

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

December 28, 2018

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UM 1928(1)
In the Matter of Idaho Power Company's Application for Deferred
Accounting of Earnings Related to the U.S. Tax Cuts and Jobs Act

Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Application for Deferred Accounting of Earnings Related to the U.S. Tax Cuts and Jobs Act. The Notice of Application for Deferred Accounting is attached to the Application as Attachment A. The Application and Notice have been served on the parties of Idaho Power Company's last general rate case, Docket UE 233.

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

LDN:csb
Attachment

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 1928(1)**

In the Matter of Idaho Power Company's
Application for Deferred Accounting of
Earnings Related to the U.S. Tax Cuts and
Jobs Act

APPLICATION

I. INTRODUCTION

Pursuant to ORS 757.259 and OAR 860-027-0300, Idaho Power Company ("Idaho Power" or "Company") hereby requests an accounting order reauthorizing the Company to defer for later ratemaking treatment impacts associated with the income tax provisions of H.R.1, also known as the U.S. Tax Cuts and Jobs Act ("Tax Act"). The Tax Act, signed into law on December 22, 2017, provides for "reconciliation pursuant to titles II and V of the concurrent resolution on the budget for fiscal year 2018." On May 30, 2018, the Public Utility Commission of Oregon ("Commission") issued Order No. 18-199, Idaho Power's initial authorization to defer for later ratemaking treatment the impacts of the Tax Act for the period January 1, 2018, through December 31, 2018. Idaho Power seeks reauthorization for this deferral effective as of January 1, 2019. 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 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.

1 intended to capture the tax reform benefits that will be amortized in rates, is filed pursuant to
2 ORS 757.259(2)(e), and is intended to minimize the frequency of rate changes or the
3 fluctuation of rate levels and match appropriately the costs borne by and benefits received
4 by customers.

5 **C. Proposed Accounting**

6 Idaho Power will record amounts subject to the deferral order in accordance with the
7 Code of Federal Regulations to the Federal Energy Regulatory Commission ("FERC")
8 Account 254, Regulatory Liabilities, with the corresponding entry to FERC Account 449,
9 Operating Revenues. Absent approval, the Company would continue to record the collection
10 of the revenue requirement amounts in general business revenues, FERC Account 440,
11 Operating Revenues, with no offset.

12 **D. Estimate of Amounts**

13 In accordance with Order No. 18-199, Idaho Power will defer Oregon-jurisdictional tax
14 reform benefits of \$1,483,736 associated with 2019.

15 **E. Notice**

16 A copy of the Notice of Application for Deferred Accounting of earnings related to the
17 Tax Act and a list of persons served with the Notice are attached to the Application as
18 Attachment A.

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

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

21 Attached to the Application as Attachment B is a description and explanation of the
22 entries in this deferred account as of the date of the Application.

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

24 As discussed in detail above, this deferral is intended to capture the 2019 tax reform
25 benefits that will be amortized in rates and is authorized pursuant to Order No. 18-199.

26

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

IV. CONCLUSION

Deferred accounting treatment is an appropriate, just, and reasonable means of implementing Order No. 18-199, which provides in customer rates the Oregon-jurisdictional tax benefits of \$1,483,736. For the reasons stated above, Idaho Power requests permission to reauthorize the deferral of impacts associated with the Tax Act beginning January 1, 2019, and pursuant to ORS 757.259(2)(e).

DATED: December 28, 2018.

IDAHO POWER COMPANY



LISA D. NORDSTROM
Attorney for Idaho Power Company

Attachment A

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UM 1928(1)**

4
5 In the Matter of Idaho Power Company's
6 Application for Deferred Accounting of
7 Earnings Related to the U.S. Tax Cuts and
Jobs Act

**NOTICE OF APPLICATION FOR
DEFERRED ACCOUNTING**

8 On December 28, 2018, Idaho Power Company ("Idaho Power") filed its Application
9 with the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral
10 of the Oregon-jurisdictional tax reform benefits pursuant to Order No. 18-199.

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's website for persons
15 who wish to obtain a copy or they may contact the following:

16 Lisa D. Nordstrom
17 Idaho Power Company
18 1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
lnordstrom@idahopower.com

19 Any person who wishes to submit written comments to the Commission on Idaho
20 Power's Application must do so by no later than January 28, 2019.

21 DATED: December 28, 2018.

IDAHO POWER COMPANY

22
23 

LISA D. NORDSTROM
Attorney for Idaho Power Company

Attachment B

Account	DB2DATE	DISTDESC	Descr	TOTAMT
254452	6/30/2018	PROV RATE REFUND OR	Rate Related Amortization	(380,000.00)
254452	10/31/2018	OREGON	Rate Related Amortization	(159,147.48)
254452	11/30/2018	OREGON	Rate Related Amortization	6,729.01

1 **CERTIFICATE OF SERVICE**

2 **UM 1928(1)**

3 I hereby certify that on December 28, 2018, I served a true and correct copy of
4 Idaho Power Company's Application for Deferred Accounting of Earnings Related to the
5 U.S. Tax Cuts and Jobs Act on the parties of record in Docket UE 233 by e-mail to said
6 person(s) as indicated below.

7 OPUC Dockets
8 Oregon Citizens' Utility Board
dockets@oregoncub.org

Robert Jenks
Oregon Citizens' Utility Board
bob@oregoncub.org

9 Lisa F. Rackner
10 McDowell Rackner & Gibson PC
dockets@mrq-law.com

Stephanie S. Andrus
Department of Justice
Business Activities Section
stephanie.andrus@state.or.us

11 Dr. Don Reading
12 dreading@mindspring.com

Judy Johnson
Public Utility Commission of Oregon
judy.johnson@state.or.us

13 Erik Colville
14 Public Utility Commission of Oregon
erik.colville@state.or.us

Gregory M. Adams
Richardson Adams, PLLC
greg@richardsonadams.com

15 Peter J. Richardson
16 Richardson Adams, PLLC
peter@richardsonadams.com

Joshua D. Johnson
Attorney at Law
jdj@racinelaw.net

17 Renewable Northwest Project
18 dockets@renewablenw.org

Anthony J. Yankel
Utility Net, Inc.
tony@yankel.net

19 Randy Dahlgren
20 Portland General Electric Company
pge.opuc.filings@pgn.com

Douglas C. Tingey
Portland General Electric Company
doug.tingey@pgn.com

21 Irion A. Sanger
22 Davison Van Cleve, PC
irion@sanger-law.com

Wendy Gerlitz
NW Energy Coalition
wendy@nwenergy.org

23 Etta Lockey
24 Pacific Power
etta.lockey@pacificcorp.com

Sarah E. Link
Pacific Power
sarah.link@pacificcorp.com

1 Oregon Dockets
2 PacifiCorp, d/b/a Pacific Power
oregondockets@pacificorp.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
dws@r-c-s-inc.com

3 John W. Stephens
4 Esler Stephens & Buckley
stephens@eslerstephens.com
5 mec@eslerstephens.com

6 DATED: December 28, 2018.

7
8 
9 Christa Beary, Legal Assistant

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