



ALISHA TILL
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February 25, 2020

VIA ELECTRONIC FILING AND US MAIL

Attention: Filing Center
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket UE ___ – Idaho Power Company's 2019 Annual Power Supply Expense True-Up

Attention Filing Center:

Enclosed in the above-referenced docket are an original and five copies of Idaho Power Company's 2019 Annual Power Supply Expense True-Up and Direct Testimony and Exhibits of Courtney Waites.

A copy of this filing has been served on all parties to the 2018 Annual Power Supply Expense True-Up, Docket UE 354, via electronic mail as indicated on the attached certificate of service.

Please contact me with any questions

Sincerely,

A handwritten signature in black ink that reads "Alisha Till".

Alisha Till
Paralegal

Attachments

cc: UE 354 Service List

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE _____

In the Matter of the Application of IDAHO
POWER COMPANY for Amortization in Rates
of the Power Cost Adjustment Mechanism,
Intervenor Funding Amounts, and EIM Start-
Up Expenses.

**2019 ANNUAL POWER SUPPLY
EXPENSE TRUE-UP**

8 In compliance with Order No. 08-238, as amended by Order No. 09-373 (hereinafter
9 “Order No. 08-238”), Idaho Power Company (“Idaho Power” or “Company”) hereby files its
10 2019 Annual Power Supply Expense True-Up (“True-Up”), which implements the power cost
11 adjustment mechanism (“PCAM”) by calculating the deviation between actual net power
12 supply expenses (“NPSE”) and those expenses recovered through rates. Accordingly, Idaho
13 Power requests that the Public Utility Commission of Oregon (“Commission”) issue an order
14 confirming that the Company has correctly calculated the amount of the True-Up for later
15 inclusion in rates as \$0.00 and confirming that the Company will add \$239,890 of Oregon
16 jurisdictional net proceeds from the sale of Renewable Energy Credits (“RECs”) as a credit
17 to the Annual Power Supply Expense True-Up Balancing Account (“True-Up Balancing
18 Account”) for 2019. In addition, the Company requests authorization to amortize intervenor
19 funding amounts deferred since the Company’s last request to amortize intervenor funding
20 amounts commenced on June 1, 2019, and begin amortization of deferred start-up
21 operations and maintenance (“O&M”) expenses associated with Idaho Power’s participation
22 in the Energy Imbalance Market (“EIM”). This filing is based upon the following:

23 1. In Order No. 08-238, the Commission approved a PCAM for Idaho Power that
24 requires the Company to file, in February of each year, a True-Up that will implement the
25 PCAM by calculating the deviation between actual NPSE and those expenses recovered
26 through rates. Order No. 08-238 further requires that eligible power supply expense

1 deviations be added to the True-Up Balancing Account at the end of each 12-month period
2 ending December, along with 50 percent of the annual interest calculated at the Company's
3 authorized cost of capital. The required calculations are detailed in the Stipulation attached
4 as Exhibit A to Order No. 08-238.

5 2. As described in the Direct Testimony of Courtney Waites filed herewith, Idaho
6 Power has calculated its True-Up in accordance with the methodology approved by the
7 Commission in Order No. 08-238, and has determined that the amount of \$0.00 should be
8 added to the True-Up Balancing Account because the Oregon Allocated Power Cost
9 Deviation is within the deadbands as calculated using the Company's 2018 Results of
10 Operations ("ROO") report. Consistent with Order No. 09-373, the Company will recalculate
11 the deadbands in April 2020 using the 2019 ROO and will make any appropriate
12 supplemental filings. Idaho Power will apply the net proceeds from the sale of RECs as a
13 credit to the True-Up Balancing Account in compliance with Order Nos. 11-086 and 17-185.
14 In addition, Idaho Power requests approval to amortize approximately \$37,383 in intervenor
15 funding amounts and \$23,842 in EIM O&M start-up expenses effective June 1, 2020.

16 3. Idaho Power wishes to waive paper service in this docket. Communications
17 regarding this Application should be addressed to:

18 Lisa D. Nordstrom
19 Idaho Power Company
20 1221 West Idaho Street (83702)
21 P.O. Box 70
22 Boise, Idaho 83707
23 lnordstrom@idahopower.com

 Adam Lowney
 McDowell Rackner Gibson PC
 419 SW 11th Avenue, Suite 400
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21 Regulatory Dockets
22 Idaho Power Company
23 1221 West Idaho Street (83702)
24 P.O. Box 70
25 Boise, Idaho 83707
26 dockets@idahopower.com

25 For all of the above reasons, Idaho Power requests the Commission issue its order
26 confirming that the Company has correctly calculated the amount of the PCAM True-Up,

1 confirm that \$239,890 be applied as a credit to the True-Up Balancing Account, and authorize
2 the amortization in rates of deferred intervenor funding amounts and deferred EIM O&M start-
3 up expenses.

4 Respectfully submitted this 25th day of February 2020.

5 McDOWELL RACKNER GIBSON PC

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE _____

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR)
AMORTIZATION IN RATES OF THE POWER)
COST ADJUSTMENT MECHANISM,)
INTERVENOR FUNDING AMOUNTS AND EIM)
START-UP EXPENSES.)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

COURTNEY WAITES

February 25, 2020

1 **Q. Please state your name, business address, and present position with Idaho**
2 **Power Company (“Idaho Power” or “Company”).**

3 A. My name is Courtney Waites. I am employed by Idaho Power as a Senior Regulatory
4 Analyst in the Regulatory Affairs Department. My business address is 1221 West
5 Idaho Street, Boise, Idaho 83702.

6 **Q. Please describe your educational background.**

7 A. In December of 1998, I received a Bachelor of Arts degree in Accounting from the
8 University of Alaska in Anchorage, Alaska. In 2000, I earned a Master of Business
9 Administration degree from Alaska Pacific University. I have attended New Mexico
10 State University’s Center for Public Utilities and the National Association of Regulatory
11 Utility Commissioners “Practical Skills for the Changing Electric Industry” conference,
12 the Electric Utility Consultants, Inc.’s “Introduction to Rate Design and Cost of Service
13 Concepts and Techniques for Electric Utilities” conference, Edison Electric Institute’s
14 “Introduction to Public Utility Accounting” course, Edison Electric Institute’s “Electric
15 Rates Advanced” course, SNL Knowledge Center’s “Essentials of Regulatory Finance”
16 course, and the Financial Accounting Institute’s “Utility Finance and Accounting”
17 seminar.

18 **Q. Please describe your work experience.**

19 A. I began my employment with Idaho Power in December 2004 in the Accounts Payable
20 Department. In 2005, I accepted a Regulatory Accountant position in the Finance
21 Department where one of my tasks was to assist in responding to regulatory data
22 requests pertaining to financial issues. In 2006, I accepted my current position,
23 Regulatory Analyst, in the Regulatory Affairs Department. My duties as a Regulatory
24 Analyst include providing support for the Company’s various regulatory activities,
25 including tariff administration, regulatory ratemaking, and compliance filings, and the
26 development of various pricing strategies and policies.

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to describe the quantification of the Company's Annual
3 Power Supply Expense True-Up ("True-Up Rate"), consistent with the methodology
4 approved in Order Nos. 08-238 and 09-373. In order to determine the True-Up Rate,
5 I will first describe the quantification of the dollar balance in the Annual Power Supply
6 Expense True-Up Balancing Account ("True-Up Balancing Account"), including the
7 credit for the sale of SO2 Allowances and Renewable Energy Credits ("REC" or
8 "RECs") made during the 2019 deferral year and the true-up of Energy Imbalance
9 Market ("EIM") operation and maintenance ("O&M") expenses. In addition, I will
10 describe the Company's proposal to update the level of amortization associated with
11 the collection of intervenor funding deferrals as well as the inclusion of amortization of
12 deferred start-up expenses associated with the Company's participation in the EIM.

13 **Q. What is the True-Up Balancing Account?**

14 A. As described in Schedule 56, the True-Up Balancing Account is a Company account
15 where the power cost adjustment mechanism ("PCAM") is quantified at the end of each
16 12-month period ending December, along with 50 percent of the annual interest
17 calculated at the Company's authorized cost of capital. Subject to an earnings test,
18 the PCAM is 90 percent of the amount that the Oregon Allocated Power Cost Deviation
19 is above or below the Power Supply Expense Deadband.

20 **Q. How does Order No. 09-373 impact the Annual Power Supply Expense True-Up
21 Balancing Account?**

22 A. Order No. 09-373 approved an amendment to Order No. 08-238 clarifying which year's
23 Results of Operations ("ROO") should be relied upon in calculating the deferral
24 deadbands and the earnings test components of the PCAM. Idaho Power, the Oregon
25 Citizens' Utility Board, and the Staff of the Public Utility Commission of Oregon
26 ("Commission") agreed that for the initial calculation of the Annual Power Supply

1 Expense True-Up filed in February each year, the Company will use the most recent
2 ROO report available, the ROO for the year preceding the deferral period. Once the
3 ROO report for the year of the deferral period becomes available, the Company will
4 file an updated calculation of the Annual Power Supply Expense True-Up. The
5 updated calculation is expected to occur in April of each year.

6 **Q. Have you prepared an exhibit that quantifies the initial estimate of the amount**
7 **to be added to the True-Up Balancing Account for 2019?**

8 A. Yes. Exhibit 101 is the Company's quantification of the net power supply expenses to
9 be reviewed for inclusion in the True-up Balancing Account for 2019.

10 **Q. Please describe Exhibit 101 and the Company's quantification of the estimated**
11 **amount to be included in the True-Up Balancing Account.**

12 A. In Exhibit 101, the columns detail the monthly and year-to-date deviations between
13 actual net power supply expenses incurred and the power costs collected through
14 rates. The last column represents the annual amounts considered in determining the
15 amount to be included in the True-Up Balancing Account.

16 **Q. Please provide a general description of the calculations used to determine the**
17 **amount to be included in the True-Up Balancing Account.**

18 A. First, the Actual Unit Cost is compared to the Combined Rate to determine the per unit
19 power cost deviation. The per unit power cost deviation is then multiplied by total
20 system actual energy sales to determine the power cost deviation on a total system
21 basis. Next, the Oregon allocation factor is applied to the total system power cost
22 deviation to compute the Oregon Allocated Power Cost Deviation. Then, Power
23 Supply Expense Deadbands are applied and, if necessary, an earnings test is
24 performed. The resulting eligible deferral is the amount proposed to be added to the
25 True-Up Balancing Account.

26 **Q. How is the Actual Unit Cost calculated?**

1 A. The Actual Unit Cost for net power supply expenses incurred is the total Actual Net
2 Power Supply Expense ("Actual NPSE") incurred divided by the Actual Sales. The
3 Actual NPSE is determined on a system-wide basis and includes amounts booked to
4 Federal Energy Regulatory Commission Accounts 501 (Fuel-Coal), 547 (Fuel-Gas),
5 555 (Purchased Power), and 447 (Sales for Resale). In short, Actual NPSE is
6 calculated by adding fuel plus purchased power less off-system sales. The Actual
7 NPSE for 2019 was \$367,425,826.70. Actual Sales for 2019 were 14,536,711
8 megawatt-hours ("MWh"). Dividing Actual NPSE by Actual Sales results in the Actual
9 Unit Cost of \$25.28 per MWh ($\$367,425,826.70 \div 14,536,711 \text{ MWh} = \25.28 per
10 MWh).

11 **Q. What is the next step in the true-up calculation?**

12 A. The next step in the true-up calculation is to compare the Actual Unit Cost to the
13 Combined Rate. The Combined Rate is comprised of two components: (1) The
14 October Power Cost Update and (2) the March Power Cost Forecast. The Combined
15 Rate in effect from January through May 2019 was \$25.67/MWh and the Combined
16 Rate in effect from June through December 2019 was \$26.69/MWh. The Combined
17 Rate reflects the Commission-approved amounts reflected in rates during the months
18 of the true-up period. The Annual Combined Rate, which is based on the five months
19 of \$25.67/MWh and the seven months of \$26.69/MWh, is \$26.32/MWh.

20 **Q. What is the deviation between the Actual Unit Cost and the Combined Rate for**
21 **2019?**

22 A. For 2019, the deviation between the Actual Unit Cost (\$25.28/MWh) and the Combined
23 Rate (\$26.32/MWh) is negative \$1.05 per MWh ($\$25.28 - \$26.32 = (\$1.05)$). This
24 amount is multiplied by the Actual Sales (14,536,711 MWh) to determine the deviation
25 from the forecast on a system-wide basis, or negative \$15,225,136.12.
26

1 **Q. How is the Oregon jurisdictional portion of the deviation from the forecast on a**
2 **system-wide basis calculated?**

3 A. The Oregon Allocated Power Cost Deviation is calculated by multiplying the system-
4 wide deviation from the forecast by the Oregon allocation factor. The Oregon
5 allocation factor is the energy allocator used in the ROO. Currently, using the 2018
6 ROO, the Oregon allocation factor is 4.63 percent. This results in an Oregon Allocated
7 Power Cost Deviation of negative \$704,923.80, meaning the amount of the Oregon
8 allocated power supply costs recovered in rates was more than the actual Oregon
9 allocated power supply costs (($\$15,225,136.12$) X 4.63 percent = ($\$704,923.80$)).

10 **Q. You stated earlier that as a result of Order No. 09-373 you will use the previous**
11 **year's ROO to calculate the Annual Power Supply Expense True-Up filed in**
12 **February and once the ROO for the year of the deferral is available, you will**
13 **update the calculation of the Annual Power Supply Expense True-Up. Will the**
14 **Oregon Allocated Power Cost Deviation change?**

15 A. If the Oregon allocation factor in the 2019 ROO is different than the Oregon allocation
16 factor from the 2018 ROO, then the Oregon Allocated Power Cost Deviation will
17 change.

18 **Q. Is the Oregon Allocated Power Cost Deviation of negative \$704,923.80 the**
19 **amount of dollars to be added to the True-Up Balancing Account?**

20 A. No. Once the Oregon Allocated Power Cost Deviation is calculated, a Power Supply
21 Expense Deadband is applied.

22 **Q. Please explain how the Power Supply Expense Deadband is applied.**

23 A. The Power Supply Expense Deadband is based on the Company's capital structure
24 and rate base measured on an Oregon basis from the most recent Oregon ROO
25 report. The Oregon Allocated Power Cost Deviation is compared to the positive and/or
26 negative deadbands. A positive deviation (Actual NPSE greater than those recovered

1 through the Combined Rate) constitutes an excess power supply expense. This
2 expense is first reduced by a deadband that is the dollar equivalent of 250 basis points
3 of return on equity ("ROE") (Oregon basis). A negative deviation (Actual NPSE less
4 than those recovered through the Combined Rate) is a power supply expense savings.
5 This savings is reduced by a deadband that is the dollar equivalent of 125 basis points
6 of ROE (Oregon basis).

7 **Q. What are the deadbands used for the calendar year 2018?**

8 A. Using the Company's Oregon rate base of \$140,969,719 and the percentage of equity
9 in the capital structure as of December 31, 2018, 54.454 percent, the Upper Deadband
10 of 250 Basis Points equals \$2,584,287 and the Lower Deadband of 125 Basis Points
11 equals negative \$1,292,143. See Exhibit 102.

12 **Q. Will the deadbands change as a result of the 2019 ROO?**

13 A. Yes, they will. A final determination of the deadbands will be made once the 2019
14 ROO is available in April 2020.

15 **Q. The calculation of the deadbands includes the application of a net-to-gross
16 factor. Do the provisions of the U.S. Tax Cuts and Jobs Act ("Tax Act") impact
17 Idaho Power's net-to-gross factor?**

18 A. Yes. The provision of the Tax Act that reduced the federal corporate income tax rate
19 from 35 percent to 21 percent, thus reducing Idaho Power's net-to-gross factor,
20 became effective January 1, 2018, and therefore was used to compute the deadbands
21 using the 2018 ROO.

22 **Q. Based upon the initial estimate of deadbands, what is the amount of the net
23 power supply expense deviation proposed to be added to the True-Up Balancing
24 Account for the calendar year 2019?**

25
26

1 A. The amount of the Oregon Allocated Power Cost Deviation, negative \$704,923.80, is
2 greater than the Lower Deadband of negative \$1,292,143. Therefore, the dollar
3 amount to be considered to be added to the True-Up Balancing Account is zero.

4 **Q. Once the deferral is calculated, an earnings test must be applied. Has the**
5 **Company performed the earnings test described above?**

6 A. No.

7 **Q. Why was an earnings test not performed?**

8 A. Order No. 08-238 states that before any amounts of a deferral are approved for
9 inclusion in the Annual Power Supply Expense True-Up Balancing Account for
10 subsequent recovery or refund, the Commission will apply an earnings test. Because
11 the Company is not proposing any deferral amounts be added to the Annual Power
12 Supply Expenses True-Up Balancing Account, the Company was not required to
13 perform an earnings test.

14 **Q. In previous years the Company has proposed to offset its Oregon Allocated**
15 **Power Cost Deviation by the sale of SO₂ Allowances made during the deferral**
16 **year. Were any sales of SO₂ Allowances made during the calendar year 2019?**

17 A. No, there were no sales of SO₂ Allowances made during the calendar year 2019.

18 **Q. Order No. 11-086 requires Idaho Power to apply the net proceeds from the sale**
19 **of RECs as a credit to the True-Up Balancing Account. Were any sales of RECs**
20 **made during the calendar year 2019?**

21 A. Yes. The total Oregon jurisdictional customer benefit of REC sales made in 2019 is
22 \$239,889.99 (see Exhibit 103). Consistent with Order Nos. 11-086 and 17-185, the
23 customer benefit of \$239,889.99 from the sale of RECs will be applied as a credit to
24 the True-Up Balancing Account.

25 **Q. What was the 2019 variance between actual EIM-related O&M expenses and**
26 **those included in customer rates?**

1 A. Order No. 19-189 in Docket No. UE 350, Idaho Power's 2019 Annual Power Cost
2 Update, approved an Oregon jurisdictional EIM-related revenue requirement of
3 \$111,328 which included \$34,429 in O&M expenses. Actual EIM-related O&M
4 expenses incurred in 2019 were \$73,048, reflecting a total Oregon jurisdictional
5 variance of \$38,619. See Exhibit 104 for the variance detail by O&M expense account.

6 **Q. Does the inclusion of EIM-related O&M expense variances impact the deferral
7 amount the Company is proposing be added to the Annual Power Supply
8 Expenses True-Up Balancing Account?**

9 A. No. Adding the EIM-related O&M expenses to the power cost deviation would reduce
10 the Oregon Allocated Power Cost Deviation by \$38,619, resulting in a deviation from
11 forecast of negative \$666,305, an amount that is still greater than the Lower Deadband
12 of negative \$1,292,143. Therefore, inclusion of these amounts has no impact on the
13 Company's proposal that no deferral amounts be added to the Annual Power Supply
14 Expenses True-Up Balancing Account.

15 **Q. Are there any other amounts the Company is proposing to add to the True-Up
16 Balancing Account?**

17 A. No. However, as part of this request, Idaho Power is also proposing to update the
18 level of amortization associated with the collection of intervenor funding deferrals
19 approved in Order No. 19-193 as well as include amortization of deferred start-up
20 expenses associated with the Company's participation in the EIM as approved in
21 Docket No. UM 1821 with Order Nos. 17-215 and 18-137.

22 **Q. Please describe the intervenor funding deferral amortization approved in Order
23 No. 19-193.**

24 A. Order No. 19-193 issued in Docket No. UE 354 approved the amortization and
25 collection through Schedule 56 of \$52,240 in deferred intervenor funding amounts for
26 the period beginning June 1, 2019, through May 31, 2020. All intervenor funding

1 amounts approved for amortization in Order No. 19-193 were associated with
2 intervenors acting on behalf of the residential customer class and are therefore
3 collected only from residential customers.

4 **Q. Please describe Idaho Power's proposal to update the level of amortization**
5 **collection associated with intervenor funding amounts.**

6 A. Full amortization of the \$52,240 in deferred intervenor funding amounts will occur on
7 May 31, 2020. Idaho Power is proposing to begin amortization and collection in rates
8 of \$37,383 in intervenor funding amounts accrued since the Company's last request,
9 beginning June 1, 2020.

10 **Q. Please explain what makes up the balances of the \$37,383 in intervenor funding**
11 **deferrals.**

12 A. Since the Company's last request to begin amortization of intervenor funding amounts,
13 Idaho Power has recorded \$33,500 in deferrals associated with payments made to
14 intervenors. In addition, Idaho Power has deferred \$3,883 in interest accrued on
15 current deferrals. Exhibit 105 details the intervenor funding deferrals by docket and
16 order number and interest amounts accrued.

17 **Q. What is Idaho Power's proposal with respect to deferred start-up expenses**
18 **associated with the Company's participation in the EIM?**

19 A. Order Nos. 17-215 and 18-137 issued in Docket No. UM 1821, authorized the
20 Company to defer incremental expenses associated with entrance into the EIM. Start-
21 up expenses were deferred up until Idaho Power's participation in the market began,
22 or April 2018. The Company is proposing to begin amortization of the EIM O&M start-
23 up expense deferral beginning June 1, 2020.

24 **Q. What is the balance of the EIM O&M start-up expense deferral?**

25 A. Idaho Power estimates \$39,256 in deferred EIM O&M start-up expenses, including
26 interest as of May 31, 2020.

1 **Q. The deferred accounting statute (ORS 757.259) allows the Company to recover**
2 **6 percent of Idaho Power's gross revenue in Oregon for the preceding calendar**
3 **year. Has Idaho Power calculated the amount the Company is eligible to recover**
4 **annually?**

5 A. Yes. As detailed in Exhibit 106, for the 12-months ended December 31, 2019, the
6 Company received \$51.99 million in gross revenues from its Oregon customers and is
7 therefore eligible to recover up to \$3,119,450 per year. Because the total of the
8 combined deferred amounts is well below the amount the Company is eligible to collect
9 per year, Idaho Power is proposing to collect the intervenor funding and EIM O&M
10 start-up expense deferrals over the June 1, 2020, to May 31, 2021, time period.

11 **Q. Section 5 of the deferral statute (ORS 757.259(5)) requires an earnings review**
12 **prior to amortization of a deferral. Has Idaho Power performed an earnings test**
13 **regarding these amounts?**

14 A. Yes. Although, Section 4 of the deferral statute and the 2016-2020 Intervenor Funding
15 Agreement between Idaho Power and the Oregon Citizens' Utility Board approved by
16 the Commission¹ explicitly exempts intervenor funding expenses from the earnings
17 review requirement,² the Company has performed an earnings test applicable only to
18 deferred EIM O&M start-up expenses and pursuant to ORS 757.259(4). Oregon
19 Administrative Rules require that the Company provide the Commission an earnings
20 review for the 12-month period or for multiple 12-month periods that encompass all or
21 part of the period during which the deferral took place. The Company previously
22 performed an earnings test based on the 2017 and 2018 Oregon Results of Operations

23
24 ¹ Order No. 16-028

25 ² Section 3 of the deferral statute allows for the deferral of amounts provided as financial
26 assistance under the intervenor funding statute (ORS 757.072). Section 4 of the deferral statute
provides that amounts deferred under Section 3 are not subject to the earnings test contained in
Section 5.

1 (see Exhibits 107 and 108, respectively), the periods for which the EIM O&M start-up
2 expenses were deferred. In the time since the earnings test was performed, no
3 additional information regarding the deferred EIM O&M start-up expenses has come
4 to light to suggest that the prior earnings tests are no longer valid.

5 **Q. Do the earnings tests for 2017 and 2018 demonstrate that Idaho Power's**
6 **earnings during the deferral period did not exceed levels authorized by the**
7 **Commission?**

8 A. The 2017 earnings test demonstrates that Idaho Power's earnings during 2017 did not
9 exceed levels authorized by the Commission. However, the Company's 2018 earnings
10 were above the authorized rate of return of 7.757 percent. Therefore, Idaho Power is
11 only eligible to recover EIM O&M start-up expenses incurred during 2017.

12 **Q. What is the balance of the EIM O&M start-up expense deferral that the Company**
13 **is proposing to amortize June 1, 2020?**

14 A. Removing 2018 EIM O&M start-up expenses from the total deferred amounts results
15 in a balance of \$23,842. Exhibit 109 presents the deferred amounts and carrying
16 charges by month since commencement of the deferral on March 8, 2017.

17 **Q. What is the impact on rates based on the credit in the True-Up Balancing**
18 **Account, the updated level of amortization collection associated with intervenor**
19 **funding amounts, and the amortization collection associated with EIM O&M**
20 **start-up expenses?**

21 A. The Company is currently providing 2018 REC sales proceeds to all customers and
22 collecting amortization associated with intervenor funding deferrals from residential
23 customers through Schedule 56. Idaho Power is proposing to continue providing REC
24 sales proceeds to all customer classes through Schedule 56 while also collecting
25 deferred intervenor funding amounts from residential customers and deferred 2017
26 EIM O&M start-up expenses from all customer classes through Schedule 56. Using

1 the forecasted June 1, 2020, to May 31, 2021, normalized Oregon jurisdictional sales
2 of 696,508,751 for all customer classes, the resulting rate associated with the credit in
3 the True-Up Balancing Account and the collection of EIM O&M start-up expenses is
4 (0.0310) cents per kilowatt-hour (“kWh”). The same test period includes a total of
5 182,860,882 in Oregon residential jurisdictional sales, resulting in a rate associated
6 with the intervenor funding deferrals of 0.0204 cents per kWh. The detailed
7 calculations of the rate impact can be found in Exhibit 107. Table 1 summarizes the
8 impact on the rates associated with Idaho Power’s proposal.

9 **Table 1**

10 Customer Class	Current (cents per kWh)	Proposed (cents per kWh)
11 Residential service	0.0098	(0.0106)
12 All other	(0.0187)	(0.0310)

13 **Q. Has Idaho Power updated Schedule 56 with the proposed rates?**

14 A. No. Because the Oregon allocation factor in the 2019 ROO may be different than the
15 Oregon allocation factor from the 2018 ROO, the total Oregon jurisdictional customer
16 benefit of REC sales made in 2019 may change. Idaho Power will file an update to
17 Schedule 56 when it files its 2019 ROO in April 2020.

18 **Q. Does this conclude your testimony?**

19 A. Yes, it does.
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Idaho Power/101
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 101
2019 PCAM

February 2020

2019 PCAM
 Twelve Months Ended December 31, 2019

Idaho Power/101
 Waites/1

OREGON PCAM (Schedule 56)													
ACTUAL POWER COSTS													
	January	January YTD	February	February YTD	March	March YTD	April	April YTD	May	May YTD	June	June YTD	
Actual NPSE Costs													
Actual Sales - Includes Unbilled	MWh	1,214,558	1,214,558	1,089,565	2,304,123	1,066,911	3,371,034	958,297	4,329,331	1,098,732	5,428,063	1,351,482	6,779,545
Fuel	\$	16,278,430.09	16,278,430.09	18,710,670.11	34,989,100.20	16,881,367.02	51,870,467.22	7,017,043.91	58,887,511.13	5,200,890.68	64,088,401.81	8,607,904.06	72,696,305.87
Purchased Power	\$	7,565,041.82	7,565,041.82	8,258,943.57	15,823,985.39	5,551,038.83	21,375,024.22	2,938,422.88	24,313,447.10	3,598,460.32	27,911,907.42	4,670,544.41	32,582,451.83
Oregon Solar Pilot	\$	743.36	743.36	655.33	1,398.69	614.52	2,013.21	1,621.19	3,634.40	1,560.39	5,194.79	2,052.64	7,247.43
Surplus Sales	\$	(3,417,237.93)	(3,417,237.93)	(22,872,937.56)	(26,290,175.47)	(23,643,569.71)	(49,933,744.18)	(9,042,970.90)	(58,976,715.08)	(3,198,100.10)	(62,174,815.18)	(4,330,434.90)	(66,505,250.08)
Total Non-QF	\$	20,426,977.34	20,426,977.34	4,097,331.47	24,524,308.81	(1,210,548.34)	23,313,760.47	914,117.08	24,227,877.55	5,602,811.29	29,830,688.84	8,950,066.21	38,780,755.05
QF - Includes Net Metering and Liquidated Damages	\$	16,671,655.54	16,671,655.54	14,530,939.03	31,202,594.57	11,789,356.14	42,991,950.71	16,941,066.80	59,933,017.51	18,050,679.48	77,983,696.99	23,700,861.85	101,684,558.84
Total Actual Power Costs Incurred	\$	37,098,632.88	37,098,632.88	18,628,270.50	55,726,903.38	10,578,807.80	66,305,711.18	17,855,183.88	84,160,895.06	23,653,490.77	107,814,385.83	32,650,928.06	140,465,313.89
Actual Power Cost per Unit	\$/MWh	\$30.54	\$30.54	\$17.10	\$24.19	\$9.92	\$19.67	\$18.63	\$19.44	\$21.53	\$19.86	\$24.16	\$20.72
POWER COSTS COLLECTED IN RATES													
Actual Sales	MWh	1,214,558	1,214,558	1,089,565	2,304,123	1,066,911	3,371,034	958,297	4,329,331	1,098,732	5,428,063	1,351,482	6,779,545
Combined Rate (Recoverd in Rates)	\$/MWh	\$ 25.54	\$ 25.54	\$ 26.10	\$ 25.80	\$ 26.10	\$ 25.90	\$ 25.36	\$ 25.78	\$ 25.39	\$ 25.70	\$ 25.56	\$ 25.87
Total Power Costs Collected in Rates	\$	31,019,811.32	31,019,811.32	28,437,646.50	59,457,457.82	27,846,377.10	87,303,834.92	24,302,411.92	111,606,246.84	27,896,805.48	139,503,052.32	35,895,361.92	175,398,414.24
CHANGE FROM FORECAST													
Actual Power Cost per Unit	\$/MWh	\$30.54	\$30.54	\$17.10	\$24.19	\$9.92	\$19.67	\$18.63	\$19.44	\$21.53	\$19.86	\$24.16	\$20.72
Combined Rate (Recoverd in Rates)	\$/MWh	\$25.54	\$25.54	\$26.10	\$25.80	\$26.10	\$25.90	\$25.36	\$25.78	\$25.39	\$25.70	\$25.56	\$25.87
Actual Increase (Decrease) Over Forecast Rate	\$/MWh	\$5.00	\$5.00	(\$9.00)	(\$1.62)	(\$16.18)	(\$6.23)	(\$6.73)	(\$6.34)	(\$3.86)	(\$5.84)	(\$2.40)	(\$5.15)
Deviation from Forecast	\$	6,078,821.56	6,078,821.56	(9,809,376.00)	(3,730,554.44)	(17,267,569.30)	(20,998,123.74)	(6,447,228.04)	(27,445,351.78)	(4,243,314.71)	(31,688,666.49)	(3,244,433.86)	(34,933,100.35)
Oregon Allocation	%		4.63%		4.63%		4.63%		4.63%		4.63%		4.63%
Oregon Allocated Power Cost Deviation (before DB)	\$		281,449.44		(172,724.67)		(972,213.13)		(1,270,719.79)		(1,467,185.26)		(1,617,402.55)
Deadband - Over 250 Basis Points	\$		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69
Deadband - Under 125 Basis Points	\$		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)
True-Up (+)	\$		0.00		0.00		0.00		0.00		0.00		0.00
True-Up (-)	\$		0.00		0.00		0.00		0.00		(175,041.92)		(325,259.21)
OREGON DEFERRAL before sharing	\$		0.00		0.00		0.00		0.00		(175,041.92)		(325,259.21)
Portion of True-up Change Allowed	%		90%		90%		90%		90%		90%		90%
OREGON DEFERRAL w/ SHARING (90/10)	\$		0.00		0.00		0.00		0.00		(157,537.73)		(292,733.29)
Interest Rate	%		7.757%		7.757%		7.757%		7.757%		7.757%		7.757%
Interest Accrued to date	\$		-		-		-		-		(2,545.88)		(5,676.83)
Total Deferred Balance	\$		-		-		-		-		(160,083.60)		(298,410.12)

2019 PCAM
 Twelve Months Ended December 31, 2019

OREGON PCAM (Schedule 56)													Annual	
ACTUAL POWER COSTS														
	July	July YTD	August	August YTD	September	September YTD	October	October YTD	November	November YTD	December	December YTD	Annual	
Actual NPSE Costs														
Actual Sales - Includes Unbilled	MWh	1,636,491	8,416,036	1,591,774	10,007,810	1,165,594	11,173,404	1,069,004	12,242,408	1,085,415	13,327,823	1,208,888	14,536,711	14,536,711
Fuel	\$	15,954,351.83	88,650,657.70	18,918,359.80	107,569,017.50	12,007,830.48	119,576,847.98	10,784,498.64	130,361,346.62	12,378,199.59	142,739,546.21	14,132,561.75	156,872,107.96	156,872,107.96
Purchased Power	\$	8,762,855.73	41,345,307.56	9,857,817.94	51,203,125.50	8,125,865.44	59,328,990.94	8,000,828.04	67,329,818.98	8,797,534.49	76,127,353.47	9,834,986.15	85,962,339.62	85,962,339.62
Oregon Solar Pilot	\$	8,539.14	15,786.57	6,039.42	21,825.99	5,535.66	27,361.65	2,680.18	30,041.83	1,618.88	31,660.71	1,130.37	32,791.08	32,791.08
Surplus Sales	\$	(2,037,183.49)	(69,542,433.57)	(5,997,405.35)	(74,539,839.12)	(8,436,882.14)	(82,976,521.26)	(2,496,580.22)	(85,473,011.48)	(2,587,737.42)	(88,060,938.90)	(3,869,159.16)	(91,929,098.06)	(91,929,098.06)
Total Non-QF	\$	22,688,563.21	61,469,318.26	22,784,811.61	94,254,129.87	11,702,548.44	95,956,679.31	16,291,426.64	112,246,105.35	18,589,615.54	130,837,721.49	20,100,519.09	150,938,240.58	150,938,240.58
QF - Includes Net Metering and Liquidated Damages	\$	24,880,120.14	126,564,678.98	24,543,219.63	151,107,898.61	19,097,359.71	170,205,258.32	17,854,720.02	188,059,978.34	13,092,577.56	201,152,555.90	15,335,030.22	216,487,586.12	216,487,586.12
Total Actual Power Costs Incurred	\$	47,568,683.35	186,033,997.24	47,328,031.24	235,362,028.48	30,799,909.15	266,161,937.63	34,146,146.66	300,308,084.29	31,682,193.10	331,990,277.39	35,435,549.31	367,425,826.70	367,425,826.70
Actual Power Cost per Unit	\$/MWh	\$29.07	\$22.34	\$29.73	\$23.52	\$26.42	\$23.82	\$31.94	\$24.53	\$29.19	\$24.91	\$29.31	\$25.28	\$25.28
POWER COSTS COLLECTED IN RATES														
Actual Sales	MWh	1,636,491	8,416,036	1,591,774	10,007,810	1,165,594	11,173,404	1,069,004	12,242,408	1,085,415	13,327,823	1,208,888	14,536,711	14,536,711
Combined Rate (Recoverd in Rates)	\$/MWh	\$ 26.77	\$26.95	\$ 26.90	\$26.18	\$ 26.74	\$26.24	\$ 26.59	\$26.27	\$ 26.57	\$26.30	\$ 26.63	\$26.32	\$26.32
Total Power Costs Collected in Rates	\$	43,808,864.07	219,207,278.31	42,818,720.60	262,025,998.91	31,167,983.56	293,193,982.47	28,424,816.36	321,618,798.83	28,839,476.55	350,458,275.38	32,192,687.44	382,650,962.82	382,650,962.82
CHANGE FROM FORECAST														
Actual Power Cost per Unit	\$/MWh	\$29.07	\$22.34	\$29.73	\$23.52	\$26.42	\$23.82	\$31.94	\$24.53	\$29.19	\$24.91	\$29.31	\$25.28	\$25.28
Combined Rate (Recoverd in Rates)	\$/MWh	\$26.77	\$26.95	\$26.90	\$26.18	\$26.74	\$26.24	\$26.59	\$26.27	\$26.57	\$26.30	\$26.63	\$26.32	\$26.32
Actual Increase (Decrease) Over Forecast Rate	\$/MWh	\$2.30	(\$3.70)	\$2.83	(\$2.66)	(\$0.32)	(\$2.42)	\$5.35	(\$1.74)	\$2.62	(\$1.39)	\$2.68	(\$1.05)	(\$1.05)
Deviation from Forecast	\$	3,759,819.28	(31,173,281.07)	4,509,310.64	(26,663,970.43)	(368,074.41)	(27,032,044.84)	5,721,330.30	(21,310,714.54)	2,842,716.55	(18,467,997.99)	3,242,861.87	(15,225,136.12)	(15,225,136.12)
Oregon Allocation	%		4.63%		4.63%		4.63%		4.63%		4.63%		4.63%	4.63%
Oregon Allocated Power Cost Deviation (before DB)	\$		(1,443,322.91)		(1,234,541.83)		(1,251,583.68)		(986,686.08)		(855,068.31)		(704,923.80)	(704,923.80)
Deadband - Over 250 Basis Points	\$		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69		2,584,286.69	2,584,286.69
Deadband - Under 125 Basis Points	\$		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)		(1,292,143.34)	(1,292,143.34)
True-Up (+)	\$		0.00		0.00		0.00		0.00		0.00		0.00	0.00
True-Up (-)	\$		(151,179.57)		0.00		0.00		0.00		0.00		0.00	0.00
OREGON DEFERRAL before sharing	\$		(151,179.57)		0.00		0.00		0.00		0.00		0.00	0.00
Portion of True-up Change Allowed	%		90%		90%		90%		90%		90%		90%	90%
OREGON DEFERRAL w/ SHARING (90/10)	\$		(136,061.62)		0.00		0.00		0.00		0.00		0.00	0.00
Interest Rate	%		7.75%		7.75%		7.75%		7.75%		7.75%		7.75%	7.75%
Interest Accrued to date	\$		(3,078.34)		-		-		-		-		-	-
Total Deferred Balance	\$		(139,139.95)		-		-		-		-		-	-

Idaho Power/101
 Waites/2

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 102
PCAM Deadband Calculation

February 2020

**Determination of Oregon PCAM Deadbands
Based on Idaho Power 2018 Results of Operations**

	(A)	(B)
	Total System	Oregon
(1) Rate Base	\$3,363,070,908	\$140,969,719
(2) % Equity in cap structure	54.454%	54.454%
(3) Equity in rate base	\$1,831,326,632	\$76,763,651
(4) 100 basis points	1.000%	1.000%
(5) Resulting return (NOI Effect)	\$18,313,266	\$767,637
(6) Net-to Gross Factor	1.347	1.347
(7) Revenue requirement	\$24,661,011	\$ 1,033,715
(8) Upper Band of Basis Points	250	\$2,584,286.69
(9) Lower Band of Basis Points	125	(\$1,292,143.34)

Idaho Power/103
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 103
2019 REC Sales

February 2020

Idaho Power/104
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 104
EIM O&M Expense Variance

February 2020

ENERGY IMBALANCE MARKET OPERATION AND MAINTENANCE EXPENSES

				<u>2019 APCU</u>		<u>2019 ACTUALS</u>	
				<u>SYSTEM</u>	<u>OREGON RETAIL</u>	<u>SYSTEM</u>	<u>OREGON RETAIL</u>
TABLE 5-OPERATION & MAINTENANCE EXPENSES							
557 / OTHER EXPENSES - PCA/ EPC ACCOUID10		4.334%		172,100	7,458	545,974	23,660
560 / SUPERVISION & ENGINEERING	L 160	4.334%		173,713	7,528	286,075	12,397
561 / LOAD DISPATCHING	D12	4.334%		47,321	2,051	86,027	3,728
569 / STRUCTURES	L 133	4.334%		-	-	82,420	3,572
575 / TRANS MKT ADMIN-EIM	L 160	4.334%		344,342	14,922	611,254	26,489
920 / ADMINISTRATIVE & GENERAL SALARIE LABOF		4.590%		37,026	1,700	54,959	2,523
921 / OFFICE SUPPLIES	LABOF	4.590%		18,328	841	10,367	476
923 / OUTSIDE SERVICES	LABOF	4.590%		(4,678)	(215)	1,301	60
924 / PROPERTY INSURANCE							
PRODUCTION - STEAM	D10	4.287%		3,360	144	3,360	144
TOTAL OPER & MAINT EXPENSE				791,513	34,429	1,681,737	73,048
						VARIANCE	38,619

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 105
Intervenor Funding Deferrals

February 2020

IDAHO POWER COMPANY				
Docket/Order No.	Order Date	Recorded Date	Fund Type	Amount
UE 350/19-143	4/23/2019	5/31/2019	Issue Fund	\$ 2,000.00
UM 1757/20-005	1/8/2020	1/31/2020	Fund Grant	31,500.00
CARRYING CHARGES				3,883.30
BALANCE				\$ 37,383.30

Idaho Power/106
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 106
Schedule 56 Rates

February 2020

Oregon

	12 MOS ENDED DEC 2019	
Total Revenues	\$	51,990,825
		6%
Deferral Revenues Allowed	\$	3,119,450

True-Up Balancing Account

Oregon kWh Forecast ¹		696,508,751
Rate (cents per kWh)		(0.0344)
Estimated Collection (Refund)	\$	(239,890)

Intervenor Funding deferrals

Oregon Residential kWh Forecast ¹		182,860,882
Rate (cents per kWh)		0.0204
Estimated Collection (Refund)	\$	37,383

EIM O&M Start-Up Expense deferral

Oregon kWh Forecast ¹		696,508,751
Rate (cents per kWh)		0.0034
Estimated Collection (Refund)	\$	23,842

Total Rate - Residential Service (cents per kWh)		(0.0106)
Total Rate - All Other (cents per kWh)		(0.0310)

1. June 1, 2020 - May, 31, 2021 test year.

Idaho Power/107
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 107
2017 Earnings Test

February 2020

**IDAHO POWER COMPANY
STATEMENT OF OPERATIONS
FOR THE TWELVE MONTHS ENDED DECEMBER 31, 2017**

OPUC JURISDICTION

DESCRIPTION	ACTUAL ALLOCATION	TYPE I ADJUSTMENTS	ADJUSTED TOTAL - TYPE I	TYPE II ADJUSTMENTS	ADJUSTED TOTAL - TYPE I & II
OPERATING REVENUES					
Retail Sales Revenues	53,834,005	0	53,834,005	(329,515)	53,504,490
Sales for Resale	0	0	0	0	0
Opportunity Sales	1,549,531	0	1,549,531	217,971	1,767,502
Other Operating Revenues	4,780,731	(1,967,325)	2,813,405	(10,246)	2,803,160
Total Operating Revenue	60,164,266	(1,967,325)	58,196,940	(121,789)	58,075,151
OPERATING EXPENSES					
Operation & Maintenance Expense	38,604,782	(1,553,266)	37,051,516	(1,703,174)	35,348,342
Depreciation Expense	6,690,627	0	6,690,627	(162,194)	6,528,434
Amortization Expense	263,039	4,182	267,221	(7,002)	260,219
Accretion Expense	9,829	0	9,829	0	9,829
Taxes Other Than Income Taxes	2,417,344	0	2,417,344	(10,738)	2,406,606
Regulatory Debits/Credits	1,003,154	0	1,003,154	0	1,003,154
Provision for Deferred Income Taxes	(922,500)	1,132,694	210,194	45,107	255,301
Investment Tax Credit Adjustment	319,560	0	319,560	(1,172)	318,387
Federal Income Tax	1,236,678	(709,266)	527,412	355,608	883,019
State Income Taxes	335,549	(313,309)	22,240	54,658	76,898
Total Operating Expenses	49,958,062	(1,438,966)	48,519,097	(1,428,906)	47,090,191
OPERATING NET INCOME	10,206,203	(528,360)	9,677,844	1,307,116	10,984,960
Add: IERCO Operating Income	328,736	0	328,736	(1,629)	327,107
CONSOLIDATED OPERATING INCOME	10,534,940	(528,360)	10,006,580	1,305,487	11,312,067
RATE OF RETURN EARNED	7.342%		7.031%		7.978%
IMPLIED RETURN ON EQUITY	9.121%		8.549%		10.289%

COST OF CAPITAL - DEC 31, 2017

	ACTUAL STRUCTURE	EMBEDDED COST	WEIGHTED COST
Long Term Debt	45.546%	5.215%	2.375%
Preferred Stock	0.000%	0.000%	0.000%
Common Equity	54.454%	9.900%	5.391%
Total	100.000%		7.766%

Idaho Power/108
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE ____

IDAHO POWER COMPANY

Exhibit 108
2018 Earnings Test

February 2020

**IDAHO POWER COMPANY
STATEMENT OF OPERATIONS
FOR THE TWELVE MONTHS ENDED DECEMBER 31, 2018**

OPUC JURISDICTION

DESCRIPTION	ACTUAL ALLOCATION	TYPE I ADJUSTMENTS	ADJUSTED TOTAL - TYPE I	TYPE II ADJUSTMENTS	ADJUSTED TOTAL - TYPE I & II
OPERATING REVENUES					
Retail Sales Revenues	55,160,426	0	55,160,426	(211,954)	54,948,472
Sales for Resale	0	0	0	0	0
Opportunity Sales	3,665,888	0	3,665,888	(2,011,300)	1,654,589
Other Operating Revenues	5,009,802	(1,855,958)	3,153,844	13,598	3,167,442
Total Operating Revenue	63,836,116	(1,855,958)	61,980,158	(2,209,655)	59,770,503
OPERATING EXPENSES					
Operation & Maintenance Expense	39,651,680	(1,758,873)	37,892,807	(1,577,574)	36,315,234
Depreciation Expense	6,553,174	0	6,553,174	238,948	6,792,122
Amortization Expense	282,643	6,355	288,998	(12,811)	276,187
Accretion Expense	10,126	0	10,126	0	10,126
Taxes Other Than Income Taxes	2,384,232	(0)	2,384,232	(7,081)	2,377,152
Regulatory Debits/Credits	219,223	0	219,223	0	219,223
Provision for Deferred Income Taxes	(231,826)	(244,045)	(475,871)	42,891	(432,980)
Investment Tax Credit Adjustment	224,976	0	224,976	971	225,948
Federal Income Tax	1,020,417	384,891	1,405,308	(735,475)	669,833
State Income Taxes	(3,594)	232,743	229,148	(163,254)	65,894
Total Operating Expenses	50,111,052	(1,378,930)	48,732,122	(2,213,384)	46,518,738
OPERATING NET INCOME	13,725,065	(477,029)	13,248,036	3,729	13,251,765
Add: IERCO Operating Income	408,183	0	408,183	1,397	409,581
CONSOLIDATED OPERATING INCOME	14,133,248	(477,029)	13,656,219	5,126	13,661,346
RATE OF RETURN EARNED	9.943%		9.687%		9.660%
IMPLIED RETURN ON EQUITY	13.927%		13.458%		13.408%

COST OF CAPITAL - DEC 31, 2018

	ACTUAL STRUCTURE	EMBEDDED COST	WEIGHTED COST
Long Term Debt	45.546%	5.179%	2.359%
Preferred Stock	0.000%	0.000%	0.000%
Common Equity	54.454%	9.900%	5.391%
Total	100.000%		7.750%

Idaho Power/109
Witness: Courtney Waites

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE _____

IDAHO POWER COMPANY

Exhibit 109
EIM O&M Start-Up Expense Deferral

February 2020

IDAHO POWER COMPANY
 EIM Deferral Oregon
 OPUC Order 17-215

MONTH	BEGINNING	ENDING	AVERAGE	Deposit	CARRYING	CUMULATIVE
	<u>BALANCE</u>	<u>BALANCE</u>	<u>BALANCE</u>	<u>Rate</u>	<u>CHARGES</u>	<u>INTEREST CHARGES</u>
September	0.00	7,639.51	3,819.76	7.757%	24.69	24.69
October	7,639.51	8,053.11	7,846.31	7.757%	50.72	75.41
November	8,053.11	18,331.29	13,192.20	7.757%	85.28	160.69
December	18,331.29	19,667.69	18,999.49	7.757%	122.82	283.51
Jan, 2018	19,667.69	19,790.51	19,729.10	7.757%	127.53	411.04
February	19,790.51	19,918.04	19,854.28	7.757%	128.34	539.38
March	19,918.04	20,046.38	19,982.21	7.757%	129.17	668.55
April	20,046.38	20,175.55	20,110.97	7.757%	130.00	798.55
May	20,175.55	20,305.55	20,240.55	7.757%	130.84	929.39
June	20,305.55	20,436.39	20,370.97	7.757%	131.68	1,061.07
July	20,436.39	20,568.07	20,502.23	7.757%	132.53	1,193.60
August	20,568.07	20,700.60	20,634.34	7.757%	133.38	1,326.98
September	20,700.60	20,833.98	20,767.29	7.757%	134.24	1,461.22
October	20,833.98	20,968.22	20,901.10	7.757%	135.11	1,596.33
November	20,968.22	21,103.33	21,035.78	7.757%	135.98	1,732.31
December	21,103.33	21,239.31	21,171.32	7.757%	136.85	1,869.16
Jan, 2019	21,239.31	21,376.16	21,307.74	7.757%	137.74	2,006.90
February	21,376.16	21,513.90	21,445.03	7.757%	138.62	2,145.52
March	21,513.90	21,652.52	21,583.21	7.757%	139.52	2,285.04
April	21,652.52	21,792.04	21,722.28	7.757%	140.42	2,425.46
May	21,792.04	21,932.46	21,862.25	7.757%	141.32	2,566.78
June	21,932.46	22,073.78	22,003.12	7.757%	142.23	2,709.01
July	22,073.78	22,216.01	22,144.90	7.757%	143.15	2,852.16
August	22,216.01	22,359.16	22,287.59	7.757%	144.07	2,996.23
September	22,359.16	22,503.23	22,431.20	7.757%	145.00	3,141.23
October	22,503.23	22,648.23	22,575.73	7.757%	145.93	3,287.16
November	22,648.23	22,794.16	22,721.20	7.757%	146.87	3,434.03
December	22,794.16	22,941.03	22,867.60	7.757%	147.82	3,581.85
Jan, 2020	22,941.03	23,088.85	23,014.94	7.757%	148.77	3,730.62
February	23,088.85	23,237.62	23,163.24	7.757%	149.73	3,880.35
March	23,237.62	23,387.35	23,312.49	7.757%	150.70	4,031.05
April	23,387.35	23,538.05	23,462.70	7.757%	151.67	4,182.72
May	23,538.05	23,689.72	23,613.89	7.757%	152.64	4,335.36
	23,689.72	23,842.36				

CERTIFICATE OF SERVICE

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

UE 354 Service List

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DATED: February 25, 2020



Alisha Till
Paralegal