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April 5, 2019

VIA ELECTRONIC FILING

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

Re: Docket No. UE 350 – In the Matter of Idaho Power Company’s 2019 Annual Power Cost Update

Attention Filing Center:

Attached for filing in the above-captioned docket is Idaho Power Company’s Unopposed Motion to Amend Procedural Schedule – Expedited Consideration Requested.

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Wendy McIndoo".

Wendy McIndoo
Office Manager

Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 350

In the Matter of
IDAHO POWER COMPANY
2019 Annual Power Cost Update.

UNOPPOSED MOTION TO AMEND
PROCEDURAL SCHEDULE

Expedited Consideration Requested

1 Pursuant to OAR 860-001-0420, Idaho Power Company (“Idaho Power” or “Company”)
2 submits this Unopposed Motion to Amend Procedural Schedule. Idaho Power requests the
3 following modifications to the current procedural schedule to accommodate the filing of limited
4 supplemental testimony and to facilitate additional settlement discussions. Staff and the
5 Oregon Citizens’ Utility Board (“CUB”) support the Company’s request.

6 First, Idaho Power requests a modification to include the filing of supplemental March
7 Forecast testimony on April 8, 2019. Idaho Power’s limited supplemental testimony will present
8 a methodology for quantifying the benefits resulting from Idaho Power’s participation in the
9 Western Energy Imbalance Market, as described in the Company’s March Forecast testimony
10 filed on March 25, 2019.¹

11 Second, to accommodate review of its supplemental testimony and allow additional
12 settlement discussions, Idaho Power requests that Staff and CUB file their testimony on the
13 Company’s March Forecast on April 24, 2019, instead of on April 10, 2019.

¹¹ See Idaho Power/200, Blackwell/18 (“As stated in the October Update testimony, Idaho Power intended to perform a detailed review of the CAISO benefit calculation because the Company believes the methodology overstates benefits, particularly around the Company’s hydro units. Idaho Power has been actively working with Power Settlements and CAISO to shadow and validate CAISO’s benefit calculation. Additionally, the Company is continuing to develop a methodology to quantify actual benefits achieved through EIM participation, which will serve as the basis for forecasting EIM benefits. As the methodology for quantifying actual benefits is not yet finalized, the Company is relying on the E3 study to estimate EIM benefits in the interim. The Company expects the methodology for quantifying actual benefits will be finalized within the next two weeks and intends to supplement the March Forecast testimony with the results of that analysis.”) (emphasis added).

1 Third, Idaho Power requests that the date for all parties to file reply testimony be
2 removed from the schedule. Currently, the schedule calls for all parties to file reply testimony
3 on April 24, 2019.

4 All other dates in the current procedural schedule will remain unchanged. As noted in
5 the Prehearing Conference Memorandum of December 20, 2018, if parties are unable to reach
6 a settlement by May 8, 2019, the schedule will be suspended, and a prehearing conference
7 will be held to establish additional dates for all parties to file reply testimony and for hearing
8 and briefing.

9 In accordance with OAR 860-001-0420(6), Idaho Power has conferred with Staff and
10 the CUB and both parties support the requested modifications to the procedural schedule.
11 Idaho Power respectfully requests expedited consideration of this Motion given that it intends
12 to file supplemental testimony on April 8, 2019, and the current deadline for Staff and CUB to
13 file testimony is April 10, 2019.

DATED: April 5, 2019.

McDOWELL RACKNER GIBSON PC



Adam Lowney

IDAHO POWER COMPANY

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