

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

3 UE 301

4 In the Matter of
5
6 IDAHO POWER COMPANY,
7 2016 Annual Power Cost Update.

STAFF'S MOTION TO ENTER
SELECTED STAFF EXHIBITS

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9 Staff recently learned that its Exhibits Staff/201, 202, 203 and 204, while
10 referenced and discussed in Mr. Gibbens testimony (*see* Staff/200), were inadvertently not
11 submitted with the submission of Staff/200. Staff includes those Exhibits with this Motion and
12 asks that each be admitted into the record.

13 DATED this 2nd day of June, 2016.

14 Respectfully submitted,

15 ELLEN F. ROSENBLUM
16 Attorney General

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18 Michael T. Weirich, #82425
19 Assistant Attorney General
20 Of Attorneys for Staff of the Public Utility
21 Commission of Oregon
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CASE: UE 301
WITNESS: SCOTT GIBBENS

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 201

**Exhibits in Support
Of Testimony
(March Forecast)**

May 20, 2016

STAFF'S DATA REQUEST NO. 20:

Please provide the following information regarding O&M:

- a. **Please give a detailed description of the purpose and makeup of the oil and handling component.**
- b. **Please describe why these components and uses do not correlate with power generation at a plant.**
- c. **Please provide a narrative description as to why Boardman has such a small O&M cost relative Idaho Power's other thermal plants.**
- d. **Are there any fixed costs similar in nature to O&M for natural gas fired plants?**

IDAHO POWER COMPANY'S RESPONSE TO STAFF'S DATA REQUEST NO. 20:

- a. The oil component is the diesel oil burned at the plant for startup and flame stabilization. The handling component is the cost to move the coal from the train trestle (or additionally, when the coal is on the plant site at Bridger from the mine) to the coal silos in the plant. Included in the handling costs are the operating expenses for conveyors, heavy equipment, heavy equipment fuel, and labor.
- b. These components are based on total plant charges for the handling and storage of the coal, and are not specific to the generation Idaho Power receives from the plant.
- c. Because total O&M costs are assigned based on capacity ownership percentage, and Idaho Power's ownership share at Boardman is smaller relative to the other jointly owned coal plants, the O&M costs related to Boardman are lower in comparison to the other plants.
- d. Yes. As discussed on page 8 of Idaho Power/100, the Company has historically included the cost of natural gas pipeline capacity reservations as a fixed cost input to the APCU which is not included as a dispatch cost component within the AURORA model.

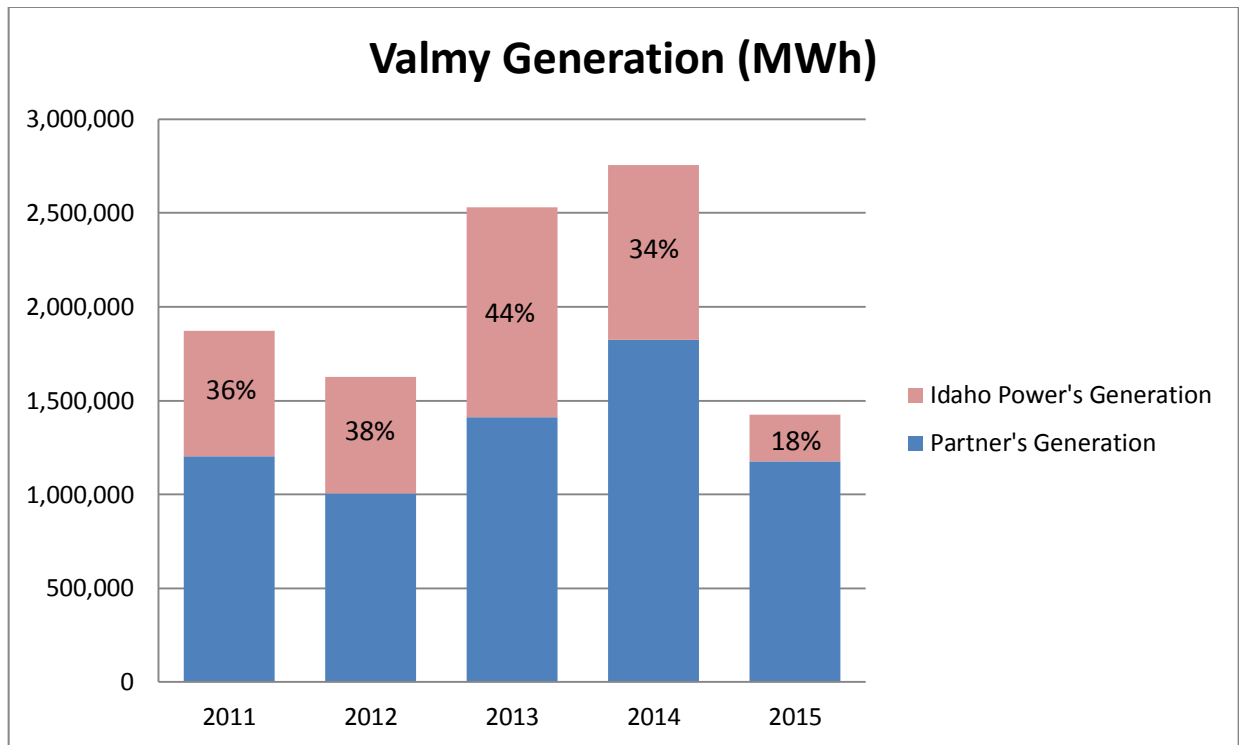
CASE: UE 301
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**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 202

**Exhibits in Support
Of Testimony
(March Forecast)**

May 20, 2016



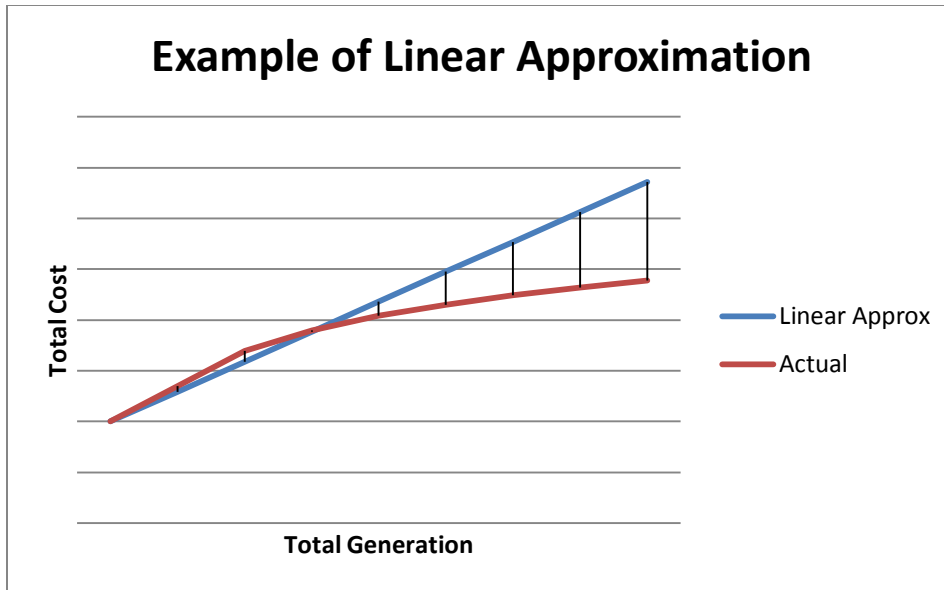
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**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 203

**Exhibits in Support
Of Testimony
(March Forecast)**

May 20, 2016



CASE: UE 301
WITNESS: SCOTT GIBBENS

**PUBLIC UTILITY COMMISSION
OF
OREGON**

STAFF EXHIBIT 204

**Exhibits in Support
Of Testimony
(March Forecast)**

May 20, 2016

