

McDowell Rackner & Gibson PC



WENDY MCINDOO
Direct (503) 595-3922
wendy@mcd-law.com

May 15, 2012

VIA ELECTRONIC AND U.S. MAIL


PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UE 248 -- In the Matter of the Application of Idaho Power Company for Authority to Increase its Rates and Charges for Electric Service to its Customers in the State of Oregon Due to the Inclusion of the Langley Gulch Power Plant Investment in Rate Base.

Attention Filing Center:

Enclosed in the above-referenced docket are an original and one copy of Idaho Power's Affidavit of Gregory W. Said Regarding Notice of Proposed Rate Revision. A copy of this filing has been served on all parties to this proceeding as indicated on the attached Certificate of Service.

Very truly yours,


Wendy McIndoo
Office Manager

Enclosures

cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket No. UE 248 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.

OPUC dockets
Citizens' Utility Board of Oregon
dockets@oregoncub.org

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

Catriona McCracken
Citizens' Utility Board of Oregon
catriona@oregoncub.org

Stephanie Andrus
Assistant Attorney General
stephanie.andrus@state.or.us

Steve Schue
Public Utility Commission of Oregon
steve.schue@state.or.us

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

Robert D. Kahn
NW & Intermountain Power Producers
Coalition
rkahn@nippc.or
rkahn@rdkco.com

Gregory M. Adams
Richardson & O'Leary
greg@richardsonandoleary.com

Peter J. Richardson
Richardson & O'Leary
peter@richardsonandoleary.com

DATED: May 15, 2012



Wendy McIndoo
Office Manager

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**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 248

IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER COMPANY FOR)
AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR ELECTRIC SERVICE)
TO ITS CUSTOMERS IN THE STATE OF)
OREGON DUE TO THE INCLUSION OF THE)
LANGLEY GULCH POWER PLANT)
INVESTMENT IN RATE BASE.)

**AFFIDAVIT OF GREGORY W.
SAID REGARDING NOTICE OF
PROPOSED RATE REVISION**

STATE OF IDAHO)
) ss.
County of Ada)

I, Gregory W. Said, being first duly sworn on oath, depose and say:

1. My full name is Gregory W. Said. I am employed by Idaho Power Company as Vice President of Regulatory Affairs.
2. Idaho Power Company filed with the Public Utility Commission of Oregon its Request for a rate revision on March 9, 2012.
3. Pursuant to OAR 860-022-0017, Idaho Power Company caused to be published in the following newspapers of general circulation in the communities served by Idaho Power Company (Argus-Observer – Ontario, Oregon, Hells Canyon Journal – Halfway, Oregon) as well as two newspapers in Baker City, Oregon (The Baker City Herald and The Record Courier) a display advertisement announcing the rate revision. The Ad ran on Wednesday, March 21, 2012, in the *Argus Observer*. The Ad size in the *Argus Observer* was 8.306 inches wide by 10 inches tall. The Ad also ran on Wednesday,

1 March 21, 2012, in the *Hells Canyon Journal*. The ad size in the *Hells Canyon Journal*
2 was 7.75 inches wide by 10 inches tall. The Ad also ran on Wednesday, March 21, 2012,
3 in the *Baker City Herald*. The Ad size in the *Baker City Herald* was 7.79 inches wide by 10
4 inches tall. The Ad also ran on Thursday, March 22, 2012, in the *Baker City Record-*
5 *Courier*. The Ad size in the *Baker City Record-Courier* was 9 inches wide by 10 inches
6 tall. A copy of the display announcement is attached to this Affidavit as Exhibit A (actual
7 size published is listed above). The Affidavits of Publication from the aforementioned
8 newspapers are attached as Exhibit B.

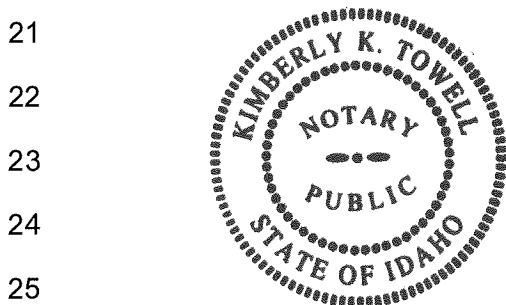
9 4. Additionally, a bill stuffer was included in each Oregon customer's March and
10 April bills mailed March 27, 2012, through April 24, 2012, informing them that Idaho Power
11 Company filed for a rate revision. A copy of that bill stuffer is attached to this Affidavit as
12 Exhibit C.

13 I declare under penalty of perjury under the laws of the state of Idaho that the
14 foregoing is true and correct based on my information and belief.

15 DATED this 11th day of May, 2012.

16
17 
18 _____
Gregory W. Said

19 SUBSCRIBED AND SWORN to before me this 11th day of May, 2012.




21
22 
23 _____
Notary Public for Idaho
24 Residing at: Star, Idaho
25 My Commission Expires on: 12-20-2014

EXHIBIT A
ADVERTISEMENT



Important Information About Your Idaho Power Rates

Idaho Power customers benefit from some of the lowest electricity rates in the nation. And although those rates sometimes change, at the end of the day we still pay a bargain price for electric service.

On March 9 Idaho Power asked the Public Utility Commission of Oregon (OPUC) to review and adjust rates to reflect the approximately \$391 million in investments we have made to construct and integrate the new Langley Gulch Power Plant into our operating system. The 300 megawatt gas-fired power plant is located just off I-84 near New Plymouth, Idaho, about 10 miles east of Ontario, Oregon. It was constructed to deliver power to our Oregon and Idaho customers.

The Langley Gulch revenue deficiency for Idaho Power's Oregon jurisdiction is \$3 million. An increase in Oregon annual billed revenue of 6.84 percent is needed in order to recover those funds. If approved, the associated Oregon rate change would take effect July 1, 2012 to coincide with the power plant's availability to serve high summer energy demand in July.

Net Effect

The net effect of this filing to customers varies depending on rate schedule. If the proposal is approved as filed, Idaho Power's average Oregon residential customer who uses 1,240 kilowatt-hours per month would see an increase in their monthly bill of \$6.35 from current rates beginning July 1. A summary of the proposed changes to Oregon rates is shown below.

Revenue Impact By Class: Percentage Change from Current Billed Rates

	Residential	Small General Service	Large General Service	Large Power	Irrigation	Overall Change
Langley Gulch Cost Recovery	5.86%	4.90%	6.75%	8.38%	7.01%	6.84%

Why We're Requesting This Increase

Powering the future means changes — both in electrical infrastructure and in rates.

This proposed rate change is important for Idaho Power to achieve fair and timely recovery of investments, such as the Langley Gulch Power Plant, it has already made in its electrical system, which today's rates do not fully provide.

Customer demand on our system comes from all parts of our service area. Oregon demand is growing as well as Idaho, and all customers in our service area benefit from system improvements needed to continue to provide safe and reliable electric service to our customers.

Public Involvement

Copies of our filings are available on our website at www.idahopower.com/oregonrates, and also will be posted on the OPUC website, www.puc.state.or.us. Idaho Power's testimony and exhibits are also available for customer review at our Payette Operations Center, 1550 S. Main Street, Payette, Idaho, and at our corporate headquarters at 1221 W. Idaho Street, Boise, Idaho, or by mailing a request to the Public Utility Commission of Oregon, 550 Capitol St. NE #215, P.O. Box 2148, Salem, OR, 97308-2148. Customers also may call Idaho Power at 1-800-488-6151 or OPUC at 1-800-522-2404 for more information.

This notice is to provide Idaho Power's Oregon customers with general information about a recently proposed rate increase and how, if approved, it would affect customers. Calculations and statements made in this notice will not be binding upon the Public Utility Commission of Oregon (OPUC).

Si le gustaría esta información en Español, favor de llamar Idaho Power al 1-800-488-6151, gratis.

We value your business and appreciate you taking the time to read this notice. Thank you.

EXHIBIT B

AFFIDAVITS OF PUBLICATION

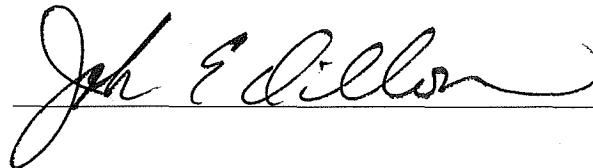
1160 S.W. 4th St.
Ontario, Oregon 97914
Phone 541-889-5387 1-800-945-4223
FAX 541-889-3347
www.argusobserver.com

AFFIDAVIT OF PUBLICATION

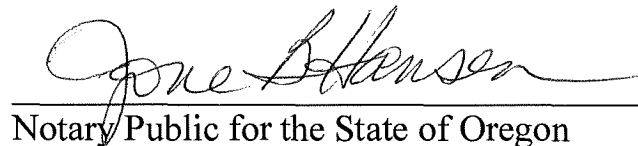
IDAHO POWER

IDAHO POWER RATES

I, John Dillon, being first duly sworn, depose and say that I am the Publisher of the Argus Observer, a newspaper of general circulation as defined by Sections 1-509, 1-510, Oregon Code, printed and published at the City of Ontario in Malheur County, the state of Oregon; that 1 insertion of the above named ad did run in said newspaper on date of March 21, A.D. 2012.

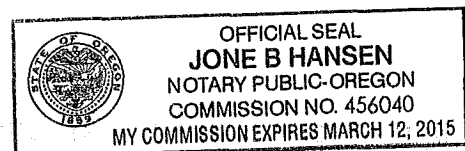


Subscribed and sworn to before me this 24 day of April, A.D. 2012.



Notary Public for the State of Oregon

My commission expires March 12th, 2015.
Malheur County
State of Oregon



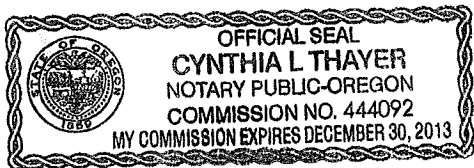
AFFIDAVIT OF PUBLICATION

I, Steve Backstrom, being first duly sworn, affirm that I am the Publisher of the *Hells Canyon Journal*, a weekly newspaper of general circulation published in the City of Halfway, Baker County, State of Oregon; that such newspaper is made up of at least eight (8) pages of six (6) columns each, of at least twenty-one (21) inches in depth of type matter; that such newspaper was regularly and uninterruptedly published once each week for at least twelve (12) consecutive months immediately preceding the first publication of the attached notice, and has more than two-hundred (200) bona fide subscribers within said county; that the attached display ad for Idaho Powder of which one hereto attached is a true and correct copy as printed, was published in the regular and entire issue of said newspaper and not in any supplement thereof, once each week for 1 successive and consecutive weeks, commencing with the issue dated the 21st day of March, 2012; ending with the issue dated the 21st day of March, 2012; and that the amount of charge made and to be collected by such newspaper for such publication is \$ 184.00.

Steve Backstrom
Steve Backstrom

State of OREGON
County of Baker

Signed and sworn to before me on April 27, 2012



Cynthia L Thayer
Notary Public – State of Oregon
My Commission expires December 30, 2013

Baker City Herald

www.bakercityherald.com

1915 First Street, Baker City, Oregon 97814--(541) 523-3673--fax: (541) 523-6426

AFFIDAVIT OF PUBLICATION STATE OF OREGON, COUNTY OF BAKER

I, **Julie Ferdig** a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not party to or interested in the below-entitled matter. I am the principal clerk of the printer of the Baker City Herald a daily newspaper of general circulation, published in the aforesaid county and state as defined by ORS 193.010 and ORS 193.020, that

Acct. Name: Idaho Power

Ticket No. 78393

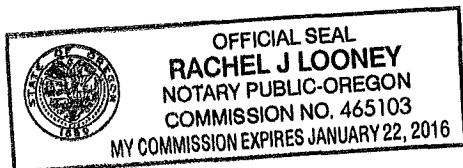
Description: Idaho Power Rates

a printed copy of which is hereto affixed was published in each regular and entire issue of the said newspaper on the following dates, to wit:

March 21, 2012

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Baker City, Oregon this 22 day of March , 2012



Julie Ferdig

Rachel J. Looney

Notary Public of Oregon

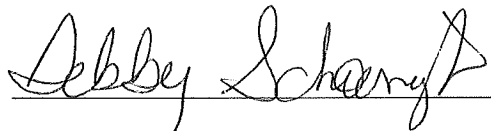
The Record-Courier
PO Box 994
Baker City, OR 97814
541-856-3886

AFFIDAVIT OF PUBLICATION

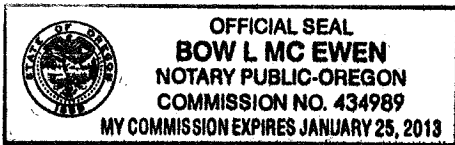
State of Oregon, County of Baker, ss.

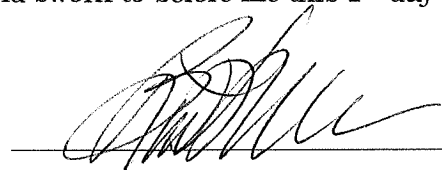
I, Debby Schoeningh, being first duly sworn, depose and say that I am the **EDITOR** - Printer of The Record-Courier, which is a weekly newspaper of general circulation published in Baker City, in said County and State; that such newspaper is made of of at least four pages of five columns each and of at least 17 3/4 inches in depth of type matter; that such newspaper was regularly and uninterruptedly published once each week for at least twelve consecutive months immediately preceding the first publication of the attached **PUBLIC NOTICE** and has more than 200 bona fide subscribers within said county; that the **PUBLIC NOTICE** of which the one hereto attached is a true and correct copy as printed, was published in the regular and entire issue of said news paper and not in any supplement thereof, once each week for **2** Successive weeks, being published **2** times, commencing with the issue dated the **22nd day of March, 2012**, and ending with the issue dated **22nd day of March, 2012**.

That the amount of charge actually made and to be collected by such newspaper for publication is \$ **\$230.00** .



Subscribed and sworn to before me this **1st day of May, 2012**.





Notary Public for Oregon.

My Commission expires January 25, 2013.

EXHIBIT C

BILL STUFFER



Apreciamos su negocio y agradecemos la atención prestada a este aviso.
Gracias.

Información importante acerca de las tarifas de Idaho Power

Participación pública

En el sitio en internet www.idahopower.com/oregonrates encontrarán copias de nuestras solicitudes, así como en el sitio en internet de la OPUC, www.puc.state.or.us. La declaración y las pruebas de Idaho Power también se encuentran para revisión de los clientes en nuestro Centro de Operaciones Payette, 1550 S. Main Street, Payette, Idaho, y en nuestras oficinas corporativas en 1221 W. Idaho Street, Boise, Idaho o pueden enviar por correo una petición a la Comisión de Servicios Públicos de Oregon: Public Utility Commission of Oregon, 550 Capitol St. NE #215, P.O. Box 2148, Salem, OR, 97308-2148. Para más información, los clientes también pueden llamar a Idaho Power a 1-800-488-6151 o a la OPUC al 1-800-522-2404.

Este aviso es para ofrecer a los clientes de Idaho Power de Oregon información general acerca del incremento a las tarifas recientemente propuesto y, de aprobarse, la forma en que afectaría a los clientes. Los cálculos y las declaraciones establecidos en este aviso no son obligatorios para la Comisión de Servicios Públicos de Oregon (OPUC).

Los clientes de Idaho Power obtienen los beneficios de unas de las tarifas de electricidad más bajas de la nación. Y aun cuando estas tarifas a veces cambian, finalmente pagamos un precio económico por el servicio eléctrico.

El 9 de marzo, Idaho Power pidió a la Comisión de Servicios Públicos de Oregon (OPUC, Public Utility Commission of Oregon) que revisara y ajustara las tarifas a fin de que reflejen la inversión de aproximadamente \$391 millones que hemos hecho para construir e incorporar a nuestro sistema operativo la nueva Planta de Energía Langley Gulch. La planta eléctrica de gas de 300 megawatts se encuentra justo saliendo de I-84 cerca de New Plymouth, Idaho, alrededor de 10 millas al este de Ontario, Oregon. Se construyó para proporcionar energía a nuestros clientes de Oregon y Idaho.

El déficit en los ingresos de Langley Gulch para la jurisdicción de Oregon de Idaho Power es de \$3 millones. Se necesita un incremento en los ingresos anuales facturados de Oregon de 6.84 por ciento a fin de recuperar los fondos. De aprobarse, el cambio en la tarifa asociada de Oregon entraría en vigor el 1o de Julio de 2012 a fin de coincidir con la disponibilidad de la planta eléctrica de dar servicio a la demanda de energía de verano en Julio.



Efecto neto

El efecto neto a los clientes en cuanto a esta solicitud depende del programa de tarifas. Si la propuesta se aprueba como se presentó, el incremento en el recibo mensual del cliente residencial promedio de Oregon de Idaho Power que consume 1,240 kilowatt-hora al mes sería de \$6.35 sobre la tarifa actual a partir el 1o de julio. A continuación se presenta un resumen de los cambios propuestos a las tarifas de Oregon.

Por eso solicitamos este incremento

Proporcionar energía a futuro significa cambios — tanto de infraestructura eléctrica como en las tarifas.

Este cambio en las tarifas propuestas es importante para que Idaho Power logre una recuperación de la inversión justa y oportuna, en este caso la Planta de energía Langley Gulch, SH, que no generan por completo las tarifas actuales.

La demanda de los clientes sobre nuestro sistema proviene de todas nuestras áreas de servicio. Las demandas de Oregon y Idaho crecen y los clientes de nuestra área de servicio obtienen beneficios de las mejoras en el sistema necesarias para seguir ofreciendo a nuestros clientes un servicio eléctrico seguro y confiable.

Impacto de los ingresos por clase: Cambio porcentual a partir de las tarifas actuales facturadas

	Residencial	Servicio general pequeño	Servicio general grande	Consumo grande de energía	Riego	Cambio en general
Recuperación de costos en Langley Gulch	5.86%	4.90%	6.75%	8.38%	7.01%	6.84%



We value your business and appreciate you taking the time to read this notice. Thank you.

Important Information About Idaho Power Rates

Public Involvement

Copies of our filings are available on our website at www.idahopower.com/oregonrates, and also will be posted on the OPUC website, www.puc.state.or.us. Idaho Power's testimony and exhibits are also available for customer review at our Payette Operations Center, 1550 S. Main Street, Payette, Idaho, and at our corporate headquarters at 1221 W. Idaho Street, Boise, Idaho, or by mailing a request to the Public Utility Commission of Oregon, 550 Capitol St. NE #215, P.O. Box 2148, Salem, OR, 97308-2148. Customers also may call Idaho Power at 1-800-488-6151 or OPUC at 1-800-522-2404 for more information.

This notice is to provide Idaho Power's Oregon customers with general information about a recently proposed rate increase and how, if approved, it would affect customers. Calculations and statements made in this notice will not be binding upon the Public Utility Commission of Oregon (OPUC).

Si le gustaría esta información en Español, favor de llamar Idaho Power al 1-800-488-6151, gratis.

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On March 9 Idaho Power asked the Public Utility Commission of Oregon (OPUC) to review and adjust rates to reflect the approximately \$391 million in investments we have made to construct and integrate the new Langley Gulch Power Plant into our operating system. The 300 megawatt gas-fired power plant is located just off I-84 near New Plymouth, Idaho, about 10 miles east of Ontario, Oregon. It was constructed to deliver power to our Oregon and Idaho customers.

The Langley Gulch revenue deficiency for Idaho Power's Oregon jurisdiction is \$3 million. An increase in Oregon annual billed revenue of 6.84 percent is needed in order to recover those funds. If approved, the associated Oregon rate change would take effect July 1, 2012 to coincide with the power plant's availability to serve high summer energy demand in July.



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The net effect of this filing to customers varies depending on rate schedule. If the proposal is approved as filed, Idaho Power's average Oregon residential customer who uses 1,240 kilowatt-hours per month would see an increase in their monthly bill of \$6.35 from current rates beginning July 1. A summary of the proposed changes to Oregon rates is shown below.

Why We're Requesting This Increase

Powering the future means changes — both in electrical infrastructure and in rates.

This proposed rate change is important for Idaho Power to achieve fair and timely recovery of investments, in this case the Langley Gulch Power Plant, which today's rates do not fully provide.

Customer demand on our system comes from all parts of our service area. Oregon demand is growing as well as Idaho, and all customers in our service area benefit from system improvements needed to continue to provide safe and reliable electric service to our customers.

Revenue Impact By Class: Percentage Change from Current Billed Rates

	Residential	Small General Service	Large General Service	Large Power	Irrigation	Overall Change
Langley Gulch Cost Recovery	5.86%	4.90%	6.75%	8.38%	7.01%	6.84%