**

2           Idaho Power records revenues and expenses associated with net annual variable  
3 power costs that would be subject to the deferral order in accordance with the Code of  
4 Federal Regulations (“CFR”) to the Federal Energy Regulatory Commission (“FERC”)  
5 Account 501 (Fuel), FERC Account 547 (Fuel), FERC Account 447 (Sales for Resale), and  
6 FERC 555 (Purchased Power). Upon receiving approval of a deferral, Idaho Power proposes  
7 to record the deferred amount by debiting FERC Account 182.3 (Regulatory Assets) and  
8 crediting FERC Account 557 (Other Expenses) if there is an amount to collect from  
9 customers. If there is a refund to customers, Idaho Power would record the accrued amount  
10 in FERC Account 254 (Regulatory Liabilities) and debit FERC Account 557 (Other  
11 Expenses).

12           Incremental EIM costs that would be subject to the deferral are recorded in accordance  
13 with the CFR in numerous FERC accounts as these costs include ongoing operations and  
14 maintenance expenses. Idaho Power proposes to record the deferred amount by debiting  
15 FERC Account 182.3 (Regulatory Assets) and crediting FERC Account 407.4 (Regulatory  
16 Credits) if there is an amount to collect from customers. If there is a refund to customers,  
17 Idaho Power would record the accrued amount in FERC Account 254 (Regulatory Liabilities)  
18 and debit FERC Account 407.3 (Regulatory Debits).

19           **D.     Estimate of Amounts**

20           The deferred amount is a function of several unknown and unpredictable factors  
21 including customer usage, the wholesale market price for electricity, and the wholesale  
22 market price for natural gas. Because the deferred amount is dependent on factors that  
23 cannot be precisely forecast, Idaho Power cannot provide an estimate of the deferred  
24 amount. Idaho Power requests that, in accordance with Order No. 05-1070, it be allowed to  
25 accrue interest on the unamortized balance at a rate equal to its authorized weighted average  
26 cost of capital most recently approved by the Commission.

1           **E. Notice**

2           A copy of the Notice of Application for Deferred Accounting of Excess Power Costs  
3 and a list of persons served with the Notice are attached to the Application as Attachment A.

4                                   **III. OAR 860-027-0300(4) REQUIREMENTS**

5           **A. Entries in the Deferred Account to Date**

6           Attached to the Application as Confidential Attachment B is a description and  
7 explanation of the entries in this deferred account as of the date of the Application. As can  
8 be seen in the attachment, 2022 PCAM amounts and 2023 PCAM amounts fell outside the  
9 deadbands, resulting in amounts recorded in the deferred account.

10           **B. Reason for Continuation of Deferred Accounting**

11           As discussed in detail above, this deferral is intended to capture the net annual  
12 variable power cost difference that will be amortized in rates and is authorized pursuant to  
13 Order No. 08-238.

14                                   **IV. CONCLUSION**

15           Deferred accounting treatment is an appropriate, just, and reasonable means of  
16 implementing Order No. 08-238 and Idaho Power Schedule 56.

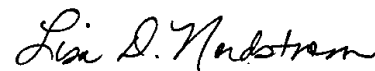
17           For the reasons stated above, Idaho Power requests permission to defer annual net  
18 variable power cost variances beginning January 1, 2024, pursuant to Order No. 08-238 and  
19 Idaho Power Schedule 56.

20

21   DATED: December 18, 2023

IDAHO POWER COMPANY

22



23

---

LISA D. NORDSTROM  
Attorney for Idaho Power Company

24

25

26

1 **CERTIFICATE OF SERVICE**

2 **UM 1464(14)**

3 I hereby certify that on December 18, 2023, I served a true and correct copy of Idaho  
4 Power Company's Application for Reauthorization on the parties in Dockets UM 1464 and  
5 UE 233 by e-mail to said person(s) as indicated below.

6 OPUC Dockets  
Citizens' Utility Board of Oregon  
7 [dockets@oregoncub.org](mailto:dockets@oregoncub.org)

Robert Jenks  
Citizens' Utility Board of Oregon  
8 [bob@oregoncub.org](mailto:bob@oregoncub.org)

9 Kathy Zarate  
Public Utility Commission of Oregon  
[kathy.zarate@puc.oregon.gov](mailto:kathy.zarate@puc.oregon.gov)

Stephanie S. Andrus  
Department of Justice  
[stephanie.andrus@state.or.us](mailto:stephanie.andrus@state.or.us)

10 Dr. Don Reading  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

Mitch Moore  
Public Utility Commission of Oregon  
[mitch.moore@puc.oregon.gov](mailto:mitch.moore@puc.oregon.gov)

12 John W. Stephens  
Esler Stephens & Buckley  
13 [stephens@eslerstephens.com](mailto:stephens@eslerstephens.com)

Gregory M. Adams  
Richardson Adams, PLLC  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

14 Peter J. Richardson  
Richardson Adams, PLLC  
15 [peter@richardsonadams.com](mailto:peter@richardsonadams.com)

Joshua D. Johnson  
Attorney at Law  
[jdj@racinelaw.net](mailto:jdj@racinelaw.net)

16 Renewable Northwest Project  
17 [dockets@renewablenw.org](mailto:dockets@renewablenw.org)

Anthony J. Yankel  
Utility Net, Inc.  
[tony@yankel.net](mailto:tony@yankel.net)

18 Randy Dahlgren  
Portland General Electric Company  
19 [pge.opuc.filings@pgn.com](mailto:pge.opuc.filings@pgn.com)

Sommer Moser  
Oregon Department of Justice  
[sommer.moser@doj.state.or.us](mailto:sommer.moser@doj.state.or.us)

20 Irion A. Sanger  
Sanger Law PC  
21 [irion@sanger-law.com](mailto:irion@sanger-law.com)

Etta Lockey  
Pacific Power  
[etta.lockey@pacificcorp.com](mailto:etta.lockey@pacificcorp.com)

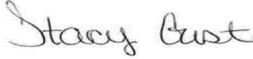
22 Lisa Rackner  
McDowell Rackner & Gibson PC  
23 [dockets@mrg-law.com](mailto:dockets@mrg-law.com)

Donald W. Schoenbeck  
Regulatory & Cogeneration Services, Inc.  
24 [dws@r-c-s-inc.com](mailto:dws@r-c-s-inc.com)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Oregon Dockets  
PacifiCorp, d/b/a Pacific Power  
[oregondockets@pacificcorp.com](mailto:oregondockets@pacificcorp.com)

DATED: December 18, 2023



---

Stacy Gust, Regulatory Administrative Assistant

## **Attachment A**



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
**UM 1464(14)**

In the Matter of Idaho Power Company's  
Application for Deferred Accounting of Net  
Variable Power Cost Variances

**NOTICE OF APPLICATION FOR  
DEFERRED ACCOUNTING OF NET  
VARIABLE POWER COST VARIANCES**

On December 18, 2023, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an Order authorizing deferral of the annual net variable power cost variance pursuant to Order No. 08-238 and Idaho Power Tariff Schedule 56.

Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.


Idaho Power's Application will be posted on the Commission website for persons who wish to obtain a copy or they may contact the following:

Lisa D. Nordstrom  
Idaho Power Company  
1221 West Idaho Street  
P.O. Box 70  
Boise, ID 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

/////  
/////  
/////  
/////  
/////  
/////

1 Any person who wishes to submit written comments to the Commission on Idaho  
2 Power's Application must do so by no later than January 18, 2024.

3  
4 DATED: December 18, 2023

5 

6 

---

Lisa D. Nordstrom  
7 Attorney for Idaho Power Company

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

# **Attachment B**

**CONFIDENTIAL**

**SUBJECT TO PROTECTIVE AGREEMENT NO. 12-499**