

LISA D. NORDSTROM Lead Counsel Inordstrom@idahopower.com

May 31, 2022

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

Re: Docket No. UM 1853(5)

In the Matter of Idaho Power Company's Application for Deferred Accounting of Certain

Costs Associated with the North Valmy Power Plant

## Attention Filing Center:

Attached for filing is an electronic copy of Idaho Power Company's Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power Plant.

As required by OAR 860-027-0300, the Application has been served on the parties to the UE 233 service list, and the parties to the UE 363 service list, as indicated in the Certificate of Service.

Please contact me at (208) 388-5825 or Regulatory Consultant Courtney Waites at (208) 388-5612 with any questions regarding this filing.

Very truly yours,

Lisa D. Nordstrom

Lin D. Madotrom

LDN/sg Enclosures

1	BEFORE THE PUBLIC UTILITY COMMISSION		
2	OF OREGON		
3	UM 1853 (5)		
4			
	In the Matter of Idaho Power Company's Application for Deferred Accounting of Certain Costs Associated with the North Valmy Power		
5			
6 7	Plant		
		. WITHOU	10 <b>7</b> 1011
8	I. <u>INTRODUCTION</u>		
9	Pursuant to ORS 757.210, ORS 757.259, and OAR 860-027-0300, Idaho Powe		
10	Company ("Idaho Power" or "Company") hereby requests an accounting order reauthorizing		
11	Idaho Power to defer decommissioning revenues collected and decommissioning cost		
12	incurred pursuant to Order No. 17-235. The stipulation approved by Order No. 17-23		
13	includes the collection of the North Valmy Power Plant ("Valmy") amounts and is a		
14	"automatic adjustment clause" ("AAC") as defined in ORS 757.210. Idaho Power seek		
15	reauthorization for this deferral effective as of June 1, 2022. In support of this Application		
16	Idaho Power states:		
17	1.	Idaho Power is a public utility in the	e state of Oregon and its rates, services, and
18		accounting practices are subject	ct to the regulation of the Public Utility
19		Commission of Oregon ("Commiss	sion").
20	2.	This Application is filed pursua	ant to ORS 757.259, which allows the
21		Commission, upon application, to	authorize the deferral of certain items for
22		later inclusion in rates.	
23	3.	Communications regarding this Ap	oplication should be addressed to:
24			
25			
26			

Lisa Nordstrom
Idaho Power Company
P.O. Box 70
Boise, ID 83707

Inordstrom@idahopower.com
dockets@idahopower.com

Courtney Waites
Idaho Power Company
P.O. Box 70
Boise, ID 83707
<a href="mailto:cwaites@idahopower.com">cwaites@idahopower.com</a>

4

5

6

10

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

#### A. <u>Description</u>

With this deferral application, Idaho Power seeks reauthorization from the Commission to defer, for future true-up, decommissioning revenues collected and decommissioning costs incurred in accordance with Order No. 17-235.

### B. Reasons for Deferral

11 On November 2, 2016, Idaho Power filed an application with the Commission requesting approval to update costs associated with Valmy Units 1 and 2 to reflect an end-12 of-life for those units of 2025, and further requested authority to recover all Valmy-related 13 costs by 2025 to align the expected remaining operating life of the plant with cost recovery, resulting in cost recovery from customers who are served by the plant (Docket No. UE 316). 15 In June 2017, the Commission issued Order No. 17-235, approving the recovery of the following expenses and investment associated with Valmy through an AAC: (1) the 17 accelerated depreciation associated with the existing Valmy plant investments through May 18 31, 2017, (2) the return on undepreciated existing capital investments at Valmy until its end-19 of-life based upon the then currently authorized rate of return, and (3) estimated future 20 decommissioning expenses. 21

In UE 345/Advice No. 18-02, the Commission issued Order No. 18-199, approving the accelerated depreciation associated with Idaho Power's exit from operations of Valmy Unit 1 by December 31, 2019. Due to cessation of Valmy Unit 1, Order No. 19-341 authorized the removal from customer rates of the accelerated depreciation associated with those investments effective January 1, 2020. Filed pursuant to Order No. 17-235 and ORS

- 1 757.259(2)(e), the AAC requires Idaho Power to file a deferral request. This deferral is
- 2 intended to provide for the deferral and tracking of decommissioning revenues collected and
- 3 decommissioning costs incurred until decommissioning activities are concluded. In addition,
- 4 this deferral will allow Idaho Power to appropriately match the costs borne by and benefits
- 5 received by customers.

6

8

16

# C. <u>Proposed Accounting</u>

7 Idaho Power records revenues and expenses that would be subject to the deferral

order in accordance with the Code of Federal Regulations to the Federal Energy Regulatory

Commission ("FERC") Accounts 440-444 (Operating Revenues), FERC Account 557 (Other

10 Expenses), and FERC Accounts 500-598 (Operations and Maintenance Accounts). Upon

11 receiving approval of a deferral, Idaho Power proposes to record the deferred amounts to

12 FERC Account 182 (Regulatory Assets) until decommissioning activities are concluded.

13 After decommissioning activities are concluded, amounts in the deferral account, either

positive or negative, will be recovered or refunded in customer rates through a surcharge or

15 credit, as appropriate.

#### D. Estimate of Amounts

17 Order No. 17-235 approved an Oregon jurisdictional revenue requirement increase of 18 \$1.06 million associated with the recovery of the annual incremental return on and accelerated depreciation of existing Valmy investments, and decommissioning costs related 19 to the Valmy shutdown. In addition, Order No. 18-199 approved an Oregon jurisdictional 20 revenue requirement increase of \$2.50 million associated with the recovery of the 21 22 accelerated depreciation of existing Valmy Unit 1 investments by year end 2019. The Oregon 23 jurisdictional revenue requirement decreased \$3.17 million with Order No. 19-341 as a result 24 of cessation of Valmy Unit 1 and full collection of the associated investments. Idaho Power estimates the deferral account will contain the Oregon jurisdictional share of 25 decommissioning costs, approximately \$1.87 million at December 31, 2025. Because

1	deferred amounts associated with decommissioning costs are dependent on factors that	
2	cannot be precisely forecasted, Idaho Power cannot provide a precise estimate of the total	
3	deferred amount.	
4	E. <u>Notice</u>	
5	A copy of the Notice of Application for Deferred Accounting of Certain Costs	
6	Associated with the North Valmy Power Plant and a list of persons served with the Notice	
7	are attached to the Application as Attachment A.	
8	III. OAR 860-027-0300(4) REQUIREMENTS	
9	A. <u>Entries in the Deferred Account to Date</u>	
10	Attached to the Application as Attachment B is a description and explanation of the	
11	entries specific to decommissioning expenses in this deferred account through March 31,	
12	2022.	
13	B. Reason for Continuation of Deferred Accounting	
14	As discussed in detail above, this deferral is intended to capture decommissioning	
15	revenues collected and decommissioning costs incurred in accordance with Order No. 17-	
16	235.	
17	IV. <u>CONCLUSION</u>	
18	Reauthorization of deferred accounting treatment is an appropriate, just, and	
19	reasonable means of implementing Order No. 17-235.	
20	For the reasons stated above, Idaho Power requests permission to defer	
21	decommissioning revenues collected and decommissioning costs incurred beginning June	
22	1, 2022, pursuant to Order No. 17-235.	
23		
24		
25		
26		

1	DATED: May 31, 2022	
2		IDAHO POWER COMPANY
3		Lin D. Madotrom
4		LISA D. NORDSTROM
5		Attorney for Idaho Power Company
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		

**Attachment A** 

# BEFORE THE PUBLIC UTILITY COMMISSION

1	OF OREGON		
2	UM 1853 (5)		
3	In the Matter of Idaho Power Company's Application for Deferred Accounting of Certain  NOTICE OF APPLICATION FOR		
5	Costs Associated with the North Valmy Power Plant  DEFERRED ACCOUNTING OF CERTAIN COSTS ASSOCIATED WITH THE NORTH VALMY POWER PLANT		
7	On May 31, 2022, Idaho Power Company ("Idaho Power") filed an application with		
8	the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the		
9	deferral of decommissioning revenues collected and decommissioning costs incurred		
10	pursuant to Order No. 17-235.		
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 who		
15	wish to obtain a copy or they may contact the following:		
16 17 18	Lisa D. Nordstrom Idaho Power Company 1221 West Idaho Street P.O. Box 70 Boise, ID 83707		
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 June 24, 2022.		
22	DATED: May 31, 2022.		
23	Lisa D. Modotrom		
24	Lisa D. Nordstrom Attorney for Idaho Power Company		
25	, morney for identify to only		
26			

**Attachment B** 

Year	Account	DATE DISTDESC	VALMY OR DECOMM ENTRIES	Sum TOTAMT
2017	182436 182436	7/31/2017 RECORD COMBINED REVENUE 8/31/2017 RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2017	182436	9/30/2017 RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2017 2017	182436 182436	10/31/2017 RECORD COMBINED REVENUE 11/30/2017 RECORD COMBINED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2017 2017 Total	182436	12/31/2017 RECORD COMBINED REVENUE	VALMY OR DECOMM	-6694.00 - <b>40164.00</b>
2018	182436	1/31/2018 RECORD COMBINED REVENUE	VALMY OR DECOMM	-6694.00
2018	182436 182436	2/28/2018 RECORD COMBINED REVENUE 3/31/2018 LEVELIZED REVENUE	VALMY OREGON DECOMM ENTRY VALMY OREGON DECOMM	-6694.00 -6694.00
2018	182436	4/30/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436 182436	5/31/2018 LEVELIZED REVENUE 6/30/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2018	182436	7/31/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018	182436 182436	8/31/2018 LEVELIZED REVENUE 9/30/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2018	182436	10/31/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2018 2018	182436 182436	11/30/2018 LEVELIZED REVENUE 12/31/2018 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2018 Total				-80328.00
2019	182436 182436	1/31/2019 LEVELIZED REVENUE 2/28/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2019	182436	3/31/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436 182436	4/30/2019 LEVELIZED REVENUE 5/31/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2019	182436	6/30/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436 182436	7/31/2019 LEVELIZED REVENUE 8/31/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00
2019	182436	9/30/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES  VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2019	182436	10/31/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2019	182436 182436	11/30/2019 LEVELIZED REVENUE 12/31/2019 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2019 Total				-80328.00
2020	182436 182436	1/31/2020 LEVELIZED REVENUE 2/29/2020 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM ENTRIES	-6694.00 -6694.00
2020	182436	3/31/2020 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES	-6694.00
2020	182436 182436	4/30/2020 LEVELIZED REVENUE 5/31/2020 LEVELIZED REVENUE	VALMY OR DECOMM ENTRIES VALMY OR DECOMM	-6694.00 -97336.12
2020	182436	5/31/2020 LEVELIZATION INTEREST	VALMY OR DECOMM	3463.01
2020	182436 182436	5/31/2020 REVENUE REQUIREMENT 6/30/2020 LEVELIZED REVENUE	VALMY OR DECOMM VALMY DECOMM	86324.92 -97336.12
2020	182436	6/30/2020 LEVELIZATION INTEREST	VALMY DECOMM	3421.15
2020	182436 182436	6/30/2020 REVENUE REQUIREMENT 7/31/2020 LEVELIZED REVENUE	VALMY DECOMM VALMY ID-OR DECOMM	86324.92 -97336.12
2020	182436	7/31/2020 LEVELIZATION INTEREST	VALMY ID-OR DECOMM	3379.05
2020	182436 182436	7/31/2020 REVENUE REQUIREMENT 8/31/2020 LEVELIZED REVENUE	VALMY ID-OR DECOMM VALMY DECOMM ID-OR	86324.92 -97336.12
2020	182436	8/31/2020 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	3336.72
2020	182436 182436	8/31/2020 REVENUE REQUIREMENT 9/30/2020 LEVELIZED REVENUE	VALMY DECOMM ID-OR Reversal-VALMY DECOMM ID-OR	86324.92 97336.12
2020	182436	9/30/2020 REVENUE REQUIREMENT	Reversal-VALMY DECOMM ID-OR	-86324.92
2020	182436 182436	9/30/2020 LEVELIZATION INTEREST	Reversal-VALMY DECOMM ID-OR	-3336.72
2020	182436	9/30/2020 LEVELIZED REVENUE 9/30/2020 LEVELIZATION INTEREST	CORRECT REV JRNL 34970 CORRECT REV JRNL 34970	-97336.12 3336.72
2020	182436	9/30/2020 REVENUE REQUIREMENT	CORRECT REV JRNL 34970	86324.92
2020	182436 182436	9/30/2020 LEVELIZED REVENUE 9/30/2020 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 3294.15
2020	182436	9/30/2020 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	86324.92
2020	182436 182436	10/31/2020 LEVELIZED REVENUE 10/31/2020 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 3251.35
2020	182436	10/31/2020 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	86324.92
2020	182436 182436	11/30/2020 LEVELIZED REVENUE 11/30/2020 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 3208.31
2020	182436	11/30/2020 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	86324.92
2020	182436 182436	12/31/2020 LEVELIZED REVENUE 12/31/2020 ROUNDING ADJ TO SCHED	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 0.01
2020	182436	12/31/2020 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	3165.03
2020 2020 Total	182436	12/31/2020 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	86324.92 -88346.82
2021	182436	1/31/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021	182436 182436	1/31/2021 LEVELIZATION INTEREST 1/31/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	3121.51 81933.51
2021	182436	2/28/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021	182436 182436	2/28/2021 LEVELIZATION INTEREST 2/28/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	3053.40 81933.51
2021	182436	3/31/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021	182436 182436	3/31/2021 LEVELIZATION INTEREST 3/31/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	2984.90 81933.51
2021	182436	4/30/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	81933.51
2021 2021	182436 182436	4/30/2021 LEVELIZED REVENUE 4/30/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 2916.03
2021	182436	5/31/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021 2021	182436 182436	5/31/2021 REVENUE REQUIREMENT 5/31/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	81933.51 2846.77
2021	182436	6/30/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021	182436 182436	6/30/2021 LEVELIZATION INTEREST 6/30/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	2777.13 81933.51
2021	182436	7/31/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2707.11
2021 2021	182436 182436	7/31/2021 LEVELIZED REVENUE 7/31/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 81933.51
2021	182436	8/31/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	81933.51
2021 2021	182436 182436	8/31/2021 LEVELIZED REVENUE 8/31/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 2636.69
2021	182436	9/30/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2565.89
2021 2021	182436 182436	9/30/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 81933.51
2021	182436	9/30/2021 REVENUE REQUIREMENT 10/31/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12
2021	182436	10/31/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2494.69
2021	182436 182436	10/31/2021 REVENUE REQUIREMENT 11/30/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	81933.51 2423.10
2021	182436	11/30/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021	182436 182436	11/30/2021 REVENUE REQUIREMENT 12/31/2021 LEVELIZATION INTEREST	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	81933.51 2351.11
2021	182436	12/31/2021 LEVELIZED REVENUE	VALMY DECOMM ID-OR	-97336.12
2021 2021 Total	182436	12/31/2021 REVENUE REQUIREMENT	VALMY DECOMM ID-OR	81933.51 -151952.99
2022	182436	1/31/2022 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2278.72
2022	182436 182436	1/31/2022 REVENUE REQUIREMENT 1/31/2022 LEVELIZED REVENUE	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	77544.18 -97336.12
2022	182436	2/28/2022 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2181.58
2022	182436 182436	2/28/2022 REVENUE REQUIREMENT 2/28/2022 LEVELIZED REVENUE	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	77544.18 -97336.12
2022	182436	3/31/2022 LEVELIZATION INTEREST	VALMY DECOMM ID-OR	2083.91
2022 2022	182436 182436	3/31/2022 LEVELIZED REVENUE 3/31/2022 REVENUE REQUIREMENT	VALMY DECOMM ID-OR VALMY DECOMM ID-OR	-97336.12 77544.18
2022 Total	102430	5.5 1/2022 NEVENUE NEGUIREMENT	WENT DECOMM ID-OX	-52831.61

2022 Total 3/3/1/2022 REVENUE REQUIREMENT VALMT DECUMM ID-OR //7644.15

C2022 Total 4-293951.42

493951.42

1	CERTIFICATE	OF SERVICE	
2	UM 1853(5)		
3	I hereby certify that on May 31, 2022, I served a true and correct copy of Idaho Powe		
4	Company's Notice of Application on the parties in Docket UE 233 and UE363 by e-mail		
5	said person(s) as indicated below.		
6	OPUC Dockets Citizens' Utility Board of Oregon	Robert Jenks Citizens' Utility Board of Oregon bob@oregoncub.org	
7	dockets@oregoncub.org		
8	Lisa F. Rackner McDowell Rackner & Gibson PC	Stephanie S. Andrus Department of Justice	
9	dockets@mrg-law.com	Business Activities Section Stephanie.andrus@doj.state.or.us	
10	Judy Johnson	Donald W Schoenbeck	
11	Public Utility Commission of Oregon Judy.johnson@puc.oregon.gov	Rgulatory & Cogeneration Services Inc. dws@r-c-s-inc.com	
12	Erick Colville Public Utilities Commission of Oregon	Gregory M. Adams  Richardson Adams, PLLC  greg@richardsonadams.com	
13	Erik.colville@puc.oregon.gov		
14	Peter J. Richardson Richardson Adams, PLLC	Joshua D. Johnson Attorney at Law	
15	peter@richardsonadams.com	idi@racinelaw.net	
16	Dr. Don Reading dreading@mindspring.com	Anthony J. Yankel Utility Net, Inc.	
17	<u>ureaumg@minuspring.com</u>	tony@yankel.net	
18	Randy Dahlgren Portland General Electric Company	John W. Stephens Esler Stephens & Buckley	
19	Pge.opuc.filings@pgn.com	stephens@eslerstephens.com ortez@eslerstephens.com	
20	Irion A. Congor		
21	Irion A. Sanger Davison Van Cleve, PC	Renewable Northwest Project dockets@renewablenew.org	
22	irion@sanger-law.com	Ivian A Ocumen	
23	Etta Lockey Pacific Power	Irion A Sanger Sanger Law PC	
24	Etta.lockey@pacificorp.com	<u>irion@sanger-law.com</u>	
25	Oregon Dockets PacifiCorp, d/b/a Pacific Power		
26	oregondockets@pacificorp.com		

1	DATED: May 31, 2022	0
2		Stacy Cust
3		Stacy Gust, Regulatory Administrative Assistant
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		Idaho Power Company