

DEPARTMENT OF JUSTICE GENERAL COUNSEL DIVISION

March 24, 2005

Public Utility Commission of Oregon Attn: Filing Center 550 Capitol Street, NE Suite 215 PO Box 2148 Salem, Oregon 97308-2148

Re: UE 167

Dear Filing Center:

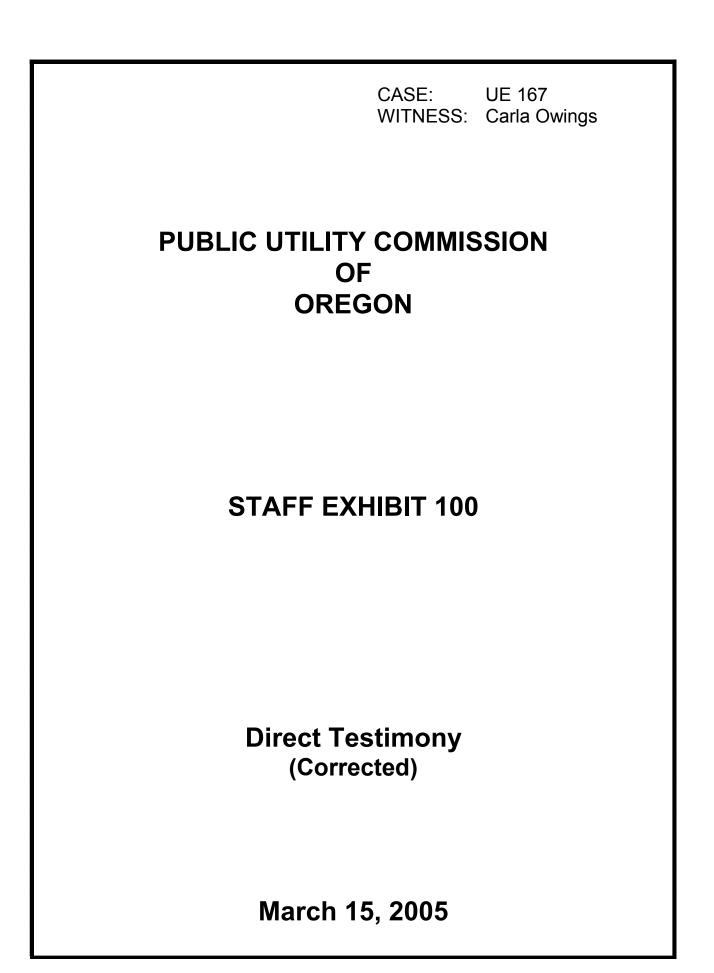
Enclosed for filing, please find a corrected page 3 of Staff Exhibit 100 (the testimony of Carla Owings) and a corrected Staff Exhibit 102 (Exhibits in Support of Direct Testimony). The correction to page 3 of Staff Exhibit 100 is found at lines 2 and 3. The corrections to Staff Exhibit 102 are throughout the exhibit. Staff asks that the Commission replace page 3 of Staff Exhibit 102 filed on March 15, 2005, with these corrected pages.

Thank you for your attention.

Very truly yours,

Stephanie S. Andrus Assistant Attorney General

Enc. c. Service List



Docket UE 167 - Corrected

to the test year data contained in Idaho Power's application. Column (4) shows the changes for Idaho Power's revenue requirements of a negative \$69 million, or a .27 percent (.27%) reduction in operating revenues from existing rates (See Staff/102, Owings/6, line 1, column 4, Required Change for Reasonable Return). Staff believes this reduction is required for the Company to achieve a reasonable rate of return. Page 7 contains the summary income tax calculations for the adjustments to the revenue requirements.

4. Page 8 shows the capital structure and revenue sensitive costs that have been used to calculate revenue requirement in this case.

Pages 9 and 10 show the adjustments. Page 9 shows each 5. adjustment with the revenue requirement effect of each adjustment on line 41. Page 10 shows the income tax calculation for each adjustment.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

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CASE: UE 167 WITNESS: Carla Owings **PUBLIC UTILITY COMMISSION** OF OREGON **STAFF EXHIBIT 102 Exhibits in Support of Direct Testimony** (Corrected)

March 15, 2005

IDAHO POWER UE 167 STAFF ADJUSTED RESULTS YEAR ENDING DECEMBER 2003

		SYSTEM PER APPLICATION	OREGON PER APPLICATION	PERCENT OREGON ALLOCATED	SYSTEM ADJUSTED RESULTS	OREGON ADJUSTED RESULTS	OREGON ADJ RESULTS 000
	DESCRIPTION						
1	Rate of Return Under Present Rates						
2	Total Combined Rate Base	1,693,060,930	81,791,447	4.831%	1,660,449,601	80,216,000	80,216
3	_						
4	Revenues	576 020 179	00.000.405	4.0400/	E7E 000 00E	20,220,200	20,220
5	Sales Revenues	576,039,178	28,336,125	4.919%	575,880,085	28,328,299	28,328
6	Other Operating Revenues	<u>42,189,259</u> 618,228,437	1,855,258 30,191,383	4.397% 4.884%	<u>113,567,333</u> 689,447,418	4,994,084 33.322.383	4,994 33.322
8	Total Operating Revenues	018,228,437	30, 191, 383	4.884%	089,447,418	33,322,383	33,322
9	Operating Expenses						
10	Operation & Maintenance Expenses	394,003,896	19,130,997	4.856%	385,086,300	18,698,000	18,698
11	Depreciation Expense	90,083,854	4,506,077	5.002%	89,863,946	4,495,077	4,495
12	Amortization Expense	9,886,473	488,509	4.941%	9,886,473	488,509	489
13	Taxes other than Income	21,746,762	1,494,994	6.875%	21,746,762	1,494,994	1,495
14	Provision for Deferred Income Taxes	2,799,569	104,840	3.745%	2,803,842	105,000	105
15	Investment Tax Credit Adjustment	(397,388)	(14,882)	3.745%	(400,539)	(15,000)	(15)
16	Federal Income Taxes	16,360,882	612,690	3.745%	48,086,986	1,800,784	1,801
17	State Income Taxes	2,260,272	84,644	3.745%	8,374,979	313,631	314
18	Total Operating Expenses	536,744,320	26,407,869	4.920%	565,448,748	27,380,995	27,381
19							
20	Operating Income						
21	Operating Income	81,484,118	3,783,514	4.643%	123,998,670	5,941,388	5,941
22	Add: IERCO Operating Income	6,921,602	341,811	4.938%	6,921,602	341,811	342
23	Consolidated Operating Income	88,405,720	4,125,325	4.666%	130,920,272	6,283,199	6,283
24	Rate of Return at present rates	5.22%	5.04%		7.88%	7.833%	7.83%
25							
26	Development of Revenue Requirement						
27	Rate of Return @ required 11.20 ROE	8.334%	8.334%		7.833%	7.833%	7.833%
28		1 1 1 000 000	0.040.400	4.0040/	100,000,000	0.044.400	0.044
29	Return at claimed rate of return	141,099,698	6,816,499	4.831%	130,069,609	6,241,199	6,241
30	Earnings Deficiency	52,693,978	2,691,174	5.107%	(850,662)	(42,000)	(42)
31	Nation Organ Multiplian	4.040	1.040		4.040	4.040	4.040
32	Net to Gross Multiplier	1.642	1.642	5.107%	1.648	1.648	1.648
33 34	Revenue Deficiency	86,523,512	4,418,908	5.107%	(1,402,232)	(69,233)	(69)
34 35	Firm Juristitional Revenues	515,869,558	25,220,299	4.889%	515,869,558	25.220.299	25,220
36	Percent Increase Required	16.77%	25,220,299	4.009%	-0.27%	-0.27%	20,220
30	r crocht morease riequired	10.77/0	17.52/0		-0.21/0	-0.27 /0	
38	Sales and Wheeling Required	602,393,070	29,639,207	4.920%	514,467,326	25,151,066	25,151

Item	Staff	Issue	Revenue Requirement Effect
		Revenue Requirement on the Company's Filed Results	\$4,419
		Proposed Staff Adjustments	
S-0	TM/BC	Rate of Return -ISSUE RESOLVED AS RESULT OF STIPULATION	(670)
S-00	со	Net to Gross Factor - ISSUE RESOLVED AS A RESULT OF STIPULATION	14
S-1	со	Known & Measurable Changes to Rate Base - ISSUE RESOLVED AS A RESULT OF STIPULATION	(00)
S-2	MG/BW	Net Power Supply Idaho Power uses the AURORA model to estimate competitive market electricity prices. The estimated prices are significantly lower than actual market electricity prices known at the time of the UE 167 filing. Staff recommends adjustments to surplus sales and purchased power based on using market electricity prices more representative of the period rates will be in effect.	(23)
S-3	со	Cloud Seeding Costs - ISSUE RESOLVED AS A RESULT OF STIPULATION	(52)
S-4	MD	Non-Labor A & G Expenses - ISSUE RESOLVED AS A RESULT OF STIPULATION	(187)

ltem	Staff	Issue	Revenue Requirement Effect
S-5	LK	Employee Incentive Pay - ISSUE RESOLVED AS A RESULT OF STIPULATION	
			(288)
S-6	LK	Payroll Salary Structure - ISSUE RESOLVED AS A RESULT OF STIPULATION	
			0
S-7	LK	Wage & Salary Adjustment - ISSUE RESOLVED AS A RESULT OF STIPULATION	(32)
S-8	со	Hells Canyon Complex Legal Costs - ISSUE RESOLVED AS A RESULT OF STIPULATION	
S-9	со	Rate Base Additions Annualized - ISSUE RESOLVED AS A RESULT OF STIPULATION	(4)
S-10	MD	Prepaid Pension Expense - ISSUE RESOLVED AS A RESULT OF STIPULATION	
			(93)
S*		Rounding	(4)
		TOTAL	(4,488)
		INDICATED REVENUE REQUIREMENT:	(\$69)

			Revenue Requirement
Item	Staff	Issue	Effect

		Other Issues	
		Julier Issues	
S-11	JF/JB	Marginal Cost Adjustment - ISSUE RESOLVED AS A RESULT OF STIPULATION	
		Adjust marginal costs as used in Idaho Power's marginal cost study. Reallocate uncollectible	
		expenses proportionate to a four-year average between the customer classes. Proposal to add a	
		\$20 Service Establishment Charge as described at Idaho Power/Exhibit 34T, Bowman/Pages 6-8 to be waived.	
S-12	MD	Audit Recommendations - ISSUES RESOLVED AS A RESULT OF STIPULTATION	
	1.	Pursuant to ORS 757.495 and OAR 860-027-0040, IPC should file an application for approval of the service agreement for those administrative services furnished to IPC by affiliates, and for	
		services provided by IPC to affiliates. IPC was requested to file within sixty days of the receipt of the Idaho Power Audit Report dated December 8, 2004. (Audit Recommendation)	
	2.	Pursuant to OAR 860-027-0041, IPC should file an informational filing concerning the	
		construction services provided to IDACOMM. (Audit Recommendation)	
	3.	Pursuant to ORS 757.495 and OAR 860-027-0040, IPC should file an application for approval	
		of the short-term borrowing from its affiliate, Idaho Energy Resources Co. (IERCO). (Audit Recommendation)	
	4.	IPC shall file pursuant to ORS 757.480 and OAR 860-027-0025, an application for	
		Commission approval of two property sales (Boise Bench Transmission Station Land Sale (2001), State Street Office Sale (2001)) and any other property sale that was of a value in excess of \$100,000. (Audit Recommendation).	
	5.	IPC should improve its accounting processes to properly classify lobbying expenses to non-utility accounts when the expenses are initially recorded on its books. (Audit Recommendation)	

Item	Staff Issu	Revenue Requirement Effect
	Staff Witnesses:	Phone Numbers
JB	Jack Breen	378-5942
вс	Bryan Conway	378-6200
MD	Michael Dougherty	378-3623
JF	Janet Fairchild	
MG	Maury Galbraith	378-6667
LK	Lynn Kittilson	378-6116
тм	Thomas Morgan	378-4629
со	Carla Owings	378-6629
BW	Bill Wordley	378-5264

IDAHO POWER UE 167 REVENUE REQUIREMENT MODEL TEST PERIOD ENDING DECEMBER 2003 (\$000)

<u> </u>		2022			5	D "
		2003			Required	Results
		Results Per			Change for	at
		Company		2003	Reasonable	Reasonable
		Filing	Adjustments	Adjusted	Return	Return
	SUMMARY SHEET	(1)	(2)	(3)	(4)	(5)
1	Operating Revenues	_				
2	Retail Sales	\$25,220	\$3,177	\$28,397	(\$69)	\$28,328
3	Wholesale Sales	3,116	0	3,116	0	3,116
4	Other Revenues	1,855	23	1,878	0	1,878
5	Total Operating Revenues	\$30,191	\$3,200	\$33,391	(\$69)	\$33,322
6	Operating Expenses	\$6,434	\$0	\$6,434	\$0	\$6,434
7	Steam Production	1,190	(49)	1,141	0	1,141
8	Hydro Production	3,599	68	3,667	0	3,667
9	Other Power Supply	883	0	883	0	883
10	Transmission	2.646	0	2,646	0	2,646
11	Distribution	838	0	838	0	838
12	Customer Accounting	233	0	233	0	233
13	Customer Service & Info	0	0	0	0	0
14	Sales	3,308	(452)	2,856	0	2,856
15	Administrative and General	\$19,131	(\$433)	\$18,698	\$0	\$18,698
16	Total Operation & Maintenance	\$4,506	(\$11)	\$4,495	\$0	\$4,495
17	Depreciation	489	0	489	0	489
18	Amortization	1,495	0	1,495	0	1,495
19	Taxes Other than Income	788	1,444	2,232	(27)	2,205
20	Income Taxes	(342)	0	(342)	(27)	(342)
20 21	Miscellaneous Revenue and Expense	\$26.066	\$1.000	\$27,066	(\$27)	\$27,039
22	Total Operating Expenses	\$4,125	\$2,200	\$6,325	(\$42)	\$6,283
23	Net Operating Revenues					
24	Average Rate Base					
25	Electric Plant in Service	\$157,928	(\$798)	\$157,130	\$0	\$157,130
26	Accumulated Depreciation & Amortization	(68,493)	44	(68,449)	0	(68,449)
27	Accumulated Deferred Income Taxes	(11,456)	0	(11,456)	0	(11,456)
28	Accumulated Deferred Inv. Tax Credit		0	0	0	0
29	Net Utility Plant	\$77,979	(\$754)	\$77,225	\$0	\$77,225
30	Plant Held for Future Use	0	0	0	0	0
31	Acquisition Adjustments	0	-	-	0	0
32	Working Capital	765	38	803	(1)	803
33	Fuel Stock	324	0	324	0	324
34	Materials & Supplies	1,020	0	1,020	0	1,020
35	Customer Advances for Construction	(53)	0	(53)	0	(53)
36	Weatherization Loans	· · ·	0	0	0	0
37	Prepayments	860	(860)	0	0	0
38	Misc. Deferred Debits	186	0	186	0	186
39	Misc. Rate Base Additions/(Deductions)	711	0	711	0	711
40	Total Average Rate Base	\$81,792	(\$1,576)	\$80,216	\$0	\$80,216
41	Rate of Return	5.04%		7.88%		7.83%
41 42		3.93%		10.11%		10.00%
42	Implied Return on Equity	১. ৬১%		10.11%	l	10.00%

IDAHO POWER UE 167 OREGON ALLOCATED RESULTS OF OPERATION TEST PERIOD ENDING DECEMBER 2003 (\$000)

	Income Tax Calculations	2003 Per Company Filing (1)	Adjustments (2)	2003 Adjusted (3)	Required Change for Reasonable Return (4)	Results at Reasonable Return (5)
1	Book Revenues +IERCO Income	\$30,514	\$3,200	\$33,714	(\$69)	\$33,645
2	Book Expenses Other than Depreciation	20,626	(433)	20,193	0	20,193
3	State Tax Depreciation	5,008	(11)	4,997	0	4,997
4	Interest	2,960	(51)	2,909	0	2,909
5 Less:	Schedule M Differences	(46)	0	(46)	<u>0</u>	(46)
6	State Taxable Income	\$1,966	\$3,695	\$5,661	(\$69)	\$5,592
7	State Income Tax	\$85	\$233	\$318	(\$4)	\$314
8	State Tax Credits	0	0	0	0	0
9	Net State Income Tax	\$85	\$233	\$318	(\$4)	\$314
10 11 Plus: 12	IERCO INCOME Adjustment Other Schedule M Differences Federal Taxable Income	\$323 64	\$0 	\$323 64_ \$5,041	\$0 	\$323 <u>64</u> \$4,976
13	Federal Tax @ 35%	\$553	\$1,211	\$1,764	(\$23)	\$1,741
14	Federal Tax Credits	0	0	0	0	0
15	Current Federal Tax	\$553	\$1,211	\$1,764	(\$23)	\$1,741
16	ITC Adjustment	\$0	\$0	\$0	\$0	\$0
17	Prior Year Defficiency	60	0	60	0	60
18	Restoration	15	0	15	0	15
19	Total ITC Adjustment	\$45	\$0	\$45	\$0	\$45
20	Provision for Deferred Taxes	\$105	\$0	\$105	\$0	\$105
21	Total Income Tax	\$787	\$1,444	\$2,231	(\$27)	\$2,204

IDAHO POWER UE 167 OREGON ALLOCATED RESULTS OF OPERATIONS TEST PERIOD ENDING DECEMBER 2003 (\$000)

REVENUE SENSITIVE COSTS	
Revenues	1.00000
Operating Revenue Deductions Uncollectible Accounts Taxes Other - Franchise - Other - Resource supplier State Taxable Income	0.00000 0.00394 0.00000 0.00000 0.99606
State Income Tax	0.06275
Federal Taxable Income	0.93331
Federal Income Tax @ 35% ITC Current FIT	0.32666 0.00000 0.32666
Other	0.00000
Total Excise Taxes	0.38941
Total Revenue Sensitive Costs	0.39335
Utility Operating Income	0.60665
Net-to-Gross Factor	1.648

COST OF CAPITAL - STAFF	% of CAPITAL	COST	WEIGHTED COST
Long Term Debt	54.03%	5.99%	3.24%
Preferred Stock	0.00%	0.00%	0.00%
Common Equity	45.97%	10.00%	4.60%
Total	100.00%		7.83%

IDAHO POWER UE 167 STAFF ADJUSTMENTS TO OREGON ALLOCATED RESULTS TEST PERIOD ENDING DECEMBER 2003

(\$000)

		Rate Base Adjust to	Net Power	Cloud Seeding	Non-labor A & G	Employee Incentive Pay	3% Payroll Salary increase	Wage & Salary	Hells Canyon Legal	Annualized Rate Base	Prepaid Pension	Total Adjustments
	Staff Adjustments	K & M changes (S-1)	Supply adj. (S-2)	Costs (S-3)	Expenses (S-4)	K & M (S-5)	K & M (S-6)	Adjustment (S-7)	Costs (S-8)	Additions (S-9)	Expense (S-10)	(Base Rates)
		(3-1)	(3-2)	(3-3)	(3-4)	(3-5)	(3-0)	(3-7)	(3-0)	(3-9)	(3-10)	-
1	Operating Revenues	0	0.477	0	0	0	0	0	0	0	0	0.177
2	Retail Sales	0	3,177	0	0		0	0	0		0	3,177
3	Wholesale Sales Other Revenues	0 23	0	0	0	0	0	0	0	0	0	0 23
4	Total Operating Revenues	\$23	\$3,177	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$3,200
Ŭ		\$20	<i>v</i> o ,111	ψu	ţ.	ψŪ	ψŪ	ţ.	ψŪ	ψŪ	ţt	\$0,200
6	Operating Expenses											
7	Steam Production	0	0	0	0	0	0	0	0	0	0	0
8	Hydro Production	0	0	(49)	0	0	0	0	0	0	0	(49)
9	Other Power Supply	0	68	0	0	0	0	0	0	0	0	68
10	Transmission	0	0	0	0	0	0	0	0	0	0	0
11	Distribution	0	0	0	0	0	0	0	0	0	0	0
12	Customer Accounting	0	0	0	0	0	0	0	0	0	0	0
13	Customer Service & Info	0	0	0	0	0	0	0	0	0	0	0
14	Sales	0	0	0	0	0	0	0	0	0	0	0
15	Administrative and General	0	0	0	(186)	(234)	0	(32)	0	0	0	(452)
16	Total Operation & Maintenance	\$0	\$68	(\$49)	(\$186)	(\$234)	\$0	(\$32)	\$0	\$0	\$0	(\$433)
47		0	0	0	0	(14)	0	0	0	0	0	(14)
17 18	Depreciation Amortization	0	0	0	0	(11) 0	0	0	0	0	0	(11) 0
19	Taxes Other than Income	0	0	0	0	0	0	0	0	0	0	0
20	Income Taxes	9	1,215	19	73	100	0	13	0	4	11	1,443
21	Miscellaneous Revenue and Expense	0	0	0	0	0	0	0	0	0	0	0
22	Total Operating Expenses	9	1,283	(30)	(113)	(145)	0	(19)	0	4	11	999
23	Net Operating Revenues	\$14	\$1,894	\$30	\$113	\$145	\$0	\$19	\$0	(\$4)	(\$11)	\$2,200
24	Average Rate Base					••••				(* ')	(***)	
24	Electric Plant in Service	0	0	(25)	0	(374)		(5)	(29)	(365)	0	(798)
26	Accumulated Depreciation & Amortization	0	0	(23)	0	(014)	0	(3)	(23)	(000)	ů O	44
27	Accumulated Deferred Income Taxes	0	0	0	0	0	0	0	0	0	0	0
28 29	Accumulated Deferred Inv. Tax Credit Net Utility Plant	0 \$0	0	0 (\$25)	0 \$0	0 (\$374)	0 \$0	0 (\$5)	0 (\$29)	0 (\$321)	0 \$0	0 (\$754)
30	Plant Held for Future Use	0	0	0	0	0	0	0	0	0	0	0
31	Acquisition Adjustments	0	0	0	0	0	0	0	0	0	0	0
32	Working Capital	0	51	(1)	(5)	(6)	0	(1)	0	0	0	38
33	Fuel Stock	0	0	0	0	0	0	0	0	0	0	0
34	Materials & Supplies	0	0	0	0	0	0	0	0	0	0	0
35	Customer Advances for Construction	0	0	0	0	0	0	0	0	0	0	0
36	Weatherization Loans	0	0	0	0	0	0	0	0	0	0	0
37	Prepayments	0	0	0	0	0	0	0	0	0	(860)	(860)
38	Misc. Deferred Debits	0	0	0	0	0	0	0	0	0	0	0
39	Misc. Rate Base Additions/(Deductions)	0	0	0	0	0	0	0	0	0	0	0
40	Total Average Rate Base	\$0	\$51	(\$26)	(\$5)	(\$380)	\$0	(\$6)	(\$29)	(\$321)	(\$860)	(\$1,576)
41	Revenue Requirement Effect	(\$23)	(\$3,115)	(\$52)	(\$187)	(\$288)	\$0	(\$32)	(\$4)	(\$34)	(\$93)	(\$3,828)

	Income Tax Calculations	Rate Base Adjust to K & M changes (S-1)	0 Net Power Supply adj. (S-2)	Cloud Seeding Costs (S-3)	Non-labor A & G Expenses (S-4)	Employee Incentive Pay K & M (S-5)	3% Payroll Salary increase K & M (S-6)	Wage & Salary Adjustment (S-7)	Hells Canyon Legal Costs (S-8)	Annualized Rate Base Additions (S-9)	Prepaid Pension Expense (S-10)	Total Adjustments (Base Rates) 0
4	Dark Druggurg	\$23	\$3,177	\$0	\$0	¢0.	¢0.	\$0	\$0	\$0	\$0	¢2,200
	Book Revenues					\$0	\$0					\$3,200
2	Book Expenses Other than Depreciation	0	68	(49)	(186)	(234)	0	(32)	0	0	0	(\$433)
3	State Tax Depreciation	0	0	0	0	(11)	0	0	0	0	0	(\$11)
4	Interest	0	1	(1)	(0)	(11)	0	(0)	(1)	(9)	(25)	(\$51)
5	Schedule M Differences		0	0	0	0	0	0	0	0	0	\$0
6	State Taxable Income	\$23	\$3,108	\$50	\$186	\$256	\$0	\$32	\$1	\$9	\$28	\$3,695
7	State Income Tax	\$1	\$196	\$3	\$12	\$16	\$0	\$2	\$0	\$1	\$2	\$233
8	State Tax Credits	0	0	0	0	0	0	0	0	0	0	\$0
9	Net State Income Tax	\$1	\$196	\$3	\$12	\$16	\$0	\$2	\$0	\$1	\$2	\$233
10	Additional Tax Depreciation	0	0	0	0	0	0	0	0	0	0	\$0
11	Other Schedule M Differences	0	0	0	0	0	0	0	0	0	0	\$0
12	Federal Taxable Income	\$22	\$2,912	\$47	\$174	\$240	\$0	\$30	\$1	\$8	\$26	\$3,462
13	Federal Tax @ 35%	8	1,019	16	61	84	0	11	0	3	9	\$1,211
14	Federal Tax Credits	0	0	0	0	0	0	0	0	0	0	\$0
15	Current Federal Tax	\$8	\$1,019	\$16	\$61	\$84	\$0	\$11	\$0	\$3	\$9	\$1,211
16	ITC Adjustment											\$0
17	Deferral	0	0	0	0	0	0	0	0	0	0	\$0
18	Restoration	0	0	0	0	0	0	0	0	0	0	\$0
19	Total ITC Adjustment	0	0	0	0	0	0	0	0	0	0	\$0
												\$0
20	Provision for Deferred Taxes	0	0	0	0	0	0	0	0	0	0	\$0 \$0
21	Total Income Tax	\$9	\$1,215	\$19	\$73	\$100	\$0	\$13	\$0	\$4	\$11	\$1,444

UE 167 Service List (Parties)

RATES & REGULATORY AFFAIRS	STEPHANIE S ANDRUS
PORTLAND GENERAL ELECTRIC	DEPARTMENT OF JUSTICE
RATES & REGULATORY AFFAIRS	REGULATED UTILITY & BUSINESS SECTION
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CERTIFICATE OF SERVICE

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certify that I have this day served the foregoing document upon all parties of record in this proceeding by delivering a copy in person or by mailing a copy properly addressed with first class postage prepaid, or by electronic mail pursuant to OAR 860-13-0070, to all parties or attorneys of parties.

Dated at Salem, Oregon, this 29th day of March, 2005.

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