

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

May 29, 2019

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

Re.

Docket No. UM 1853(2)

In the Matter of Idaho Power Company's Application for Deferred Accounting of

Certain Costs Associated with the North Valmy Power Plant

Idaho Power Company's Application

Attention Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power Plant.

As required by OAR 860-027-0300, the Application has been served on the parties to the UE 233 service list, and the parties to the UE 316 service list, as indicated in the Certificate of Service.

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

Very truly yours,

Lisa D. Nordstrom

Lin D. Mudotram

LDN/kkt

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

1	BEFORE THE PUBLIC OTILITY COMMISSION				
2	OF OREGON				
3	UM 1853(2)				
4	In the Matter of Idaho Power Company's				
5	Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power APPLICATION				
6	Plant				
7	I. <u>INTRODUCTION</u>				
8	Pursuant to ORS 757.210, ORS 757.259, and OAR 860-027-0300, Idaho Power				
9	Company ("Idaho Power" or "Company") hereby requests an accounting order reauthorizing				
10	Idaho Power to defer decommissioning revenues collected and decommissioning costs				
11	incurred pursuant to Order No. 17-235. The stipulation approved by Order No. 17-235				
12	includes the collection of the North Valmy Power Plant ("Valmy") amounts and is an				
13	"automatic adjustment clause" ("AAC") as defined in ORS 757.210. Idaho Power seeks				
14	reauthorization for this deferral effective as of June 1, 2019. In support of this Application				
15	Idaho Power states:				
16	1.	Idaho Power is a public utility in the	e state of Oregon and its rates, services, and		
17		accounting practices are subject	ct to the regulation of the Public Utility		
18		Commission of Oregon ("Commiss	sion").		
19	2.	This Application is filed pursua	ant to ORS 757.259, which allows the		
20		Commission, upon application, to	authorize the deferral of certain items for		
21		later inclusion in rates.			
22	3.	Communications regarding this Ap	oplication should be addressed to:		
23		Lisa Nordstrom	Courtney Waites		
24		Idaho Power Company P.O. Box 70	Idaho Power Company P.O. Box 70		
25		Boise, ID 83707 Inordstrom@idahopower.com	Boise, ID 83707 cwaites@idahopower.com		
26		dockets@idahopower.com			

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Idaho Power Company 1221 West Idaho Street Boise, ID 83702

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

Α. Description

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3 With this deferral application, Idaho Power seeks reauthorization from the Commission 4 to defer, for future true-up, decommissioning revenues collected and decommissioning costs 5 incurred in accordance with Order No. 17-235.

B. Reasons for Deferral

On November 2, 2016, Idaho Power filed an application with the Commission requesting approval to update costs associated with Valmy Units 1 and 2 to reflect an endof-life for those units of 2025, and further requested authority to recover all Valmy-related 10 costs by 2025 to align the expected remaining operating life of the plant with cost recovery, resulting in cost recovery from customers who are served by the plant (Docket No. UE 316). 11 In June 2017, the Commission issued Order No. 17-235, approving the recovery of the following expenses and investment associated with Valmy through an AAC: (1) the accelerated depreciation associated with the existing Valmy plant investments through May 31, 2017, (2) the return on undepreciated existing capital investments at Valmy until its endof-life based upon the then currently authorized rate of return, and (3) estimated future decommissioning expenses.

18 In UE 345/Advice No. 18-02, the Commission issued Order No. 18-199, approving the 19 accelerated depreciation associated with Idaho Power's exit from operations of Valmy Unit 1 20 by December 31, 2019. Filed pursuant to Order No. 17-235 and ORS 757.259(2)(e), the 21 AAC requires Idaho Power to file a deferral request. This deferral is intended to provide for 22 the deferral and tracking of decommissioning revenues collected and decommissioning costs 23 incurred until decommissioning activities are concluded. In addition, this deferral will allow 24 Idaho Power to appropriately match the costs borne by and benefits received by customers.

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C. Proposed Accounting

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2 Idaho Power records revenues and expenses that would be subject to the deferral order in accordance with the Code of Federal Regulations to the Federal Energy Regulatory Commission ("FERC") Accounts 440-444 (Operating Revenues), FERC Account 557 (Other 5 Expenses), and FERC Accounts 500-598 (Operations and Maintenance Accounts). Upon 6 receiving approval of a deferral, Idaho Power proposes to record the deferred amounts to FERC Account 182 (Regulatory Assets) until decommissioning activities are concluded. After decommissioning activities are concluded, amounts in the deferral account, either 8 positive or negative, will be recovered or refunded in customer rates through a surcharge or 10 credit, as appropriate.

D. **Estimate of Amounts**

Order No. 17-235 approved an Oregon jurisdictional revenue requirement increase of \$1,056,800 associated with the recovery of the annual incremental return on and accelerated depreciation of existing Valmy investments, and decommissioning costs related to the Valmy 15 shutdown. In addition, Order No. 18-199 approved an Oregon jurisdictional revenue requirement increase of \$2,498,886 associated with the recovery of the accelerated depreciation of existing Valmy Unit 1 investments by year end 2019. Idaho Power estimates 18 the deferral account will contain the Oregon jurisdictional share of decommissioning costs, approximately \$1,870,000, at December 31, 2025. Because deferred amounts associated with decommissioning costs are dependent on factors that cannot be precisely forecasted. Idaho Power cannot provide a precise estimate of the total deferred amount.

E. **Notice**

A copy of the Notice of Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power Plant and a list of persons served with the Notice are attached to the Application as Attachment A.

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1	III. OAR 860-027-0300(4) REQUIREMENTS
2	A. <u>Entries in the Deferred Account to Date</u>
3	Attached to the Application as Attachment B is a description and explanation of the
4	entries specific to decommissioning expenses in this deferred account as of the date of the
5	Application.
6	B. Reason for Continuation of Deferred Accounting
7	As discussed in detail above, this deferral is intended to capture decommissioning
8	revenues collected and decommissioning costs incurred in accordance with Order No. 17-
9	235.
10	III. CONCLUSION
11	Reauthorization of deferred accounting treatment is an appropriate, just, and
12	reasonable means of implementing Order No. 17-235.
13	For the reasons stated above, Idaho Power requests permission to defer
14	decommissioning revenues collected and decommissioning costs incurred beginning June
15	1, 2019, pursuant to Order No. 17-235.
16	DATED: May 29, 2019
17	IDAHO POWER COMPANY
18	Lin D. Madotrom
19	LISA D. NORDSTROM
20	Attorney for Idaho Power Company
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Attachment A

BEFORE THE PUBLIC UTILITY COMMISSION

1	OF OREGON			
2	UM 1853(2)			
3				
4	In the Matter of Idaho Power Company's Application for Deferred Accounting of Certain NOTICE OF APPLICATION FOR DEFERRED ACCOUNTING OF			
5	Costs Associated with the North Valmy Power Plant CERTAIN COSTS ASSOCIATED WITH THE NORTH VALMY POWER PLANT			
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7	On May 29, 2019, Idaho Power Company ("Idaho Power") filed an application with			
8	the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the			
9	deferral of decommissioning revenues collected and decommissioning costs incurred			
10	pursuant to Order No. 17-235.			
11	Approval of Idaho Power's Application will not authorize a change in Idaho Power's			
12	rates, but will permit the Commission to consider allowing such deferred amounts in rates in			
13	a subsequent proceeding.			
14	Idaho Power's Application will be posted on the Commission website for persons who			
15	wish to obtain a copy or they may contact the following:			
16	Lisa D. Nordstrom Idaho Power Company			
17	1221 West Idaho Street			
18	P.O. Box 70 Boise, ID 83707			
19	Inordstrom@idahopower.com			
20	Any person who wishes to submit written comments to the Commission on Idaho			
21	Power's Application must do so by no later than June 26, 2019.			
22	DATED: May 29, 2019.			
23	Lin D. Madotrom			
24	Lisa D. Nordstrom			
25	Attorney for Idaho Power Company			
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Attachment B

PEOPLESOFT QUERY OF VALMY OREGON DECOMMISSIONING COSTS COLLECTED THRU 4/30/2019

Year	Account	DB2DATE	DISTDESC	Descr	Sum TOTAMT
2017	182436	7/31/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017	182436	8/31/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017	182436	9/30/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017	182436	10/31/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017	182436	11/30/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017	182436	12/31/2017	RECORD COMBINED REVENUE	VALMY OR DECOMM	-6694.00
2018	182436	1/31/2018	RECORD COMBINED REVENUE	VALMY OR DECOMM	-6694.00
2018	182436	2/28/2018	RECORD COMBINED REVENUE	VALMY OREGON DECOMM ENTRY	-6694.00
2018	182436	3/31/2018	LEVELIZED REVENUE	VALMY OREGON DECOMM	-6694.00
2018	182436	4/30/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	5/31/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	6/30/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	7/31/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	8/31/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	9/30/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	10/31/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	11/30/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436	12/31/2018	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436	1/31/2019	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436	2/28/2019	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436	3/31/2019	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436	4/30/2019	LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00

1	CERTIFICATE OF SERVICE			
2	UM 1853(2)			
3	I hereby certify that on May 29, 2019, I served a true and correct copy of Idaho			
4	Power Company's Application for Deferred Accounting of Certain Costs Associated with			
5	the North Valmy Power Plant on the parties in Dockets UM 233 and UE 316 by e-mail to			
6	said person(s) as indicated below.			
7 8	OPUC Dockets Citizens' Utility Board of Oregon dockets@oregoncub.org	Robert Jenks Citizens' Utility Board of Oregon bob@oregoncub.org		
9	Lisa F. Rackner	Stephanie S. Andrus		
10	McDowell Rackner & Gibson PC dockets@mrg-law.com	Department of Justice Business Activities Section stephanie.andrus@state.or.us		
11	Mitala Managa			
12	Mitch Moore Public Utility Commission of Oregon mitch.moore@state.or.us	Scott Gibbons Public Utility Commission of Oregon scott.gibbons@state.or.us		
13	Commission of the Commission o			
14	Erik Colville Public Utility Commission of Oregon erik.colville@state.or.us	Gregory M. Adams Richardson Adams, PLLC greg@richardsonadams.com		
15	Peter J. Richardson	Joshua D. Johnson		
16	Richardson Adams, PLLC peter@richardsonadams.com	Attorney at Law jdj@racinelaw.net		
17	Dr. Don Reading	Anthony J. Yankel		
18	dreading@mindspring.com	Utility Net, Inc. tony@yankel.net		
19	Randy Dahlgren	Douglas C. Tingey		
20	Portland General Electric Company pge.opuc.filings@pgn.com	Portland General Electric Company doug.tingey@pgn.com		
21	Irion A. Sanger	Wendy Gerlitz		
22	Davison Van Cleve, PC irion@sanger-law.com	NW Energy Coalition wendy@nwenergy.org		
23	Etta Lockey	Sarah Link		
24	Pacific Power etta.lockey@pacificorp.com	Pacific Power sarah.link@pacificorp.com		
25	<u>cita.iocite y (aspacificor p. com</u>	Saran, III N@paoinoorp.com		
26				

1	Oregon Dockets	Donald W. Schoenbeck
2	PacifiCorp, d/b/a Pacific Power oregondockets@pacificorp.com	Regulatory & Cogeneration Services, Inc. dws@r-c-s-inc.com
3	John W. Stephens Esler Stephens & Buckley	Renewable Northwest Project dockets@renewablenw.org
4	stephens@eslerstephens.com ortez@eslerstephens.com	dockets@renewablenw.org
5	Somer Moser	Ming Peng
6	Department of Justice somer.moser@doj.state.or.us	Public Utility Commission of Oregon ming.peng@state.or.us
7	somer.moser@doj.state.or.ds	ming.peng@state.or.us
8	DATED: May 29, 2019.	
9	_	Kimbert Towell
10	Ī	Kimberly Towell Executive Assistant
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