

ELIZABETH PAYNTER Legal Administrative Assistant epaynter@idahopower.com (208) 388-5259

December 20, 2013

VIA ELECTRONIC FILING AND U.S. MAIL

Attention: Filing Center Public Utility Commission of Oregon 3930 Fairview Industrial Drive SE P.O. Box 1088 Salem, Oregon 97308-1088

Re: **Docket UM 1464(4)**

In the Matter of Idaho Power Company's Deferred Accounting of Net Variable Power Cost Variances – Idaho Power Company's Application

Dear Filing Center:

Enclosed for filing in Docket UM 1464(4) are an original and five (5) copies of Idaho Power Company's Application for Deferred Accounting of Net Variable Power Cost Variances. Confidential Attachment B is being provided confidentially pursuant to OAR 860-001-0070 and Protective Order No. 12-499 previously issued in this docket.

The Application has been served on the parties to the UE 233 and UM 1464 service lists as indicated in the Certificate of Service.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

Elizabeth Paynter

Enclosures

1221 W. Idaho St. (83702) P.O. Box 70 Boise, ID 83707

	BEFORE THE PUBLIC UTILITY COMMISSION			
1	OF OREGON			
2	UM 1464(4)			
3				
4	In the Matter of Idaho Power Company's Application for Deferred Accounting of Net	APPLICATION		
5	Variable Power Cost Variances			
6				
7	I. INTRODUCTION			
8	Pursuant to ORS 757.210, ORS 757.2	59, and OAR 860-027-0300, Idaho Power		
9	Company ("Idaho Power") hereby requests an	accounting order reauthorizing Idaho Power		
10	to defer for later ratemaking treatment annual n	et variable power cost variances pursuant to		
11	Order No. 08-238 and Idaho Power Tariff Sc	hedule 56. Schedule 56 is an "automatic		
12	adjustment clause" as defined in ORS 757.210. Idaho Power seeks authorization for this			
13	deferral effective as of January 1, 2014. In support of this Application, Idaho Power states:			
14	1. Idaho Power is a public utility in	the state of Oregon and its rates, services,		
15	and accounting practices are subject to the regulation of the Public Utility Commission of			
16	Oregon ("Commission").			
17	2. This Application is filed pursu	ant to ORS 757.259, which allows the		
18	Commission, upon application, to authorize the	deferral of certain items for later inclusion in		
19	rates.			
20	3. Communications regarding this A	pplication should be address to:		
21	Lisa D. Nordstrom	Courtney Waites		
22	Regulatory Dockets Idaho Power Company	Idaho Power Company 1221 West Idaho Street		
23	1221 West Idaho Street P.O. Box 70	P.O. Box 70 Boise, Idaho 83707		
24	Boise, Idaho 83707	cwaites@idahopower.com		
25	<u>Inordstrom@idahopower.com</u> dockets@idahopower.com			
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(A)

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II. OAR 860-027-0300(3) REQUIREMENTS

A. <u>Description</u>

With this deferral application, Idaho Power seeks authorization from the Commission to accrue, for future amortization, the difference between actual annual net variable power costs and the annual net variable power costs forecasted pursuant to Tariff Schedule 55, in accordance with Order No. 08-238. The annual variance will be determined pursuant to the terms of Schedule 56, which includes a Power Supply Expense Deadband and an Earnings Test.

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B. <u>Reasons for Deferral</u>

10 In Order No. 08-238, the Commission ordered the adoption of a power cost 11 adjustment mechanism for Idaho Power that contains both an Annual Power Cost Update 12 ("APCU") and Power Cost Adjustment Mechanism ("PCAM"). Idaho Power Schedule 55 13 contains the terms of the APCU while Schedule 56 contains the terms of the PCAM. The 14 PCAM provides for recognition in rates of the difference, for a given year, between the 15 actual annual net variable power costs incurred by Idaho Power and the net annual variable 16 power costs recovered pursuant to Idaho Power Schedule 55. This deferral is intended to 17 capture the net annual variable power cost difference that will be amortized in rates.

This deferral is filed pursuant to Order No. 08-238 and ORS 757.259(2)(e). This deferral will minimize the frequency of rate changes or the fluctuation of rate levels and match appropriately the costs borne by and benefits received by customers.

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C. Proposed Accounting

Idaho Power records revenues and expenses that would be subject to the deferral
 order in accordance with the Code of Federal Regulations (CFR) to FERC Account 501
 (Fuel), FERC Account 547 (Fuel), FERC Account 447 (Sales for Resale), and FERC 555
 (Purchased Power). Upon receiving approval of a deferral, Idaho Power proposes to

record the Deferred Amount by debiting FERC Account 182.3 (Regulatory Assets);
 crediting FERC Account 557 (Other Expenses) if there is an amount to collect from
 customers. If there is a refund to customers, Idaho Power would record the Accrued
 Amount in FERC Account 254 (Regulatory Liabilities); debiting FERC Account 557 (Other
 Expenses).

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D. Estimate of Amounts

7 The Deferred Amount is a function of several unknown and unpredictable factors 8 including customer usage, the wholesale market price for electricity, and the wholesale 9 market price for natural gas. Because the Deferred Amount is dependent on factors that 10 cannot be precisely forecast, Idaho Power cannot provide a precise estimate of the 11 Deferred Amount. Idaho Power requests that, in accordance with Order No. 05-1070, it be 12 allowed to accrue interest on the unamortized balance at a rate equal to its authorized 13 weighted average cost of capital most recently approved by the Commission.

14 E. <u>Notice</u>

A copy of the Notice of Application for Deferred Accounting of Excess Power Costs
and a list of persons served with the Notice are attached to the Application as Attachment
A.

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

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A. Entries in the Deferred Account to Date

Attached to the Application as Attachment B is a description and explanation of the entries in this deferred account as of the date of the Application. The attachment includes unreported financial information and is confidential pursuant to OAR 860-001-0070 and Protective Order No. 12-499 previously issued in this docket.

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B. Reason for Continuation of Deferred Accounting

As discussed in detail above, this deferral is intended to capture the net annual variable power cost difference that will be amortized in rates and is authorized pursuant to Order No. 08-238.

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IV. CONCLUSION

6 Deferred accounting treatment is an appropriate, just, and reasonable means of 7 implementing Order No. 08-238 and Idaho Power Schedule 56.

8 For the reasons stated above, Idaho Power requests permission to defer annual net
9 variable power cost variances pursuant to Order No. 08-238 and Idaho Power Schedule 56.

10 DATED this 20th day of December 2013.

IDAHO POWER COMPANY

LISA D. NORDSTROM Attorney for Idaho Power Company

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ATTACHMENT A

4	BEFORE THE PUBLIC UTILITY COMMISSION		
1	OF OREGON		
2	UM 1464(4)		
3	1		
4	In the Matter of Idaho Power Company's Application for Deferred Accounting of Net	NOTICE OF APPLICATION FOR	
5	Variable Power Cost Variances	DEFERRED ACCOUNTING OF NET VARIABLE POWER COST VARIANCES	
6			
7	On December 20, 2013, Idaho Power C	ompany ("Idaho Power") filed an application	
8	with the Public Utility Commission of Oregon ("Commission") for an Order authorizing		
9	deferral of the annual net variable power cost variance pursuant to Order No. 08-238 and		
10	Idaho Power Tariff Schedule 56.		
11	Approval of Idaho Power's Application will not authorize a change in Idaho Power's		
12	rates, but will permit the Commission to consider allowing such deferred amounts in rates in		
13	a subsequent proceeding.		
14	Idaho Power's Application will be posted on the Commission website for persons		
15	who wish to obtain a copy or they may contact the following:		
16	Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street P.O. Box 70 Boise, Idaho 83707		
17			
18			
19	Inordstrom@idahopower.com		
20	Any person who wishes to submit written comments to the Commission on Idaho		
21	Power's Application must do so by no later than January 17, 2014.		
22	DATED this 20 th day of December 2013.		
23	ID/	AHO POWER COMPANY	
24		P. DM	
25		SAD NORDSTROM	
26	Att	orney for Idaho Power Company	
Page 1	- NOTICE OF APPLICATION	Idaho Power Company	

1221 West Idaho Street Boise, ID 83702

ATTACHMENT B IS CONFIDENTIAL PURSUANT TO OAR 860-001-0070 AND PROTECTIVE ORDER NO. 12-499

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2	CERTIFICATE OF SERVICE UM 1464(4)		
3	I hereby certify that on December 20, 2013, I served a true and correct copy of		
4	Idaho Power Company's Application for Deferred Accounting of Net Variable Power Cost		
5	Variances and the Notice of Application, Attachment A, on the parties in Dockets UE 233		
6	and UM 1464 by e-mail to said person(s) as indicated below.		
7	G. Catriona McCracken	Robert Jenks Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400 Portland, Oregon 97205	
8	Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400		
9	Portland, Oregon 97205 catriona@oregoncub.org	bob@oregoncub.org	
10	OPUC Dockets	Megan Decker	
11	Citizens' Utility Board of Oregon 610 SW Broadway, Suite 400	Renewable Northwest Project 421 SW 6 th Avenue, Suite 1125 Betland, Oregon 97204	
12	Portland, Oregon 97205 dockets@oregoncub.org	Portland, Oregon 97204 megan@rnp.org	
13	Wendy Gerlitz	Lisa F. Rackner	
14	NW Energy Coalition 1205 SE Flavel Street	McDowell Rackner & Gibson PC 419 SW 11th Avenue, Suite 400 Portland, Oragon 07205	
15	Portland, Oregon 97202 wendy@nwenergy.org	Portland, Oregon 97205 dockets@mcd-law.com	
16	Oregon Dockets	Don Reading 6070 Hill Road	
17	PacifiCorp 825 NE Multnomah Street, Suite 2000	Boise, Idaho 83703	
18	Portland, Oregon 97232 oregondockets@pacificorp.com	dreading@mindspring.com	
19	Joshua D. Johnson	Irion A. Sanger Davison Van Cleve	
20	Attorney At Law 101 S. Capitol Blvd., Suite 300 Baisa, Idaha 82702	333 SW Taylor, Suite 400	
21	Boise, Idaho 83702 jdj@racinelaw.net	Portland, Oregon 97204 ias@dvclaw.com	
22	Melinda J. Davison Davison Van Cleve PC	John W. Stephens Esler Stephens & Buckley 888 SW Fifth Ave, Suite 700 Portland, Oregon 97204 <u>stephens@eslerstephens.com</u> mec@eslerstephens.com	
23	333 SW Taylor, Suite 400		
24	Portland, Oregon 97204 mjd@dvclaw.com		
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26			
		Idaho Power Company	

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2	R. Bryce Dalley Pacific Power 825 NE Multnomah Street, Suite 2000	Sarah Wallace Pacific Power 825 NE Multnom
3	Portland, Oregon 97232 bryce.dalley@pacificorp.com	Portland, Oregor sarah.wallace@j
4	Randy Dahlgren	Douglas C. Ting
5	Portland General Electric 121 SW Salmon Street – 1WTC0702	Douglas C. Ting Portland Genera 121 SW Salmon
6	Portland, Oregon 97204 pge.opuc.filings@pgn.com	Portland, Oregoud doug.tingey@pg
7	Erik Colville	Judy Johnson
8	Public Utility Commission of Oregon P.O. Box 1088	Public Utility Cor P.O. Box 1088
9	Salem, Oregon 97308-1088 erik.colville@state.or.us	Salem, Oregon § judy.johnson@st
10	Stophonia S. Andrug	Eric I Oleon
11	Stephanie S. Andrus Department of Justice Business Activities Section	Eric L. Olsen Racine Olsen N ^v P.O. Box 1391
12	1162 Court Street NE Salem, Oregon 97301-4096	Pocatello, Idaho elo@racinelaw.r
13	stephanie.andrus@state.or.us	•
14	Donald W. Schoenbeck Regulatory & Cogeneration Services	Gregory M. Adar Richardson Adar
15	Inc.	P.O. Box 7218
16	900 Washington Street, Suite 780 Vancouver, Washington 98660-3455 <u>dws@r-c-s-inc.com</u>	Boise, Idaho 837 greg@richardsoi
17		
18	Peter J. Richardson Richardson Adams, PLLC P.O. Box 7218	Anthony J. Yank Utility Net.Inc 29814 Lake Roa
19	Boise, Idaho 83702 peter@richardsonadams.com	Bay Village, Ohio tony@yankel.net
20		
21	DATED this 20 th day of December, 2	013
22		Elin
23		Elizabeth Paynter
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mmission of Oregon 97308-1088 state.or.us

YE Budge & Bailey 83201 net

ms ms, PLLC 702 nadams.com

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Legal Assistant

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