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October 31, 2019

VIA ELECTRONIC AND US MAIL

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

Re: UE ___ – Idaho Power Company's 2020 Annual Power Cost Update (APCU).

Attention Filing Center:

Enclosed for filing in the above-referenced matter are an original and five copies of Idaho Power Company's Direct Testimony and Exhibits of Nicole A. Blackwell (Idaho Power/100-110). Please direct all communications in this matter to:

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An electronic copy of this filing has been served on all parties of the 2019 APCU (UE 350).

Sincerely,

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

Alisha Till
Paralegal

Enclosures
cc: UE 350 Service List

Idaho Power/100
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE ____

IN THE MATTER OF IDAHO POWER)
COMPANY'S 2020 ANNUAL POWER)
COST UPDATE)
OCTOBER UPDATE)

)

IDAHO POWER COMPANY
DIRECT TESTIMONY
OF
NICOLE A. BLACKWELL

October 31, 2019

- 1 **Q. Please state your name, business address, and present occupation.**
- 2 A. My name is Nicole A. Blackwell. I am employed by Idaho Power Company ("Idaho
3 Power" or "Company") as a Regulatory Analyst in the Regulatory Affairs Department.
4 My business address is 1221 West Idaho Street, Boise, Idaho 83702.
- 5 **Q. Please describe your educational background.**
- 6 A. In May 2010, I received Bachelor of Science degrees in Finance and Economics from
7 the University of Idaho. I have also attended "The Basics: Practical Regulatory
8 Training for the Electric Industry," an electric utility ratemaking course offered through
9 New Mexico State University's Center for Public Utilities, "Electric Utility Fundamentals
10 & Insights," an electric utility course offered through the Western Energy Institute, and
11 Edison Electric Institute's "Electric Rates Advanced Course."
- 12 **Q. Please describe your business experience with Idaho Power.**
- 13 A. In January 2016, I accepted my current position at Idaho Power as a Regulatory
14 Analyst in the Regulatory Affairs Department. As a Regulatory Analyst, I am
15 responsible for running the AURORA model ("AURORA") to calculate net power
16 supply expenses ("NPSE") for ratemaking purposes, as well as the determination of
17 the marginal cost of energy used in the Company's marginal cost analyses. My duties
18 also include providing analytical support for other regulatory activities within the
19 Regulatory Affairs Department.
- 20 **Q. What is the purpose of your testimony in this proceeding?**
- 21 A. The purpose of my testimony is to present the determination of the Company's 2020
22 October Update, the first portion of the Company's Annual Power Cost Update
23 ("APCU"). If approved, the 2020 October Update will result in a revenue decrease of
24 \$176,943, or 0.32 percent, to become effective June 1, 2020.
- 25 **Q. How is your testimony organized?**
- 26

1 A. My testimony begins with a brief history of the APCU and the filing requirements
2 associated with it. Next, my testimony describes the required updates to AURORA
3 and the resulting modeling outputs. I then present and discuss the total NPSE for the
4 2020 October Update, and how it compares to last year's 2019 October Update. My
5 testimony concludes with the quantification of the projected revenue requirement and
6 the proposed rate implementation to recover the revenue requirement.

7 **Q. Have you prepared exhibits for this proceeding?**

8 A. Yes. I am sponsoring the following exhibits:

- 9 1. Exhibit 101, AURORA modeled determination of normalized power supply
10 expenses for April 1, 2020 – March 31, 2021
- 11 2. Exhibits 102 – 104, Mid-Columbia Forward Price Curves Discounted for Inflation,
12 Producer Price Index for Electric Power, and Forward Prices Used for Re-Pricing
13 Purchased Power and Surplus Sales
- 14 3. Exhibit 105, Total Normalized Base Power Supply Expenses for the 2020 October
15 Update
- 16 4. Exhibit 106, Energy Imbalance Market Benefits
- 17 5. Exhibit 107, Energy Imbalance Market Costs
- 18 6. Exhibit 108, Year-Over-Year Differences in Modeled NPSE
- 19 7. Exhibit 109, Revenue Spread
- 20 8. Exhibit 110, Revenue Impact

21 **APCU Overview**

22 **Q. What is the APCU?**

- 23 A. The APCU is a rate mechanism that is comprised of two components, an October
24 Update and a March Forecast. The October Update establishes the prospective
25 “base” or “normal” power supply expenses for an April through March test period. The
26 March Forecast is a forecast of expected power supply expenses over the same test

1 period as the October Update. “Base” or “normal” power supply expenses are
2 calculated by modeling the test period under multiple historical water conditions; in this
3 case, the Company modeled 91 historical water conditions (1928-2018). Expected
4 power supply expenses are calculated by modeling the same test period as the
5 October Update, except the power supply expenses are calculated by modeling a
6 single forecast water condition from the Northwest River Forecast Center. The results
7 of the October Update are reflected as an update to base rates and the results of the
8 March Forecast are reflected in the March Forecast Rate Adjustment listed in
9 Schedule 55, with both of the rate adjustments going into effect on June 1st of each
10 year.

11 **Q. What is the definition of the term “net power supply expense” as the Company
12 and the Public Utility Commission of Oregon (“Commission”) have used the
13 term historically?**

14 A. The Company and the Commission have used the term “net power supply expense”
15 to refer to the sum of the following Federal Energy Regulatory Commission (“FERC”)
16 accounts: fuel expense (FERC Accounts 501 and 547), and purchased power
17 expenses (FERC Account 555), minus surplus sales revenues (FERC Account 447).

18 **Q. What regulatory actions led to the implementation of the APCU?**

19 A. In its Order issued in Idaho Power’s rate case, Docket No. UE 167, the Commission
20 specifically recognized the Company’s unique reliance on hydro generation and its
21 extended amortization of deferred costs, and therefore, directed the parties to work
22 together to “consider whether there is a more effective regulatory mechanism for Idaho
23 Power to recover its allowable power costs.” (Order No. 05-871, p. 7). Following that
24 Order, the Company filed its request for a power cost adjustment mechanism
25 (“PCAM”). The result of that filing was a settlement stipulation approved by the
26

1 Commission in Order No. 08-238, Docket No. UE 195, establishing the APCU and
2 implementation of the PCAM, or the annual power supply expense true-up.

3 **Q. What is the purpose of the APCU?**

4 A. The APCU was implemented to adjust rates on an annual basis to capture variability
5 in power supply expenses that occur with a predominantly hydro-based generation
6 fleet. The APCU mechanism closely aligns the power supply expenses included in
7 customer rates with the power supply expenses actually incurred by the Company.
8 Prior to the APCU, the Company would defer excess power supply expenses and then
9 amortize them at a later time for collection, which led to multiple deferrals and long
10 amortization periods.

11 Q. **What are the requirements of Order No. 08-238?**

12 A. Order No. 08-238 directed the Company to model its power supply expenses using
13 the AURORA model and identified a number of variables that were to be updated
14 annually in AURORA. The specific variables are discussed in the following section.

15 Q. **What is the AURORA model?**

16 A. The AURORA model is a comprehensive electric resource dispatch model that
17 simulates the economic dispatch of the Company's resources to determine NPSE for
18 the APCU. The Commission has also accepted the use of AURORA to determine
19 NPSE for general rate cases, marginal cost analyses, and resource modeling for the
20 Company's Integrated Resource Plan.

21 **AURORA Model Inputs and Modeling Results**

22 Q. **What are the specific variables that are to be updated during each APCU filing?**

23 A. Commission Order No. 08-238 identified the following power supply expense variables
24 to be updated annually:
25 a. Fuel prices and transportation costs
26 b. Wheeling expenses

- 1 c. Planned outages and forced outage rates
- 2 d. Heat rates
- 3 e. Forecast of normalized load and normalized sales
- 4 f. Contracts for wholesale power and power purchases and sales
- 5 g. Forward price curve
- 6 h. Public Utility Regulatory Policies Act of 1978 (“PURPA”) contract expenses
- 7 i. The Oregon state allocation factor

The Company reviewed all the inputs and updated those that have changed since last year’s October Update, as described in more detail in the following section.

Coal Fuel Expense

Q. Have any changes in coal fuel expense and coal-fired generation occurred since last year’s October Update filing?

A. Yes. Total coal fuel expense included in the 2020 October Update is \$40.8 million, compared to \$65.2 million in the 2019 October Update, a decrease of 37 percent. Coal-fired generation also decreased from last year’s October Update, from 1.78 million megawatt-hours (“MWh”) to 1.05 million MWh, or approximately 41 percent. Production volumes at the Jim Bridger plant (“Bridger”), the Boardman plant (“Boardman”) and the North Valmy plant (“Valmy”) decreased 34 percent, 54 percent, and 51 percent respectively, compared with the 2019 October Update.

Q. Why have production volumes decreased at the coal-fired plants?

A. The decrease in forecast generation at Bridger is attributable to the availability of lower-priced market power purchases and fewer economic surplus sales. The decrease in generation at Boardman is largely attributable to the retirement of the Boardman plant in December 2020. The decrease in generation at Valmy is attributable to Idaho Power ceasing participation in one of the two generating units in December 2019.

1 **Q. Has Idaho Power modeled operations at Boardman through all 12 months of**
2 **2020?**

3 A. No. Although Idaho Power will cease operations at Boardman at the end of 2020, the
4 Company has modeled October 2020 as the last month of planned operations in
5 AURORA. Due to the high costs associated with coal removal, Idaho Power and
6 Portland General Electric (“PGE”), the Company’s operating partner in Boardman, are
7 strategically planning coal purchases in order to deplete the coal inventory before the
8 plant shuts down. Modeling Boardman availability through the end of October reflects
9 the likelihood that coal inventory will be completely exhausted in the fall of 2020, and
10 aligns with the approach agreed upon for PGE in its 2020 Annual Power Cost Update
11 Tariff, Docket No. UE 359, approved in Order No. 19-329.

12 **Q. How did the changes in coal fuel expense and coal-fired generation impact the**
13 **cost of coal production on a per-unit basis?**

14 A. The average cost of coal production, on a per-unit basis, for the 2020 October Update
15 is \$38.90 per MWh, compared to \$36.74 per MWh for the 2019 October Update. At
16 the plant level, the per-unit cost of production decreased 2 percent at Boardman,
17 increased 12 percent at Valmy, and increased 4 percent at Bridger.

18 **Q. What factors are driving the changes in the per-unit cost of production at the**
19 **Company’s coal plants?**

20 A. With the exception of Boardman, the average cost of coal production on a per-unit
21 basis increased for the 2020 October Update as a result of coal generation decreasing
22 to a higher degree than coal fuel expense. In other words, operating costs are being
23 spread over lower production volumes. More specifically, the Company’s fixed
24 proportional share of Oil, Handling, Administrative & General (“OHAG”) expenses are
25 being spread over fewer MWh of production, increasing the per-unit costs relative to
26 the 2019 October Update.

1 **Q. Did Idaho Power model OHAG expenses as agreed upon in the settlement
2 stipulations approved in the 2016 and 2017 APCU dockets?**

3 A. Yes. Per the settlement stipulation approved by Order No. 16-206 in the Company's
4 2016 APCU, Docket No. UE 301, the per-MWh OHAG expense included in the
5 AURORA model has been updated to reflect the amount of OHAG expense driven by
6 Idaho Power's dispatch of each plant. The Company has separately accounted for its
7 proportional share of the total OHAG expense incurred at each of the plants. Per the
8 settlement stipulation approved by Order No. 17-165 in the Company's 2017 APCU,
9 Docket No. UE 314, ("2017 Stipulation"), Idaho Power's proportional share of total
10 OHAG expense incurred at each of the coal-fired plants is forecast using a three-year
11 historical average of actual OHAG costs, with a growth (reduction) rate equal to the
12 five-year historical average growth (reduction) rate.

13 **Q. Have you prepared an exhibit that illustrates the calculation of OHAG expenses
14 for the 2020 APCU?**

15 A. Yes. Exhibit 101 reflects the AURORA-modeled OHAG expense resulting from Idaho
16 Power's dispatch, as well as Idaho Power's fixed ownership share of total OHAG
17 expense at each plant. This methodology effectively includes in the AURORA dispatch
18 price the true variable component of OHAG driven by the Company's dispatch of each
19 plant. After the AURORA-modeled dispatch has occurred, the resulting costs are
20 adjusted to align with costs actually incurred by the Company at each of its coal-fired
21 facilities.

22 For example, on Exhibit 101, Line 4 illustrates the AURORA-modeled OHAG
23 expense resulting from Idaho Power's dispatch of Bridger. Line 5 is the difference
24 between the total AURORA-modeled expenses, Line 3, and the AURORA-modeled
25 OHAG expense, Line 4, at Bridger (\$25,197.6 - \$285.2 = \$24,912.5). Line 6
26 represents the Company's proportional share of total OHAG expenses at Bridger using

1 the stipulated methodology discussed above. Line 7 is the sum of the AURORA-
2 modeled expenses (less the AURORA-modeled OHAG at Bridger, Line 5), and the
3 Company's proportional share of total OHAG, Line 6, ($\$24,912.5 + \$3,132.2 =$
4 $\$28,044.7$). This line reflects the NPSE for Bridger for the 2020 October Update. This
5 method is replicated for Boardman, as shown on Lines 9-13, and for Valmy, as shown
6 on Lines 15-20.

7 **Q. Does Idaho Power's 2020 APCU account for revenues received from or
8 expenses paid to NV Energy (its ownership partner in Valmy) for usage of the
9 Company's unused capacity or the Company's usage of NV Energy's unused
10 capacity?**

11 A. Yes. Per the 2017 Stipulation, Idaho Power agreed to include the three-year historical
12 average of actual net balances associated with ownership partner use of unused
13 capacity at Valmy as an offset or addition to total NPSE. For the 2020 October Update,
14 the 2016-2018 historical average net revenue paid to Idaho Power associated with NV
15 Energy's dispatch of Idaho Power's unused capacity at Valmy is \$67,378 on a system
16 basis. As shown on Line 19 of Exhibit 101, this amount has been reflected as an offset
17 to NPSE for Valmy for the 2020 October Update. The Company will update the three-
18 year historical average as part of the 2020 March Forecast.

19 **Q. Did Idaho Power hold a workshop prior to the 2020 October Update filing to
20 address Bridger Coal Company ("BCC") depreciation expense included in the
21 APCU?**

22 A. Yes. Pursuant to the settlement stipulation approved in Order No. 19-189 in the
23 Company's 2019 APCU, Docket No. UE 350, Idaho Power and PacifiCorp held a
24 workshop with Staff and the Oregon Citizens' Utility Board ("CUB") on September 23,
25 2019, to discuss BCC depreciation expense included in the APCU. The Company and
26

1 PacifiCorp presented on BCC operations, cost recovery, budgeting, asset lives, and
2 depreciation methodology. No additional action items resulted from that meeting.

3 Natural Gas Fuel Expense

4 **Q. How does the natural gas price forecast for the 2020 October Update compare
5 to last year's October Update?**

6 A. The Henry Hub price used for the 2019 October Update was \$3.13 per MMBtu, while
7 the Henry Hub price used in the 2020 October Update is \$2.71 per MMBtu, a decrease
8 of \$0.42 per MMBtu or 13 percent.

9 **Q. How is the Henry Hub gas price forecast used as an AURORA input?**

10 A. The Company uses the gas price forecast for Henry Hub as the starting point in the
11 AURORA model. Henry Hub is considered a reference fuel in AURORA, meaning
12 other gas market prices are determined by applying an adjustment factor to the Henry
13 Hub price. For example, a Henry Hub gas price of \$2.71 per MMBtu applied to a
14 Sumas basis of -\$0.44 per MMBtu equals a Sumas gas price of \$2.27 per MMBtu
15 (\$2.71 - \$0.44 = \$2.27). The Company develops a separate gas price for its natural
16 gas units also based upon the Henry Hub gas price forecast, referred to as the Idaho
17 Citygate price.

18 **Q. Please explain the Idaho Citygate price.**

19 A. The Idaho Citygate price is representative of the gas price delivered to Idaho Power's
20 natural gas units. The Idaho Citygate price is based on the Henry Hub price and
21 applies adjustments for Sumas basis and transport costs.

22 **Q. How does the Idaho Citygate price for the 2020 October Update compare to last
23 year?**

24 A. The average Idaho Citygate price for the 2020 October Update is \$2.12 per MMBtu
25 compared to \$2.08 per MMBtu for the 2019 October Forecast.

26

- 1 **Q. If the Henry Hub gas price is decreasing, why did the Idaho Citygate price**
2 **increase?**
- 3 A. The increase in the Idaho Citygate price for the 2020 October Update is attributable to
4 a 47 percent increase in the Sumas basis. Sumas, located in Washington on the
5 border with Canada, forms the primary natural gas trading hub for consumers in the
6 Pacific Northwest. The increase in the Sumas basis adjustment is due to the waning
7 impact of the Enbridge natural gas pipeline explosion that occurred in October 2018.
8 The Enbridge pipeline runs from British Columbia and connects to the Northwest
9 Pipeline system, which feeds the Pacific Northwest with natural gas. Due to the
10 October 2018 explosion, natural gas storage in the Pacific Northwest was depleted
11 last year. For context, the Idaho Citygate price included in the 2019 March Forecast
12 was \$3.17 per MMBtu, when the market was still significantly impacted by the pipeline
13 explosion. Repairs to the Enbridge pipeline have been completed, but work is still
14 being done to return the pipeline to 100 percent deliverability.

15 **PURPA Expense**

- 16 **Q. Please explain any changes in PURPA generation since last year's October**
17 **Update.**
- 18 A. Last year's October Update included 343 average-megawatts ("aMW") of PURPA
19 generation, whereas PURPA generation included in the 2020 October Update is 345
20 aMW, an increase of 2 aMW, or less than 1 percent. The increase in PURPA
21 generation is primarily due to normal fluctuations in estimated output from the
22 generation facilities, as no new projects are scheduled to come online during the 2020
23 APCU test year.
- 24 **Q. How has the annual PURPA expense changed from last year's October Update?**
- 25 A. Annual PURPA expense increased from \$221.1 million to \$223.5 million, an increase
26 of \$2.4 million, or 1 percent. The increase in annual PURPA expense is a combination

1 of the small increase in forecasted generation discussed above, as well as updated
2 PURPA contract values.

3 Normalized Load

4 **Q. Please describe the changes in the Company's system loads since last year's
5 October Update.**

6 A. The Company's normalized system load used in last year's October Update was 1,833
7 aMW. The Company's normalized system load used in this year's October Update is
8 1,860 aMW, representing an increase in load of 27 aMW, or 1 percent, between the
9 two test periods.

10 Other

11 **Q. What other AURORA inputs were modified from last year's October Update?**

12 A. The Company updated the maintenance rates, forced outage rates, and heat rates for
13 its thermal plants, which is a consistent practice for every APCU filing.

14 Modeling Results

15 **Q. Have you prepared an exhibit that summarizes the results of the AURORA model
16 with all of the updated inputs described above?**

17 A. Yes. Exhibit 101 shows the results of the AURORA modeling determination of
18 normalized NPSE for the April 2020 through March 2021 test year. Exhibit 101
19 presents the summary of results containing average variable power supply generation
20 output and expenses based on 91 historical water conditions.

21 **Q. Please summarize the sources and disposition of energy shown on Exhibit 101.**

22 A. As can be seen on Exhibit 101, hydro generation supplies 8.8 million MWh,
23 approximately 50 percent (8.8 million MWh / 17.6 million MWh = 50 percent) of the
24 generation mix. Thermal generation supplies 4.2 million MWh (Bridger 0.7, Boardman
25 0.1, Valmy 0.2, Langley Gulch 2.2, Danskin 0.6, Bennett Mountain 0.4), approximately
26 24 percent (4.2 million MWh / 17.6 million MWh = 24 percent) of the generation mix.

Purchases of power are made up of short-term and longer-term market purchases, purchased power agreements ("PPA"), and PURPA. PURPA purchases reflect normalized and annualized generation levels and account for 3.0 million MWh. The generation amounts and costs associated with PURPA purchases are not shown on Exhibit 101; however, when combined with market purchases of 1.1 million MWh and PPAs of 0.5 million MWh, total purchases amount to 4.6 million MWh (3.0 million MWh + 1.1 million MWh + 0.5 million MWh = 4.6 million MWh) or approximately 26 percent of the generation mix. Of the 17.6 million MWh generated by the system, 16.3 million MWh are utilized for system loads while 1.3 million MWh are sold as surplus sales.

Base Net Power Supply Expenses

Q. How are the Base Net Power Supply Expenses to be calculated for the October Update portion of the APCU according to the settlement stipulation approved in Order No. 08-238?

A. Per the settlement stipulation approved in Order No. 08-238, the output of the AURORA model will be used to determine net power supply average dispatch cost for normal loads and average stream flow conditions, and the wholesale electric prices for purchased power and surplus sales determined by the AURORA model will be replaced with an average forward electric price curve (Docket No. UE 195, Stipulation, p. 3).

Q. Please describe the re-pricing methodology mentioned above.

A. The Company is required to re-price the AURORA-generated volumes of purchased power and surplus sales with a forward-based price curve using the Mid-Columbia ("Mid-C") hub. This methodology prescribes the use of a one-year average of the daily Mid-C forward price curves calculated from the previous 12 months of daily Mid-C heavy load and Mid-C light load forward price curves for the period starting in the April immediately following the current April through March test period. Forward prices are

1 then adjusted for inflation back one year using the most recent Producer Price Index
2 for Electric Power.

3 The re-pricing of market prices in the 2020 October Update is based upon the
4 daily forward price curves for April 2021 through March 2022 as shown in Exhibit 102,
5 which were then discounted for inflation back to April 2020 through March 2021
6 according to the quarterly inflation indices provided in Exhibit 103.

7 **Q. What is the monthly average forward price that is used for the re-pricing of
8 purchased power and surplus sales volumes?**

9 A. Exhibit 104 shows the monthly prices that are used for the re-pricing of purchased
10 power and surplus sales volumes for the 2020 October Update. The prices range from
11 a low of \$11.16 per MWh to a high of \$55.90 per MWh.

12 **Q. How does the re-pricing of purchased power and surplus sales, using a normal
13 forward price curve, change purchased power expenses and surplus sales
14 revenues as modeled by AURORA?**

15 A. Lines 33 and 41 of Exhibit 101 show the purchased power expenses and surplus sales
16 revenues, respectively, as determined by the AURORA modeling process. Lines 20
17 and 28 of Exhibit 105 show the same normalized generation dispatch with purchased
18 power and surplus sales re-priced using the normalized forward price curve shown in
19 Exhibit 104. A comparison of Exhibit 101 and Exhibit 105 demonstrates the changes
20 due to re-pricing. Purchased power expenses increased by \$8.7 million, moving from
21 \$35.4 million to \$44.1 million. Surplus sales revenues increased by \$4.6 million,
22 moving from \$24.7 million to \$29.3 million. In this case, the NPSE resulting from the
23 re-pricing methodology shown on Exhibit 105 is an increase in NPSE of \$4.1 million
24 as compared to the AURORA-generated expectation shown on Exhibit 101. The
25 differences for the re-pricing of purchased power of \$8.7 million and surplus sales of
26 \$4.6 million are shown on Exhibit 108, Column J.

1 Energy Imbalance Market (“EIM”) Benefits and Costs

2 **Q. Has the Company adjusted the NPSE amounts included in the 2020 October**
3 **Update to reflect Idaho Power’s participation in the Western EIM?**

4 A. Yes. The NPSE requested for approval in the 2020 October Update includes both the
5 incremental benefits and costs associated with Idaho Power’s participation in the
6 Western EIM. Because the cost-savings benefits associated with EIM participation
7 will be reflected as decreased NPSE, it is appropriate to include an estimate of both
8 the incremental benefits and the incremental costs required for participation as part of
9 this APCU.

10 **Q. What level of EIM benefits is Idaho Power proposing to include in the 2020**
11 **October Update?**

12 A. Idaho Power is proposing to include \$15.6 million in system EIM benefits as an offset
13 to NPSE in the 2020 October Update. On an Oregon allocated basis, the EIM benefits
14 to be included in the 2020 October Update total \$724,599.

15 **Q. How does this compare to the level of EIM benefits included in last year’s**
16 **October Update?**

17 A. The settled 2019 October Update system EIM benefit was \$15.1 million, or \$699,431
18 on an Oregon allocated basis.

19 **Q. How did the Company determine the level of EIM benefits to be included in the**
20 **2020 October Update?**

21 A. The level of EIM benefits to be included in the 2020 October Update utilizes the
22 California Independent System Operator (“CAISO”) report of EIM benefits, for October
23 2018 through September 2019, as a starting point, and then accounts for necessary
24 adjustments to quantify ongoing cost-savings benefits specific to Idaho Power’s
25 participation in the EIM. These adjustments, which I will detail individually, include an

1 adjustment to the CAISO methodology as it pertains to the hydro-pricing cost structure,
2 and an adjustment for third-party load included in the Company's balancing area.

3 **Q. How does CAISO quantify EIM benefits?**

4 A. CAISO uses a counterfactual methodology in which dispatch for an EIM Balancing
5 Authority Area ("BAA") mimics market operations without importing or exporting
6 through EIM transfers. The counterfactual dispatch moves units inside the BAA to
7 meet real-time imbalance based on economic merit order. CAISO's quantification of
8 total estimated EIM benefits is the cost savings of the EIM dispatch compared to the
9 counterfactual without EIM dispatch. In order to determine both EIM dispatch costs
10 and counterfactual costs, CAISO relies upon bid prices submitted by EIM entities.

11 Q. **What concerns does the Company have regarding CAISO's EIM benefits
12 methodology as it relates specifically to Idaho Power?**

13 A. One of the major assumptions CAISO makes in its benefits methodology, due to lack
14 of other data, is that the bids submitted for each participating resource reflect the true
15 dispatch costs, or the economic value, of those resources. For most resource types,
16 this assumption may be reasonable; however, this assumption is not accurate for
17 hydro resources.

18 Idaho Power bids hydro resources based on an operational need rather than
19 actual dispatch cost. Additionally, Idaho Power utilizes various pricing tiers for its
20 hydro resources to protect the water from overuse in the market and to adhere to
21 regulated water management policies.¹ The pricing tiers that Idaho Power uses are
22 based upon certain operational parameters and can result in high bid prices when it is
23 necessary to cease or limit water flows for a particular hydro resource's market
24 participation. When Idaho Power operators move water into the higher tiers, which

25
26 ¹ Requirements may include flood control obligations, fish flow obligations, etc.

1 have a higher bid price, it is a response to operational needs and does not reflect
2 market benefits.

3 Without adjusting for these operating scenarios, CAISO's EIM benefit
4 methodology incorrectly reflects the bid tier price as the economic value of hydro in
5 the determination of both counterfactual costs and EIM dispatch costs, thereby
6 overstating the resulting benefits. In order for the EIM benefit calculation to properly
7 serve as an adjustment to modeled NPSE, Idaho Power made adjustments to the
8 CAISO methodology as it pertains to the hydro-pricing cost structure.

9 **Q. Please describe the changes Idaho Power made to the hydro-pricing cost
10 structure for purposes of the EIM benefit calculation.**

11 A. To reflect the correct economic value of the hydro dispatches in the EIM benefit
12 calculation, Idaho Power made a two-part adjustment to the hydro cost structure. First,
13 all hydro dispatch costs are held constant by applying a zero-cost. This satisfies a
14 correction to CAISO's EIM counterfactual costs as there should not be any costs
15 associated with Idaho Power's dispatching up and down of its hydro resources to meet
16 its load imbalances.

17 Holding the dispatch costs constant by applying a zero-cost also satisfies a
18 correction to the EIM dispatch costs. The EIM is not a capacity market. Therefore, in
19 a hydro system with limited ability to store water long-term, the majority of EIM imports
20 (or the dispatching down and storage of the water) will have matching exports over a
21 given time period (that water will be exported soon thereafter). When EIM hydro
22 imports have matching exports over a measured period, in the case of Idaho Power's
23 analysis on a daily basis, dispatch costs should be held constant by replacing all tier
24 prices with a zero cost. In this scenario, the actual benefit is the difference between
25 the EIM import and export price. If the EIM dispatch cost is not held constant over the
26 measured period, it results in an inaccurate benefit. However, when hydro imports do

1 not equal exports, it is necessary to value, or assign a cost to, the net import / exports
2 to the market. This is the second part of the adjustment Idaho Power made to the
3 hydro-pricing cost structure as it pertains to the EIM benefit calculation.

4 **Q. Why is it necessary to value net imports and exports related to the EIM?**

5 A. When imports exceed exports during the measured period, using a zero-cost value
6 will underestimate benefits because it is not properly accounting for the value of
7 imported energy that served load (rather than hydro) and provided a benefit to the
8 Company's customers. Conversely, when exports exceed imports during the
9 measured period, the zero-cost value will inflate benefits because there are not any
10 costs assigned to the water that was moved into the market. In either scenario, the
11 net imports / exports for the hydro resources will show a benefit at the EIM Locational
12 Marginal Price ("LMP") because there are no costs associated with the hydro
13 dispatches. As a result, it is necessary to make a second adjustment to the EIM benefit
14 calculation.

15 **Q. Please explain the methodology used by the Company to value EIM net imports
16 and exports of hydro-related energy.**

17 A. Idaho Power adjusted the EIM benefits by assigning a value to the hydro net imports
18 / exports for each day based on the average daily price in the bilateral market.
19 Applying a market price to the net hydro import / export position, allows the Company
20 to properly account for the cost of hydro that was imported or exported into the EIM.

21 With the exception of October and November 2018, Idaho Power was a net
22 exporter in all months for the prior year (for hydro only). Therefore, the zero-cost
23 method results in an inflated benefit overall. To correct for this error, Idaho Power
24 replaced the zero-priced dispatch cost with an average daily bilateral price for all days
25 that the Company was a net exporter. The difference between this value, the value
26

1 the energy would have had in the bilateral market, and the LMP (under the zero-cost
2 method, the benefit is at the LMP) is then subtracted from the total EIM benefit.

3 Idaho Power's methodology also accounts for days in which the Company was
4 a net importer and therefore the zero-cost method results in an underestimated EIM
5 benefit. In these instances, Idaho Power again used an average daily bilateral price
6 to value the cost savings to the Company of importing energy from the EIM. The
7 difference in this value, the value the energy would have had in the bilateral market,
8 and the LMP (under the zero-cost method, the benefit is at the LMP) is added to the
9 total EIM benefit.

10 **Q. Did Idaho Power prepare an exhibit to illustrate the adjustments to the hydro-**
11 **pricing cost structure of the EIM benefit calculation?**

12 A. Yes. Exhibit 106 demonstrates Idaho Power's adjustments to the CAISO EIM benefit
13 methodology as it pertains to the hydro-pricing cost structure for the full 12-month
14 period. Column A of Exhibit 106 includes CAISO's reported benefits for Idaho Power
15 for October 2018 through September 2019 of \$32.5 million. Column B illustrates Idaho
16 Power's application of a zero-cost for all hydro tier prices when EIM imports equal
17 exports on a daily basis. This adjustment resulted in an EIM benefit of \$19.1 million,
18 a \$13.4 million reduction from CAISO's stated EIM benefits for Idaho Power.

19 Column C of Exhibit 106 demonstrates the adjustment to the daily net import /
20 export position for the hydro resources. As discussed previously, Idaho Power
21 assigned a value to the net import / export position for each day based on the average
22 daily price in the bilateral market. This adjustment resulted in a \$2.2 million reduction
23 to the EIM benefit estimate.

24 Exhibit 106 also illustrates an adjustment related to third-party loads in the
25 Company's BAA that are included in CAISO's benefit calculation.

26

1 **Q. Please explain the adjustment for benefits related to third-party loads in the**
2 **Company's BAA that are included in CAISO's benefit calculation.**

3 A. The benefits reported by CAISO reflect a value for the entire BAA each month;
4 however, the Company has third-party load in its BAA whose benefits are being
5 included in CAISO's reported benefits for Idaho Power. To better determine the
6 benefits attributable to Idaho Power, the Company developed a method to reflect the
7 monthly EIM BAA benefits based on a load ratio allocation between Idaho Power load
8 and third-party customer loads in the Idaho Power BAA. Idaho Power also applied
9 this adjustment to the 2019 APCU EIM benefit calculation.

10 **Q. Please describe the adjustment to allocate a portion of the EIM benefits to third-**
11 **party load.**

12 A. The Company applied the monthly percentage of transmission load ratio share
13 attributable to its third-party load customer for October 2018 through September 2019.
14 This calculation determined that on average, approximately 7.18 percent of the BAA
15 load relates to the third parties. In order to only include EIM benefits related to the
16 Company, the EIM benefit was reduced by \$1.2 million, which reflects the 7.18 percent
17 of the total BAA EIM benefits.

18 **Q. Please summarize the final estimate of EIM benefits to be included in the 2020**
19 **APCU.**

20 A. The Company's EIM benefits forecast is based on the CAISO's EIM benefits reports,
21 with necessary adjustments for hydro pricing and third-party loads as described in this
22 testimony. As detailed in Exhibit 106, the Company's total estimated benefit for April
23 2020 through March 2021 is \$15.6 million, or \$0.72 million on an Oregon jurisdictional
24 basis. The Company has included the estimate of EIM benefits as an offset to forecast
25 NPSE for the October Update as shown in Exhibit 105.

26 **Q. Please describe the incremental costs of Western EIM participation.**

1 A. As stated previously, by participating in the Western EIM, the Company achieves
2 NPSE savings, which benefit customers; however, to achieve such benefits, Idaho
3 Power has incurred, and will continue to incur, incremental costs to participate in the
4 Western EIM, including software and metering investments and annual, ongoing
5 operations and maintenance (“O&M”) expenses. Consistent with the 2019 APCU, the
6 Company has included EIM-related costs in the 2020 APCU. The EIM-related costs
7 included in the 2020 October Update consist of the annual return on net rate base from
8 the capital investment required to participate in the Western EIM, depreciation
9 expense, and ongoing O&M expenses. On an Oregon allocated basis, the revenue
10 requirement associated with EIM costs to be included in the 2020 October Update is
11 \$145,713, as shown in Exhibit 107.

12 Q. **Why does the Company believe the APCU is the appropriate mechanism to
13 recover EIM-related costs?**

14 A. Over the long term, the Company envisions that both the benefits and costs associated
15 with EIM participation would be part of net power supply costs reflected in base rates
16 as addressed in a general rate case. However, because the timing of the Company’s
17 next general rate case is unknown, it is necessary to utilize an interim rate mechanism
18 for cost recovery to provide for proper matching of costs and benefits in customer
19 rates.

20 Since participation in the Western EIM began in April 2018, the Company, and
21 ultimately its customers, have achieved cost-saving benefits. As these benefits are in
22 the form of reduced NPSE, it is appropriate to recover the costs of EIM participation
23 under the mechanism in which NPSE is recovered. Including the EIM-related costs in
24 the 2020 APCU is necessary to ensure that customer rates reflect a proper matching
25 of EIM benefits and costs and to prevent intergenerational inequities. This treatment
26

1 was approved by the Commission in Idaho Power's 2018 and 2019 APCU dockets,
2 Docket Nos. UE 333 and UE 350, in Order Nos. 18-170 and 19-189.

3 Per-Unit Cost Calculation and NPSE Discussion

4 **Q. What is the NPSE per-unit cost when you combine all of the quantifications
5 described earlier?**

6 A. Exhibit 105 shows total system NPSE of \$376.8 million and normalized annual sales
7 at the customer level for the April 2020 through March 2021 test year of 15,012,868
8 MWh, resulting in a per-unit cost for the 2020 October Update of \$25.10 per MWh
9 (\$376.2 million / 15.013 million MWh = \$25.10 per MWh) to become effective on June
10 1, 2020.

11 Q. **How does the 2020 October Update per-unit cost of \$25.10 per MWh compare to
12 the 2019 October Update per-unit cost?**

13 A. The 2019 October Update per-unit cost, which became effective June 1, 2019, was
14 \$25.40 per MWh based upon a determination of total NPSE of \$376.8 million.

15 Q. **Has the Company prepared an exhibit that demonstrates the changes in NPSE
16 as compared to last year?**

17 A. Yes. Exhibit 108 compares the AURORA-developed results, the re-pricing of
18 purchased power and surplus sales, and the differences between the 2019 October
19 Update and the 2020 October Update. Column H of Exhibit 108 shows the following:
20 (1) A decrease in coal expenses of \$24.4 million associated with a decrease of 0.73
21 million MWh in generation, (2) a decrease in natural gas expenses of \$10.4 million
22 associated with a decrease of 0.31 million MWh in generation, (3) an increase in
23 market purchased power expenses of \$33.1 million associated with an increase of
24 0.72 million MWh, (4) a decrease in PPA expenses of \$1.3 million associated with a
25 decrease of 0.03 million MWh, (5) an increase in PURPA expenses of \$2.4 million
26

1 associated with an increase of 0.01 million MWh, and finally, (6) a decrease in surplus
2 sales revenue of \$1.1 million associated with a decrease of 0.30 million MWh.

3 **Q. Can you elaborate more on the changes in generation from the 2019 October
4 Update to the 2020 October Update?**

5 A. To illustrate the changes in generation, Columns D (2019) and F (2020) of Exhibit 108
6 calculate the percentage of generation compared to total system load. For example,
7 Column F, line 1, shows that hydro provided 54 percent of the generation to meet the
8 total system load of 16,298,733 MWh ($8,804,407 / 16,298,733 = 54$ percent). A
9 comparison of the 2020 October Update to the 2019 October Update demonstrates
10 that hydro generation was up slightly from 53 percent to 54 percent, coal generation
11 decreased from 11 percent to 6 percent, natural gas generation decreased from 21
12 percent to 19 percent, market purchased power increased from 3 percent to 7 percent,
13 PPA generation was unchanged at 3 percent, PURPA generation was unchanged at
14 19 percent, and lastly, surplus sales decreased from negative 10 percent to negative
15 8 percent. This comparison between resource type and total system load shows that
16 increased market purchases and hydroelectric generation have displaced coal
17 generation and natural gas generation.

18 **Q. Are the changes in expenses among resource types consistent with the changes
19 in output?**

20 A. Yes. The changes in expenses among resource types are relatively consistent with
21 the changes in output. The changes in expenses for each resource type are also
22 shown in Columns D (2019) and F (2020) of Exhibit 108 as follows: Coal expense
23 decreased from 17 percent to 11 percent of total NPSE, natural gas expense
24 decreased from 21 percent to 18 percent, market purchased power expense increased
25 from 3 percent to 12 percent, PPA expense was unchanged at 12 percent, PURPA
26 expense was unchanged at 59 percent, and surplus sales revenue remained

1 unchanged at negative 8 percent. Exhibit 108 demonstrates that the majority of
2 movement in expenses is related to market purchases, coal, and natural gas, which is
3 consistent with the changes in generation.

4 **Q. What can be concluded from the information presented in Exhibit 108?**

5 A. The information shown in Exhibit 108 suggests that low-cost market purchased power
6 and increased hydroelectric generation are offsetting thermal generation as compared
7 to last year's October Update. Additionally, low market prices have reduced the
8 Company's ability to make economic off-system sales. In total, NPSE included in the
9 2020 October Update is nearly identical to NPSE included in the 2019 October Update.

10 **Q. Did the Company comply with the methodology in Order No. 08-238 when it
11 performed its analysis to determine the NPSE for the 2020 October Update?**

12 A. Yes. The Company has complied with the methodology detailed in Order No. 08-238
13 for calculating this year's October Update.

14 Jurisdictional Allocation of NPSE

15 **Q. How did the Company calculate the Oregon jurisdictional share of NPSE?**

16 A. Per the 2017 Stipulation, the Oregon jurisdictional share of NPSE is calculated by
17 multiplying the system NPSE total per-unit cost of \$25.10 per MWh by the forecasted
18 Oregon jurisdictional loss-adjusted normalized sales for the April 2020 through March
19 2021 test period of 695,285,576 MWh, resulting in an Oregon jurisdictional share of
20 NPSE of \$17.45 million ($\$25.10 \times 695,285,576 \text{ MWh} = \17.45 million), as shown on
21 Line 1 of Exhibit 109.

22 Quantification and Discussion of the APCU Revenue Requirement

23 **Q. Based on the determination of the Oregon jurisdictional share of NPSE, what is
24 the APCU revenue requirement for the 2020 October Update?**

25 A. As shown on Line 3 of Exhibit 109, the APCU revenue requirement is \$17.6 million.
26 The APCU revenue requirement is calculated by adding the 2020 October Update

1 Oregon jurisdictional share of NPSE of \$17.45 million, Line 1, to the Oregon allocated
2 EIM costs of \$145,713, Line 2.

3 **Q. What is the overall revenue impact of this year's October Update compared to**
4 **current revenue?**

5 A. Exhibit 109 also reveals the revenue impact resulting from this year's October Update.
6 As shown on Line 12, base NPSE recovery under current approved APCU rates is
7 \$17.8 million, whereas the proposed 2020 APCU October Update revenue
8 requirement is \$17.6 million, as shown on Line 3. The comparison of this year's
9 October Update to current approved revenue indicates a credit to Oregon customer
10 rates of \$0.2 million.

11 **Rate Implementation**

12 **Q. What method of allocation did the Company use to spread the APCU revenue**
13 **requirement associated with the 2020 October Update to the various customer**
14 **classes?**

15 A. The Company allocated the \$17.6 million APCU revenue requirement associated with
16 the 2020 October Update using the revenue spread methodology agreed upon in the
17 settlement stipulation approved by Order No. 18-170 in the Company's 2018 APCU,
18 Docket No. UE 333 ("2018 Stipulation"). The 2018 Stipulation established a revenue
19 spread methodology whereby the total APCU revenue requirement is allocated to
20 individual customer classes on the basis of normalized jurisdictional forecasted sales
21 at the generation level for the test period. Additionally, any rate increases resulting
22 from application of this revenue spread methodology as applied to a customer class
23 will be capped at 3 percent above the overall average rate increase on a percentage
24 of total revenue basis. In this case, the overall average rate change as a percentage
25 of total revenue is a decrease of 0.32 percent; therefore, any rate increases applied to
26 individual customer classes will be capped at 2.68 percent.

- 1 **Q. Were any customer classes subject to the rate cap described above?**
- 2 A. No. Application of the stipulated revenue spread methodology results in rate changes
3 for all individual customer classes below the 2.68 percent cap. The highest rate
4 change is 2.50 percent for Large Power Transmission Service customers (Tariff
5 Schedule 19T). The final proposed revenue spread resulting from the application of
6 the stipulated methodology is provided in Exhibit 109.
- 7 **Q. Have you prepared an exhibit showing the summary of the revenue impact**
8 **resulting from the October Update proposed by the Company?**
- 9 A. Yes. Exhibit 110 provides a summary of the revenue change resulting from this year's
10 October Update as compared to current revenue.
- 11 **Q. Does the Company intend to provide supporting workpapers for the 2020**
12 **October Update to Staff and CUB?**
- 13 A. Yes. Idaho Power will provide its supporting workpapers to Staff and CUB as part of
14 the 2020 APCU filing, including workpapers to support the depreciable lives of BCC
15 assets, per the 2018 Stipulation. The Company intends to provide these workpapers
16 within five business days of filing the 2020 APCU.
- 17 **Q. Does this conclude your testimony?**
- 18 A. Yes, it does.

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Idaho Power/101
Witness: Nicole A. Blackwell

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

Idaho Power Company's AURORA Modeled Power Supply Expenses for
April 1, 2020 – March 31, 2021
Normalized Loads Over 91 Water Year Conditions

October 31, 2019

Idaho Power/102
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

Mid-Columbia Heavy and Light Load
Forward Price Curves

October 31, 2019

Idaho Power/103
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

Producer Price Index for Electric Power

October 31, 2019

Mnemonic:	FXPPIFU4.IUSA
Description:	PPI: Electric Power - Total, (Index 1982=100, NSA) for United States
Source:	U.S. Bureau of Labor Statistics (BLS); Moody's Analytics (ECCA) Forecast
Native Frequency:	QUARTERLY
Geography:	United States
Last Updated:	10/08/2019
2012Q1	185.8333
2012Q2	188.8333
2012Q3	196.8667
2012Q4	190.4000
2013Q1	189.1667
2013Q2	193.1667
2013Q3	199.3000
2013Q4	191.7667
2014Q1	195.7333
2014Q2	200.8333
2014Q3	208.3000
2014Q4	199.0000
2015Q1	200.8333
2015Q2	203.5667
2015Q3	212.0333
2015Q4	199.3000
2016Q1	196.3667
2016Q2	199.7667
2016Q3	209.5667
2016Q4	200.0333
2017Q1	205.5667
2017Q2	211.1000
2017Q3	218.4000
2017Q4	208.4667
2018Q1	210.6333
2018Q2	213.4000
2018Q3	220.0667
2018Q4	209.2333
2019Q1	210.4000
2019Q2	214.0667
2019Q3	222.6305
2019Q4	212.9236
2020Q1	213.4538
2020Q2	218.8576
2020Q3	227.5090
2020Q4	218.2219
2021Q1	219.2855
2021Q2	225.0042
2021Q3	233.8561
2021Q4	224.3449
2022Q1	225.6099
2022Q2	231.7939
2022Q3	241.1785
2022Q4	231.5652

Idaho Power/104
Witness: Nicole A. Blackwell

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

**Idaho Power Company's Forward Price Curves Discounted for Inflation
Used to Re-Price Purchased Power
and Surplus Sales for the October Update**

October 31, 2019

IDAHO POWER COMPANY
Mid-C Forward Price Curves Discounted for Inflation
Used to Re-Price Purchased Power and Surplus Sales for the October Update (UE 195 Settlement Methodology)

Idaho Power/105
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

Idaho Power Company's Power Supply Expenses for April 1, 2020 – March 31, 2021
(Multiple Gas Prices – 91 Water Year Conditions)

October 31, 2019

Idaho Power/106
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

Idaho Power Company's
Energy Imbalance Market Benefits

October 31, 2019

IDAHO POWER COMPANY
2020 APCU October Update
Energy Imbalance Market Benefit Forecast
Based on October 2018-September 2019 Historical Data

(A)	(B)	(C)	(D)	(E)	(F)
CAISO Benefit	Zero-cost Hydro Adjustment	Hydro Net (Export)/Import Adjustment	BPA Load Share %	BPA Load Share Adjustment	Idaho Power EIM Benefit
Oct-18	\$ 4,583,970	\$ 1,009,784	\$ 69,768	7.24% \$ (78,173.36)	\$ 1,001,380
Nov-18	\$ 2,970,586	\$ 509,156	\$ 82,140	7.23% \$ (42,763.50)	\$ 548,533
Dec-18	\$ 2,820,096	\$ 810,242	\$ (30,331)	7.20% \$ (56,158.76)	\$ 723,751
	\$ 10,374,652	\$ 2,329,182	\$ 121,577	\$ (177,096)	\$ 2,273,664
Jan-19	\$ 1,640,110	\$ 1,160,833	\$ (105,823)	7.21% \$ (76,018)	\$ 978,992
Feb-19	\$ 4,207,430	\$ 3,183,080	\$ (490,339)	7.24% \$ (194,869)	\$ 2,497,872
Mar-19	\$ 2,598,353	\$ 2,127,533	\$ (972,713)	7.22% \$ (83,377)	\$ 1,071,444
	\$ 8,445,893	\$ 6,471,446	\$ (1,568,875)	\$ (354,264)	\$ 4,548,307
Apr-19	\$ 2,028,444	\$ 1,561,902	\$ (216,663)	7.19% \$ (96,735)	\$ 1,248,504
May-19	\$ 2,107,396	\$ 1,679,997	\$ (148,497)	7.17% \$ (109,799)	\$ 1,421,702
Jun-19	\$ 4,189,491	\$ 3,117,435	\$ (155,195)	7.13% \$ (211,081)	\$ 2,751,159
	\$ 8,325,332	\$ 6,359,334	\$ (520,355)	\$ (417,615)	\$ 5,421,365
Jul-19	\$ 1,569,384	\$ 1,272,737	\$ (105,504)	7.12% \$ (83,146.46)	\$ 1,084,086
Aug-19	\$ 1,518,655	\$ 1,065,393	\$ (8,290)	7.12% \$ (75,302)	\$ 981,802
Sep-19	\$ 2,271,843	\$ 1,560,976	\$ (121,272)	7.16% \$ (103,116.48)	\$ 1,336,588
	\$ 5,359,882	\$ 3,899,106	\$ (235,066)	\$ (261,565)	\$ 3,402,475
Total	\$ 32,505,759	\$ 19,059,069	\$ (2,202,719)	7.18% \$ (1,210,539)	\$ 15,645,811

Idaho Power/107
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell
Idaho Power Company's Energy Imbalance Market Costs

October 31, 2019

**Idaho Power Company
2020 October Update
Oregon Jurisdictional EIM Revenue Requirement**

2020 Calendar Year Revenue Requirement

Capital Investment	\$359,933
ADIT	(\$16,658)
Accumulated Depreciation	(\$1,688)
Amortization of Other Plant	(\$55,296)
Net Rate Base	\$286,292
<hr/>	
Return on Rate Base	\$22,208
<hr/>	
O&M (On-going)	\$68,373
Depreciation	\$50,521
Taxes	(\$32,896)
Total Operating Expenses	\$85,999
<hr/>	
Net-to-Gross Tax Multiplier	1.347
<hr/>	
Total Revenue Requirement	\$145,713

Idaho Power/108
Witness: Nicole A. Blackwell

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

**Idaho Power Company's Year-Over-Year
Differences in Modeled Power Supply Expenses**

October 31, 2019

IDAHO POWER COMPANY
YEAR OVER YEAR DIFFERENCES IN AURORA DEVELOPED NPSE
2020 OCTOBER UPDATE

AURORA DEVELOPED NPSE RESULTS BEFORE MARKET ENERGY RE-PRICING		REPRICED USING FORWARD MARKET PRICES				DIFFERENCES					
Line No.	GENERATION		GENERATION				GENERATION				
	A	B	C	D	E	F	G	H	I	J	
Resource Type	2019 October Update	2020 October Update	Resource Type	2019 October Update	2020 October Update	Resource Type	(B-A)	(E-C)	(C-A)	(E-B)	
1 Hydro (MWh)	8,553,211	8,804,407	Hydro (MWh)	8,553,211	53%	8,804,407	54%	251,196	251,196	-	-
2 Coal (MWh)	1,775,354	1,048,389	Coal (MWh)	1,775,354	11%	1,048,389	6%	(726,966)	(726,966)	-	-
3 Natural Gas (MWh)	3,412,661	3,100,788	Natural Gas (MWh)	3,412,661	21%	3,100,788	19%	(311,873)	(311,873)	-	-
4 Market Purchased Power (MWh)	405,435	1,121,266	Market Purchased Power (MWh)	405,435	3%	1,121,266	7%	715,831	715,831	-	-
5 Purchased Power Agreements (MWh)	561,952	528,060	Purchased Power Agreements (MWh)	561,952	3%	528,060	3%	(33,892)	(33,892)	-	-
6 PURPA (MWh)	3,016,404	3,022,607	PURPA (MWh)	3,016,404	19%	3,022,607	19%	6,203	6,203	-	-
7 Surplus Sales (MWh)	1,624,061	1,326,784	Surplus Sales (MWh)	1,624,061	-10%	1,326,784	-8%	(297,276)	(297,276)	-	-
8 System Generation (MWh)	17,725,017	17,625,517	System Generation (MWh)	17,725,017		17,625,517					
9 System Load (MWh)	16,100,957	16,298,733	System Load (MWh)	16,100,957	100%	16,298,733	100%	197,776	197,776	-	-
10 System Load (aMW)	1,833	1,861	System Load (aMW)	1,833		1,861		28	28	-	-
NET POWER SUPPLY EXPENSES		NET POWER SUPPLY EXPENSES				NET POWER SUPPLY EXPENSES					
Resource Type	2019 October Update	B	Resource Type	2019 October Update	D	E	F	G	H	I	J
11 Hydro (\$ x 1000)	\$ -	\$ -	Hydro (\$ x 1000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12 Coal (\$ x 1000)	\$ 65,221.0	\$ 40,781.7	Coal (\$ x 1000)	\$ 65,221.0	17%	\$ 40,781.7	11%	\$ (24,439.2)	\$ (24,439.2)	\$ -	\$ -
13 Natural Gas (\$ x 1000)	\$ 79,120.3	\$ 68,745.4	Natural Gas (\$ x 1000)	\$ 79,120.3	21%	\$ 68,745.4	18%	\$ (10,374.9)	\$ (10,374.9)	\$ -	\$ -
14 Market Purchased Power (\$ x 1000)	\$ 13,348.6	\$ 35,437.8	Market Purchased Power (\$ x 1000)	\$ 10,981.5	3%	\$ 44,085.9	12%	\$ 22,089.1	\$ 33,104.5	\$ (2,367.2)	\$ 8,648.2
15 Purchased Power Agreements (\$ x 1000)	\$ 45,885.2	\$ 44,625.0	Purchased Power Agreements (\$ x 1000)	\$ 45,885.2	12%	\$ 44,625.0	12%	\$ (1,260.2)	\$ (1,260.2)	\$ -	\$ -
16 PURPA (\$ x 1000)	\$ 221,135.0	\$ 223,561.9	PURPA (\$ x 1000)	\$ 221,135.0	59%	\$ 223,561.9	59%	\$ 2,426.8	\$ 2,426.8	\$ -	\$ -
17 Surplus Sales (\$ x 1000)	\$ (36,106.3)	\$ (24,767.3)	Surplus Sales (\$ x 1000)	\$ (30,397.0)	-8%	\$ (29,327.1)	-8%	\$ 11,338.9	\$ 1,069.9	\$ 5,709.3	\$ (4,559.7)
18 EIM Benefits	\$ (15,120.1)	\$ (15,645.8)	EIM Benefits	\$ (15,120.1)	-4%	\$ (15,645.8)	-4%	\$ (525.7)	\$ (525.7)	\$ -	\$ -
19 Total System (\$ x 1000)	\$ 373,483.7	\$ 372,738.6	Total System (\$ x 1000)	\$ 376,825.8	100%	\$ 376,827.0	100%	\$ (745.2)	\$ 1.2	\$ 3,342.1	\$ 4,088.5

Idaho Power/109
Witness: Nicole A. Blackwell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell
Idaho Power Company's Rate Spread for APCU October Update

October 31, 2019

Idaho Power Company
Stipulated Revenue Spread
2020 October Update

Line No.

1	2020 October Update Oregon Jurisdictional Share of Base NPSE = \$25.10/MWh x 695,285.576 MW/hs = Oregon Allocated EIM Costs	\$17,451,668 \$145,713
3	Proposed October Update APCU Revenue Requirement	\$17,597,381

	TOTAL SYSTEM	RESIDENTIAL (1)	GEN SRV (7)	GEN SRV SECONDARY (9-S)	GEN SRV PRIMARY (9-P)	GEN SRV TRANS (9-T)	AREA LIGHTING (15)	LG POWER PRIMARY (19-P)	LG POWER TRANS (19-T)	IRRIGATION SECONDARY (24-S)	UNMETERED GEN SERVICE (40)	MUNICIPAL ST LIGHT (41)	TRAFFIC CONTROL (42)	
4	April 2020 - March 2021 Generation Level Normalized Sales (kWh)	748,721,878	200,415,526	20,601,767	130,871,344	16,511,521	2,945,056	474,418	183,215,969	119,255,488	73,423,976	5,904.00	976,356.00	24,553.00
5	Class Share of April 2020 - March 2021 Generation Level Normalized Sales (kWh)	100%	26.77%	2.75%	17.48%	2.21%	0.39%	0.06%	24.47%	15.93%	9.81%	0.00%	0.13%	0.00%
6	2020 October Update Class Allocated Base NPSE	\$ 17,597,381	\$ 4,710,412	\$ 484,208	\$ 3,075,899	\$ 388,074	\$ 69,218	\$ 11,150	\$ 4,306,167	\$ 2,802,889	\$ 1,725,700	\$ 139	\$ 22,948	\$ 577
7	June 2020 - May 2021 Loss-Adjusted Normalized Sales (kWh)	696,508,751	182,860,882	18,824,509	119,604,569	15,581,878	2,848,217	432,863	172,937,798	115,505,413	66,993,996	5,388	890,836	22,402
8	Proposed APCU Rates for 2020 October Update (\$/kWh)	0.025265	0.025760	0.025722	0.025717	0.024905	0.024302	0.025760	0.024900	0.024266	0.025759	0.025754	0.025760	0.025760
9	Proposed October Update APCU Revenue Requirement	\$17,597,381	\$4,710,412	\$484,208	\$3,075,899	\$388,074	\$69,218	\$11,150	\$4,306,167	\$2,802,889	\$1,725,700	\$139	\$22,948	\$577

10	APCU Rates for 2019 October Update (\$/kWh) - Order No. 19-189	0.024477	0.026372	0.026342	0.026341	0.025504	0.024880	0.026372	0.025504	0.022731	0.026355	0.026366	0.026372	0.024477
11	June 2020 - May 2021 Loss-Adjusted Normalized Sales (kWh)	696,508,751	182,860,882	18,824,509	119,604,569	15,581,878	2,848,217	432,863	172,937,798	115,505,413	66,993,996	5,388	890,836	22,402
12	Base NPSE Recovered under Current APCU Rates	\$17,774,324	\$4,822,354	\$495,872	\$3,150,445	\$397,405	\$70,863	\$11,415	\$4,410,592	\$2,625,595	\$1,765,599	\$142	\$23,493	\$548

Idaho Power/110
Witness: Nicole A. Blackwell

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

IDAHO POWER COMPANY

Exhibit Accompanying Testimony of Nicole A. Blackwell

**Idaho Power Company's Current Base Revenue to
Proposed Base Revenue**

October 31, 2019

Idaho Power Company
Calculation of Revenue Impact
State of Oregon
APCU October Update
Effective June 1, 2020

Summary of Revenue Impact
Current Base Revenue to Proposed Base Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers	Normalized Energy (kWh) ⁽¹⁾	Current Base Revenue	Proposed Adjustments to Base Revenue	Proposed Base Revenue	Percent Change Base to Base Revenue
<u>Uniform Tariff Rates:</u>								
1	Residential Service	1	13,472	182,860,882	\$17,744,879	(\$111,942)	\$17,632,937	(0.63)%
2	Small General Service	7	2,665	18,824,509	\$2,033,369	(\$11,664)	\$2,021,705	(0.57)%
3	Large General Secondary	9S	943	119,604,569	\$9,589,128	(\$74,546)	\$9,514,583	(0.78)%
4	Large General Primary	9P	5	15,581,878	\$1,134,364	(\$9,331)	\$1,125,032	(0.82)%
5	Large General Transmission	9T	1	2,848,217	\$189,665	(\$1,645)	\$188,020	(0.87)%
6	Dusk to Dawn Lighting	15	0	432,863	\$107,901	(\$265)	\$107,636	(0.25)%
8	Large Power Primary	19P	6	172,937,798	\$11,067,822	(\$104,426)	\$10,963,396	(0.94)%
9	Large Power Transmission	19T	1	115,505,413	\$7,101,652	\$177,294	\$7,278,946	2.50%
10	Agricultural Irrigation Service	24	2,050	66,993,996	\$6,709,535	(\$39,899)	\$6,669,637	(0.59)%
11	Unmetered General Service	40	2	5,388	\$390	(\$3)	\$386	(0.85)%
12	Street Lighting	41	26	890,836	\$148,333	(\$545)	\$147,788	(0.37)%
13	Traffic Control Lighting	42	8	22,402	\$2,229	\$29	\$2,257	1.29%
14	Total Uniform Tariffs		19,179	696,508,751	55,829,266	(176,943)	55,652,323	(0.32)%
15	Total Oregon Retail Sales		19,179	696,508,751	55,829,266	(176,943)	55,652,323	(0.32)%

(1) Updated June 2020-May 2021 Test Year

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on the parties to Docket UE 350, Idaho Power's 2019 Adjusted Power Cost Update, on the date indicated by email addressed to said person(s) at his or her last-known address(es) indicated below.

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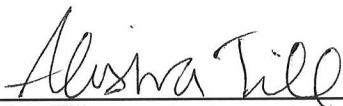
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DATED: October 31, 2019