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VIA E-MAIL TO

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301-3398

Re: Docket UE 425 - In the Matter of Idaho Power Company, 2024 Annual Power Cost Update.

Attached for filing in the above-referenced docket is Idaho Power Company's 2024 March Forecast, which includes the Direct Testimony of Jessica G. Brady (Idaho Power/300-309).

Please contact this office with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Cole Albee".

Cole Albee
Paralegal
McDowell Rackner Gibson PC

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 425

IN THE MATTER OF IDAHO POWER)
COMPANY'S 2024 ANNUAL POWER)
COST UPDATE)
MARCH FORECAST)
_____)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

JESSICA G. BRADY

March 25, 2024

1 **Q. Are you the same Jessica G. Brady who previously submitted testimony in this**
2 **proceeding?**

3 A. Yes. I previously submitted direct testimony in this proceeding regarding the October
4 Update for the 2024 Annual Power Cost Update (“APCU”). The 2024 October Update
5 is Idaho Power Company’s (“Idaho Power” or “Company”) estimate of what
6 “normalized” power supply expenses will be for the upcoming APCU test period of
7 April 2024 through March 2025.

8 **Q. What is the status of the October Update in this proceeding?**

9 A. The Company filed the 2024 October Update on October 31, 2023, and the Public
10 Utility Commission of Oregon (“Commission”) Staff (“Staff”) and the Oregon Citizens’
11 Utility Board (“CUB”) reviewed the filing. Nine rounds of discovery requests have been
12 served on the Company since the initial filing. Settlement conferences were held
13 between Idaho Power, Staff, and CUB on January 4 and January 10, 2024. On
14 January 31, Staff filed opening testimony and on February 29, the Company filed reply
15 testimony.

16 **Q. What is the purpose of your testimony?**

17 A. The purpose of my testimony is to describe the second part of the Company’s APCU
18 filing, which is the March Forecast, as detailed in Order No. 08-238.¹ As mentioned
19 previously, the Company filed the first part of the APCU, the October Update, on
20 October 31, 2023. The initial October Update filing proposed a revenue decrease of
21 \$101,556, or a 0.18 percent decrease. If the March Forecast and October Update are
22 approved as filed, the 2024 composite APCU (both the October Update and March
23 Forecast components) will result in a revenue decrease of \$6.1 million or a 9.2 percent
24 decrease in billed revenue collection, to become effective June 1, 2024.

25 _____
26 ¹ *In the Matter of Idaho Power Company’s Application for Authority to Implement a Power Cost Adjustment Mechanism*, Docket No. UE 195, Order No. 08-238 (Apr. 28, 2008).

1 **Q. What are the main factors driving the revenue change requested in this case?**

2 A. The revenue decrease requested in this case results from a decrease in expected net
3 power supply expense ("NPSE") for the March Forecast, as well as a decrease in
4 normalized NPSE for the October Update, which has been updated since the initial
5 October Update filing.

6 The requested revenue requirement for the 2024 March Forecast is
7 approximately \$4.9 million, which reflects a \$6.0 million decrease compared to the
8 current 2023 March Forecast revenue requirement included in Oregon customer rates
9 of \$10.9 million. As discussed later in my testimony, the decrease in NPSE for the
10 2024 March Forecast as compared to last year is largely attributed to an increase in
11 hydro generation and a decrease in forward market electric prices.

12 For the October Update, the requested revenue requirement decrease is
13 approximately \$41,206 as compared to the revenue requirement decrease of
14 \$101,556 included in the initial October Update filing. The factors driving the revenue
15 requirement change are updated Energy Imbalance Market ("EIM") benefits and an
16 updated sales and load forecast.

17 **Q. How is your testimony organized?**

18 A. My testimony begins by describing the filing requirements associated with the March
19 Forecast and the differences between the October Update and the March Forecast.
20 Next, my testimony describes the required updates to AURORA. I then present and
21 discuss the forecast of total NPSE for the 2024 March Forecast and how it compares
22 to last year's 2023 March Forecast. My testimony concludes with the quantification of
23 the projected revenue requirement decrease and the proposed rate implementation to
24 allocate the revenue decrease to customers.

25 **Q. Have you prepared exhibits for this proceeding?**

26 A. Yes, I am sponsoring the following exhibits:

- 1 1. Exhibit 301, Total normalized base net power supply expense for the
- 2 2024 October Update
- 3 3. Exhibit 302, AURORA modeled determination of expected power
- 4 supply expense for the 2024 March Forecast
- 5 2. Exhibit 303, Forward price curves used for re-pricing purchased power
- 6 and surplus sales
- 7 3. Exhibit 304, Total expected net power supply expense for the 2024
- 8 March Forecast
- 9 4. Exhibit 305, Year-over-year differences in March Forecast net power
- 10 supply expense
- 11 5. Exhibit 306, EIM benefits
- 12 6. Exhibit 307, EIM costs
- 13 7. Exhibit 308, October Update and March Forecast combined rate
- 14 calculation
- 15 8. Exhibit 309, Revenue spread and revenue impact

16 I. MARCH FORECAST OVERVIEW

17 **Q. What is the March Forecast?**

18 A. The March Forecast is the Company's quantification of the "expected" NPSE for the
19 APCU test period of April through March, as determined by the AURORA model.

20 **Q. How does the March Forecast differ from the October Update?**

21 A. The October Update was calculated by simulating 37 water year conditions in the
22 AURORA model and then averaging the results of all 37 NPSE scenarios to create an
23 "average" or "normal" expectation of NPSE. In contrast, the March Forecast is
24 calculated by simulating the "expected" water condition during the upcoming APCU
25 test period using data derived from the Company's most recent long-term streamflow
26 forecast. The results for the October Update are used to update base rates, while the

1 results for the March Forecast are used to update Schedule 55, Annual Power Cost
2 Update.

3 **II. AURORA MODEL INPUTS**

4 **Q. Please describe the variables that are to be updated in the AURORA model for**
5 **the March Forecast, as described in Order No. 08-238.**

6 A. The following variables, as described in Order No. 08-238, are to be updated in the
7 March Forecast:

- 8 a. Fuel prices and transportation costs;
- 9 b. Wheeling expenses;
- 10 c. Planned outages and equivalent forced outage rates (“EFOR”);
- 11 d. Heat rates;
- 12 e. Forecast of normalized sales and loads, updated only for known
13 significant changes since the October APCU filing;
- 14 f. Forecast hydro generation from current reservoir levels and the most
15 recent water supply forecast;
- 16 g. Contracts for wholesale power and power purchases and sales;
- 17 h. Forward price curve;
- 18 i. Public Utility Regulatory Policies Act (“PURPA”) contract expenses;
19 and
- 20 j. The Oregon state allocation factor.

21 **Q. How do the modeling variables, as described in Order No. 08-238, compare**
22 **between the 2024 March Forecast and those used to develop the 2024 October**
23 **Update?**

24 A. All of the modeling variables described in Order No. 08-238 were reviewed for
25 accuracy, and updated where appropriate, in the preparation of the proposed March
26 Forecast. For the April 2024 through March 2025 test period, the following variables

1 changed since the October APCU was prepared: (1) fuel prices and transportation
2 costs; (2) forced outage rates; (3) heat rates; (4) forecast of normalized sales and load;
3 (5) forecast of hydro generation from stream flow conditions using the most recent
4 water supply forecast and current reservoir levels; (6) known power purchases and
5 surplus sales made in compliance with the Company's Energy Risk Management
6 Policy ("ERMP"); (7) forward price curve; and (8) PURPA contract expenses.

7 **A. Fuel Expense.**

8 **Q. What fuel cost forecasts were used for the October Update and March Forecast,**
9 **respectively?**

10 A. When the October Update was prepared, information from September 2023 was used.
11 The March Forecast determination of NPSE includes the Company's most current coal
12 and gas price forecasts from early March 2024.

13 **Q. How do coal fuel expense and coal-fired generation for the March Forecast**
14 **compare to the October Update results?**

15 A. Total coal fuel expense included in the 2024 March Forecast is \$62.9 million,
16 compared to \$84.6 million in the 2024 October Update, a decrease of 26 percent.
17 Coal-fired generation also decreased as compared to the October Update, from 2.1
18 million megawatt-hours ("MWh") to 1.6 million MWh, or approximately 24 percent.
19 Forecast generation at Bridger decreased 22 percent from the October Update and
20 forecast generation at Valmy decreased 33 percent.

21 **Q. What factors are driving the forecast coal-fired generation and expenses at**
22 **Bridger and Valmy?**

23 A. Forecast coal-fired generation decreased 24 percent compared to last year due to the
24 conversion of Bridger units 1 and 2 to natural gas. Both units are scheduled to be
25 converted to natural gas by spring 2024, and as a result, were modeled as natural gas
26 resources for this test year beginning in April and May, respectively.

1 **Q. Did the Company update its forecast of total OHAG expenses per the terms of**
2 **the 2016 and 2017 APCU settlement stipulations?**

3 A. Yes. Per the terms of the 2016 APCU settlement stipulation,² for the March Forecast,
4 the Company included within the AURORA model the per-MWh OHAG expense driven
5 by Idaho Power's dispatch of each coal plant. The Company separately accounted for
6 its fixed proportional share of the total OHAG expense incurred at each of the coal
7 plants.

8 Per the terms of the 2017 APCU settlement stipulation ("2017 Stipulation"),³
9 the Company is to annually update its fixed proportional share of total forecast OHAG
10 expense incurred at each of the coal plants as part of the March Forecast filing.
11 According to the stipulation, the OHAG forecast should be calculated with a three-year
12 historical average of actual OHAG costs, with a growth (reduction) rate equal to the
13 five-year historical average growth (reduction) rate.

14 For the 2024 March Forecast, Idaho Power updated the OHAG forecast using
15 the 2021-2023 historical average of actual OHAG costs, with a growth rate equal to
16 the 2022-2023 historical average growth rate. The Company excluded the growth
17 rates prior to 2022 due to the change in OHAG beginning in 2021. Starting in 2021,
18 OHAG moved from a positive number to a negative number, which is the result of an
19 increase in revenue from fly ash sales. The forecast of total OHAG expense for Bridger
20 and Valmy are displayed on lines 6 and 12 of Exhibit 302, respectively.

21 **Q. Does Idaho Power's 2024 March Forecast account for revenues received from**
22 **or expenses paid to NV Energy (its ownership partner in the Valmy plant) for use**
23

24 _____
25 ² *In the Matter of Idaho Power Company's 2016 Annual Power Cost Update*, Docket No. UE 301,
26 Stipulation at 7 (May 11, 2016).

³ *In the Matter of Idaho Power Company's 2017 Annual Power Cost Update*, Docket No. UE 314,
Stipulation at 7 (Apr. 28, 2017).

1 **of the Company's unused capacity or the Company's use of NV Energy's unused**
2 **capacity in Unit 2?**

3 A. Yes. Per the terms of the 2017 Stipulation, Idaho Power agreed to include the three-
4 year historical average of actual net balances associated with ownership partner use
5 of unused capacity at Valmy Unit 2 as an offset or expense to total NPSE. The
6 Company is to update the three-year historical average as part of the March Forecast.
7 For this year's March Forecast, the Company utilized the three-year average from
8 2020 – 2022, as the Company is still working with NV Energy to determine the usage
9 charge for 2023. The 2020-2022 historical average net revenue paid to Idaho Power
10 is \$71,106 on a system-wide basis, associated with NV Energy's dispatch of Idaho
11 Power's unused capacity at Valmy Unit 2. As shown on line 13 of Exhibit 302, this
12 amount has been reflected as an offset to NPSE for Valmy for the 2024 March
13 Forecast.

14 **Q. How did the gas price forecast included in the March Forecast change as**
15 **compared to the gas price forecast included in the October Update?**

16 A. The gas price forecast used for the March Forecast for Henry Hub was \$3.02 per
17 MMBtu, which is \$0.88 lower than the Henry Hub gas price used for the October
18 Update.

19 **Q. How does the Henry Hub price included in this year's March Forecast compare**
20 **to the price included in last year's March Forecast?**

21 A. The Henry Hub price of \$3.02 per MMBtu included in this year's March Forecast is
22 \$1.00 per MMBtu lower than the Henry Hub price used in last year's March Forecast,
23 reflecting a 25 percent decrease.

24 **Q. How is the Henry Hub gas price forecast used as an AURORA input?**

25 A. The Company uses the gas price forecast for Henry Hub as the starting point in the
26 AURORA model. Henry Hub is considered a reference fuel in AURORA, meaning

1 other gas market prices are determined by applying an adjustment factor to the Henry
2 Hub price. For example, a Henry Hub gas price of \$3.85 per MMBtu applied to a
3 Sumas basis of \$0.19 per MMBtu equals a Sumas gas price of \$4.04 per MMBtu
4 (\$3.85 + \$0.19 = \$4.04). The Company develops a separate gas price for its natural
5 gas units based upon the Henry Hub gas price forecast, referred to as the Idaho
6 Citygate price and the Bridger Gas price.

7 **Q. Please explain the Idaho Citygate price and the Bridger Gas price.**

8 A. The Idaho Citygate price is representative of the gas price delivered to Langley Gulch,
9 Danskin, and Bennett Mountain. It is based on the Henry Hub price and applies
10 adjustments for Sumas basis and transport costs.

11 The Bridger Gas price is representative of the gas price delivered to Bridger
12 units 1 and 2. It is based on the Henry Hub price and applies adjustments for Rockies
13 basis and transport costs.

14 **Q. How does the Idaho Citygate price for the 2024 March Forecast compare to last
15 year?**

16 A. The Idaho City Gate price price of \$4.64 per MMBtu included in this year's March
17 Forecast is \$1.25 per MMBtu lower than the Idaho Citygate price used in last year's
18 March Forecast, reflecting a 21 percent decrease.

19 **Q. What factors are driving the decrease in the Idaho Citygate price?**

20 A. The decrease in the Idaho Citygate price for the 2024 March Forecast is primarily due
21 to a decrease in the Henry Hub price, which is attributable to increased natural gas
22 production and above-average storage inventories, as well as relatively mild-winter
23 temperatures in 2023 and 2024. According to the U.S. Energy Information
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1 Administration (“EIA”), this year’s winter heating season ended with natural gas
2 inventories 37 percent higher than the 5-year average.⁴

3 **Q. What is the Bridger Gas price used in this year’s March Forecast?**

4 A. The Bridger Gas price for the 2024 March Forecast is \$3.80 per MMBtu.

5 ***B. PURPA Expense.***

6 **Q. Please describe any changes to PURPA generation and expense since the**
7 **October Update.**

8 A. The October Update included 354.7 average megawatts (“aMW”) of available PURPA
9 generation, whereas PURPA generation included in the March Forecast is 335.1
10 aMW, a decrease of 19.6 aMW, or 5.5 percent. Total PURPA expense included in the
11 March Forecast is \$242.9 million compared to \$250.3 million included in the October
12 Update, a decrease of \$7.5 million, or 3 percent. The decrease is largely due to the
13 removal of two solar projects (Moore’s Hollow and Prairie City) from the forecast, as
14 the developers missed their online dates and the agreements for these projects have
15 been terminated.

16 **Q. How does total PURPA generation and expense included in the 2024 March**
17 **Forecast compare to last year’s March Forecast?**

18 A. As mentioned above, this year’s March Forecast includes PURPA generation of 335.1
19 aMW and PURPA expense of \$242.9 million. Last year’s filed forecast included
20 PURPA generation of 342.2 aMW and PURPA expense of \$240.1 million. Compared
21 to last year’s settled PURPA expense amount, this year’s PURPA forecast is an
22 increase of \$9.8 million.

23 **Q. Have there been any changes in the number of PURPA projects since last year?**

24 A. No. There have been no changes in the number of PURPA projects since last year.
25

26 ⁴ EIA Short-Term Energy Outlook (“STEO”). March 2024.

1 **Q. Does the PURPA forecast included in the 2024 March Forecast include a**
2 **Contract Delay Rate (“CDR”) adjustment per the terms of the 2018 and 2020**
3 **APCU settlement stipulations?**

4 A. Yes. Durkee Solar is the only project expected to come online during the test year.
5 This project’s revised scheduled operation date with the CDR adjustment is July 17,
6 2025. As a result, this project was removed from this year’s forecast.

7 **C. Normalized Load.**

8 **Q. Please explain the change between the forecast of normalized load used in the**
9 **October Update and the March Forecast.**

10 A. The forecast of system normalized load used for the March Forecast is 1,962 aMW
11 compared to 1,971 aMW for the October Update, a decrease of 9 aMW. Additionally,
12 there was a reallocation of normalized load and billed sales by jurisdiction between
13 the October Update and March Forecast.

14 **D. Hydro Forecast.**

15 **Q. What is the basis of the hydro generation forecast for the March Forecast?**

16 A. The forecast of monthly hydro generation levels included in the 2024 March Forecast
17 is based on the Company’s long-term stream forecast from February 20, 2024. The
18 forecast has expected inflows into Brownlee Reservoir for April through July of 4.6
19 million acre-feet (“MAF”).

20 **Q. How does this year’s water supply forecast compare to last year’s forecast?**

21 A. The forecast used in last year’s March Forecast included expected inflows into
22 Brownlee Reservoir for April through July of 4.0 MAF compared to this year’s forecast
23 of 4.6 MAF, reflecting a 15 percent increase. Expected inflows into Brownlee Reservoir
24 were higher in this year’s March Forecast as a result of above normal storage
25 conditions in reservoirs upstream of Idaho Power’s hydro system coupled with normal
26

1 snowpack conditions, which provide for sustained runoff and increased hydro
2 generation during the spring and summer months.

3 **Q. How does the change in expected inflows impact this year's hydro generation**
4 **forecast compared to last year's forecast?**

5 A. The hydro generation forecasted for this year's March Forecast is 6.9 million MWh
6 compared to 6.4 million MWh in last year's March Forecast, a 9 percent increase.

7 **Q. How does the hydro generation forecast compare to the normalized scenario**
8 **used for the October Update?**

9 A. The hydro generation forecasted under the normalized scenario (37 water years) for
10 the 2024 October Update was 8.2 million MWh. The hydro generation forecasted for
11 this year's March Forecast is 6.9 million MWh, a decrease of 1.3 million MWh or 16
12 percent as compared to the October Update, which suggests that the expected hydro
13 generation for the 2024 March Forecast is below normal.

14 **E. Known Power Purchases and Surplus Sales.**

15 **Q. Did the Company include known power purchases and surplus sales resulting**
16 **from the Company's ERMP in the March Forecast?**

17 A. Yes. As directed by Order No. 08-238, the Company includes known power purchases
18 and surplus sales resulting from the Company's ERMP and incorporates those
19 amounts as net hedges as can be seen on lines 46 and 47 of Exhibit 302. Known
20 power purchases and surplus sales are not included in the October Update of the
21 APCU.

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1 **F. Re-Pricing Based on a Forward Price Curve.**

2 **Q. How are market power purchases and sales calculated for the March Forecast**
3 **portion of the APCU?**

4 A. Per Order No. 21-165, the wholesale electric prices for purchased power and surplus
5 sales determined by the AURORA model are replaced with an average forward electric
6 price curve.⁵

7 **Q. Please describe the re-pricing methodology mentioned above.**

8 A. The Company is required to re-price the AURORA-generated volumes of purchased
9 power and surplus sales with a forward-based price curve using the Mid-Columbia
10 ("Mid-C") hub. This methodology prescribes the use of the most recent monthly
11 forward price curve for the April through March test period.

12 **Q. Did Idaho Power apply this pricing methodology to the March Forecast?**

13 A. Yes. Exhibit 303 shows the March 13, 2024, Mid-C HL and LL forward price curve for
14 the April 2024 through March 2025 test period that the Company used to re-price
15 purchased power and surplus sales for the 2024 March Forecast.

16 **Q. Are there additional steps in the re-pricing of AURORA generated power**
17 **purchases and surplus sales for the March Forecast?**

18 A. Yes. To determine the portions of power purchases and sales that occur in HL and
19 LL hours (to which the forward price curve is applied), the Company extracts hourly
20 purchases and sales determined by the AURORA model. The portions of AURORA-
21 generated HL and LL purchases and sales for the 2024 March Forecast are shown on
22 lines 54, 56, 58, and 60 of Exhibit 304.

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26 ⁵ *In the Matter of Idaho Power Company's Application for Authority to Implement a Power Cost Adjustment Mechanism, Docket No. UE 384, Order No. 21-165 (May. 27, 2021).*

1 **Q. How does the re-pricing of purchased power and surplus sales, using a forward**
2 **price curve, change purchased power expenses and surplus sales revenues as**
3 **modeled by AURORA?**

4 A. The monthly Mid-C HL and LL forward price curve, from Exhibit 303, is applied to the
5 AURORA-generated proportions of HL and LL purchases and sales to determine re-
6 priced purchased power expense and surplus sales revenue for the March Forecast,
7 which can be seen on lines 24 and 42 of Exhibit 304. As shown in columns I and J of
8 Exhibit 305, for this year's March Forecast, re-pricing of market purchases and sales
9 results in a net increase in NPSE of \$100.9 million on a system basis. The re-pricing
10 of purchased power using a forward price curve increased the average market
11 purchase price of \$39.86 per MWh (as modeled in AURORA) to \$88.97 per MWh,
12 resulting in a \$120.8 million increase in NPSE on a system basis. The re-pricing of
13 surplus sales increased the average market sales price of \$35.79 per MWh (as
14 modeled in AURORA) to \$65.24 per MWh, resulting in an increase in surplus sales
15 revenue of \$19.9 million on a system basis.

16 **III. 2024 FORECAST NPSE**

17 **Q. Have you prepared an exhibit that summarizes the total NPSE for the March**
18 **Forecast?**

19 A. Yes. Exhibit 304 shows the results of the AURORA modeling determination of forecast
20 NPSE, as well as the re-pricing of market purchases and surplus sales and total
21 PURPA expense for the April 2024 through March 2025 test year.

22 **Q. What is the Company's March Forecast of NPSE as a result of the changes**
23 **described above?**

24 A. Exhibit 304 shows the results of a single water condition for the April 2024 through
25 March 2025 test period, with updated fuel prices, normalized load, updated stream
26 flow conditions, updated power purchases, and surplus sales from the Company's

1 ERMP (net hedges), market purchased power and surplus sales re-priced, and
2 updated PURPA contract expenses. The March Forecast of NPSE without PURPA
3 expenses is \$413.1 million. When PURPA expenses of \$242.9 million and EIM
4 benefits of \$48.1 million are included, total NPSE for the March Forecast is \$607.9
5 million. A discussion of EIM benefits is included later in testimony.

6 **Q. How does the 2024 March Forecast of NPSE compare to last year's March**
7 **Forecast of NPSE?**

8 A. The 2024 March Forecast of NPSE is \$607.9 million, or \$148.7 million less than the
9 2023 March Forecast of NPSE of \$756.5 million.⁶

10 **Q. How does the modeled generation in the 2024 March Forecast compare to last**
11 **year's March Forecast?**

12 A. To illustrate the changes in generation, Columns D (2023) and F (2024) of Exhibit 305
13 calculate the percentage of generation compared to total system load. For example,
14 Column F, line 1, shows that hydro provided 40 percent of the generation to meet the
15 total system load of 17,187,465 MWh ($6,941,080 / 17,187,465 = 40$ percent) compared
16 to 37 percent in the 2023 March Forecast. Coal generation decreased from 12 percent
17 to 9 percent, natural gas generation increased from 8 percent to 18 percent, market
18 purchased power decreased from 20 percent to 14 percent, PPA generation increased
19 from 5 percent to 7 percent, PURPA generation decreased from 18 percent to 17
20 percent, and lastly, surplus sales increased from 3 percent to 7 percent. This
21 comparison between resource type and total system load shows that reduced coal
22 generation and market purchases is being met with increased natural gas and PPA
23 generation. In addition, the increase in natural gas and PPA generation resulted in
24 increased opportunity to make economic off-system sales.

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26 ⁶ *In the Matter of Idaho Power Company's 2023 Annual Power Cost Update*, Docket No. UE 414,
Stipulation, Exhibit 2 at 1-2 (May 3, 2023).

1 **Q. Are the relative changes in expenses between resource types consistent with**
2 **the changes in output?**

3 A. The relative changes in expenses between resource types are mostly consistent with
4 the changes in output. The changes in expenses shown in columns D (2023) and F
5 (2024) of Exhibit 305 are as follows: coal fuel expense remained unchanged at 10
6 percent of total expense; natural gas expense increased from 6 percent to 22 percent;
7 market purchased power expense decreased from 51 percent to 36 percent; PPA
8 expense increased from 7 percent to 11 percent; PURPA expense increased from 31
9 percent to 40 percent; and surplus sales revenue increased from negative 6 percent
10 to negative 13 percent.

11 **Q. Please summarize the factors driving the change in NPSE as compared to last**
12 **year's March Forecast.**

13 A. The increase in hydro generation combined with the decrease in forward market prices
14 resulted in a 19 percent decrease in total forecast NPSE compared to last year's March
15 Forecast.

16 **A. EIM Costs and Benefits.**

17 **Q. Has the Company adjusted the NPSE amounts included in the 2024 APCU to**
18 **reflect Idaho Power's participation in the Western EIM?**

19 A. Yes. The NPSE requested for approval in the 2024 APCU includes both the
20 incremental benefits and costs associated with Idaho Power's participation in the
21 Western EIM. However, because EIM costs were included in the test year for the
22 Company's currently open general rate case, UE 426, with a requested rate effective
23 date of October 15, 2024,⁷ it has included EIM-related costs in the APCU for just the
24
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26 ⁷ *In the Matter of Idaho Power Company's Request for a General Rate Revision*, Docket No. UE 426.

1 period April 1, 2024 - October 14, 2024. In addition, EIM costs will not be included in
2 subsequent APCU filings once they are included in the Company's base rates.

3 **Q. What level of EIM benefits is Idaho Power proposing to include in the 2024**
4 **APCU?**

5 A. Idaho Power is proposing to include \$48.1 million in system EIM benefits as an offset
6 to NPSE in the 2024 APCU, as shown on Lines 55 and 47 of Exhibits 301 and 304,
7 respectively. On an Oregon allocated basis, the EIM benefits to be included in the
8 2024 APCU total \$2.0 million.

9 **Q. How does this compare to the level of EIM benefits included in the 2024 October**
10 **Update?**

11 A. The level of benefits included in this year's March Forecast (on a system-level) is \$0.3
12 million, or 0.7 percent, less than the level of benefits included in the October Update.

13 **Q. Please describe the data used in the EIM benefit calculation.**

14 A. As described in my Opening Testimony, Idaho Power's EIM benefit calculation utilizes
15 the CAISO report of EIM benefits as a starting point, and then accounts for necessary
16 adjustments to quantify ongoing cost savings benefits specific to Idaho Power's
17 participation in the EIM. These adjustments include a modification to the CAISO
18 methodology as it pertains to the hydro pricing cost structure. The Company updated
19 its EIM benefit calculation using the most recent 12-months of EIM benefit data from
20 CAISO, which includes data for February 2023 – January 2024. Exhibit 306 presents
21 Idaho Power's EIM benefit forecast for the 2024 APCU.

22 **Q. What is driving the change in the EIM benefits forecast from the prior year?**

23 A. The increased level of benefits for the 2024 APCU is largely attributable to a one-time
24 issue with pricing used for Bridger in April and May of 2023 that will not exist into the
25 future due to the conversion of Bridger Units 1 and 2 to natural gas in the first half of
26 2024.

1 **Q. Did the Company update the estimated EIM costs to be included in the 2024**
2 **APCU?**

3 A. Yes. The Company updated the annual revenue requirement associated with the EIM-
4 related costs to be included in the 2024 APCU. On an Oregon-allocated basis, the
5 revenue requirement associated with EIM costs to be included in the 2024 APCU is
6 \$64,289, as shown in Exhibit 307.

7 **B. Per-Unit Cost Calculation and Quantification of the Revenue**
8 **Requirement Impact.**

9 **Q. What is the March Forecast unit cost per MWh for this filing?**

10 A. Exhibit 304 shows total system NPSE of \$607.9 million and normalized annual sales
11 at the customer level for the April 2024 through March 2025 test year, net of Black
12 Mesa Solar's generation and Lamb Weston Surplus Sales, of 15,736,664 MWh,
13 resulting in a per-unit cost for the 2024 March Forecast of \$38.63 per MWh (\$607.9
14 million / 15.737 million MWh = \$38.63 per MWh) to become effective on June 1, 2024.

15 **Q. How does this year's March Forecast unit cost per MWh compare to last year's**
16 **March Forecast unit cost per MWh?**

17 A. The 2023 March Forecast unit cost per MWh was \$48.36 per MWh (\$756.5 million /
18 15.643 million MWh = \$48.36 per MWh), compared to this year's March Forecast unit
19 cost of \$38.63 per MWh.

20 **Q. Please describe the calculation necessary to determine the March Forecast rate.**

21 A. Exhibit 308 steps through the Commission-specified method of calculating the March
22 Forecast rate, pursuant to Order No. 08-238. Lines 1-3 show the calculation for the
23 October Update unit cost of \$30.78 per MWh. Lines 4-6 show the calculation for the
24 March Forecast unit cost of \$38.63 per MWh. Line 7 reflects the March Forecast unit
25 cost minus the October Update unit cost multiplied by the March Forecast Normalized
26 Sales (line 6 minus line 3 multiplied by line 4). Line 8 is the allocated amount (95

1 percent) that is allowed for the March Forecast rate. Line 9, the Forecast Change
2 Allowed, is calculated by multiplying line 7 by line 8. Line 10 divides line 9 by line 4 to
3 calculate the March Forecast rate of \$7.46 per MWh.

4 **Q. How does the \$7.46 per MWh compare to the March Forecast rate that resulted**
5 **from last year's computation?**

6 A. The March Forecast rate for last year's April 2023 through March 2024 test period was
7 \$16.68 per MWh, as compared to this year's April 2024 through March 2025 test period
8 rate of \$7.46 per MWh, a decrease of \$9.22 per MWh.

9 **Q. How is the revenue requirement for the March Forecast calculated using the**
10 **March Forecast rate unit cost of \$7.46 per MWh?**

11 A. The revenue requirement for the March Forecast is calculated by multiplying the March
12 Forecast rate of \$7.46 per MWh by the loss-adjusted Oregon jurisdictional sales for
13 the April 2024 through March 2025 test period of 656,167.451 MWh, resulting in a
14 revenue requirement of approximately \$4.9 million, as shown on page 2 of Exhibit 309,
15 line 1. Under the current March Forecast rate of \$16.68 per MWh, the revenue
16 requirement included in Oregon customer rates is approximately \$10.9 million. As
17 such, the proposed 2024 March Forecast rate of \$7.46 per MWh will result in a revenue
18 requirement decrease of \$6.0 million compared to what is currently being collected
19 through Oregon customer rates.

20 **Q. Did the Company revise the revenue requirement for the October Update?**

21 A. Yes. The Company revised the revenue requirement for the 2024 October Update to
22 align with the loss-adjusted sales that were used for the March Forecast filing. In
23 addition, Idaho Power updated the EIM benefits to reflect the most recent data
24 available.

25 The practice of updating the loss-adjusted sales for the October Update
26 revenue requirement is consistent with the method applied in all previous APCU filings.

1 The April 2024 through March 2025 loss-adjusted Oregon jurisdictional sales for the
2 October Update were 681,006.975 MWh, whereas the loss-adjusted Oregon
3 jurisdictional sales for the March Forecast are 656,167.451 MWh, a decrease of
4 24,839.524 MWh. The change in the loss-adjusted sales, as well as the EIM benefit
5 number, increases the October Update revenue requirement from an initial decrease
6 of \$101,556 to a decrease of \$41,206. Exhibit 309 contains the revised October
7 Update revenue requirement.

8 **IV. RATE IMPLEMENTATION**

9 **Q. What method of allocation are you proposing to spread the revenue requirement**
10 **decrease associated with the 2024 APCU to the various customer classes?**

11 A. The Company proposes to allocate the revenue requirement associated with the 2024
12 APCU according to the revenue spread methodology agreed upon in the 2018
13 Stipulation. The 2018 Stipulation established a revenue spread methodology whereby
14 the APCU revenue requirement is allocated to individual customer classes on the basis
15 of normalized jurisdictional forecasted sales at the generation level for the test period.
16 Additionally, any rate increases resulting from application of this revenue spread
17 methodology as applied to a customer class will be capped at 3 percent above the
18 overall average rate increase on a percentage of total revenue basis. In this case, the
19 overall average rate change is a decrease, so the revenue cap does not apply.

20 **Q. What is the overall revenue impact of this year's combined October Update and**
21 **March Forecast compared to last year's combined October Update and March**
22 **Forecast using the rate spread methodology described above?**

23 A. Exhibit 309 provides a summary of the revenue change resulting from this year's
24 combined October Update and March Forecast as compared to current revenue. As
25 can be seen in Exhibit 309, the overall revenue impact of this year's combined October
26 Update and March Forecast is a decrease of \$6.1 million or 9.2 percent overall. The

1 \$6.1 million decrease reflects a decrease of \$41,206 in base rate revenues associated
2 with the October Update and a \$6.0 million decrease in Schedule 55 revenues
3 associated with the March Forecast.

4 **Q. Does the Company intend to provide supporting workpapers for the 2024 March**
5 **Forecast to Staff and CUB?**

6 A. Yes. Idaho Power will provide its supporting workpapers to Staff and CUB within five
7 business days of filing the 2024 March Forecast.

8 **Q. Does this conclude your testimony?**

9 A. Yes, it does.

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Idaho Power/301
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 301

Total Normalized Base Net Power Supply Expense for the 2024 October Update

March 25, 2024

Idaho Power/302
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 302

AURORA Modeled Determination of Expected Power Supply Expense for the
2024 March Forecast

March 25, 2024

Idaho Power/303
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 303

Forward Price Curves Used for Re-Pricing Purchased Power and Surplus Sales

March 25, 2024

IDAHO POWER COMPANY
Mid-Columbia Heavy Load and Light Load Daily Forward Curves
Used to Re-Price Purchased Power (PP) and Surplus Sales (SS) for the APCU March Forecast

| <u>Line</u> | Mid-Columbia Forward Price Curve on: | Apr-24 | May-24 | Jun-24 | Jul-24 | Aug-24 | Sep-24 | Oct-24 | Nov-24 | Dec-24 | Jan-25 | Feb-25 | Mar-25 |
|-------------|---|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| 1 | 3/13/2024 | | | | | | | | | | | | |
| 2 | mc HL | 37.30 | 27.55 | 45.05 | 105.45 | 157.70 | 124.15 | 66.95 | 72.85 | 109.05 | 121.00 | 95.25 | 64.25 |
| 3 | mc LL | 34.00 | 17.90 | 28.00 | 41.05 | 59.25 | 60.85 | 53.05 | 57.05 | 81.85 | 98.70 | 79.55 | 49.45 |
| 4 | Reallocated Prices | Apr-24 | May-24 | Jun-24 | Jul-24 | Aug-24 | Sep-24 | Oct-24 | Nov-24 | Dec-24 | Jan-25 | Feb-25 | Mar-25 |
| 5 | HL PP | | | | | | | | | | | | |
| 6 | 100.0% | 37.30 | 27.55 | 45.05 | 105.45 | 157.70 | 124.15 | 66.95 | 72.85 | 109.05 | 121.00 | 95.25 | 64.25 |
| 7 | LL PP | | | | | | | | | | | | |
| 8 | 100.0% | 34.00 | 17.90 | 28.00 | 41.05 | 59.25 | 60.85 | 53.05 | 57.05 | 81.85 | 98.70 | 79.55 | 49.45 |
| 9 | HL SS | | | | | | | | | | | | |
| 10 | 100.0% | 37.30 | 27.55 | 45.05 | 105.45 | 157.70 | 124.15 | 66.95 | 72.85 | 109.05 | 121.00 | 95.25 | 64.25 |
| 11 | LL SS | | | | | | | | | | | | |
| 12 | 100.0% | 34.00 | 17.90 | 28.00 | 41.05 | 59.25 | 60.85 | 53.05 | 57.05 | 81.85 | 98.70 | 79.55 | 49.45 |

Idaho Power/304
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 304

Total Expected Net Power Supply Expense for the 2024 March Forecast

March 25, 2024

Idaho Power/305
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

IDAHO POWER COMPANY

UE 425

Exhibit 305

Year-Over-Year Differences in March Forecast Net Power Supply Expense

March 25, 2024

IDAHO POWER COMPANY
YEAR OVER YEAR DIFFERENCES IN AURORA DEVELOPED NPSE
2024 March Forecast

| AURORA DEVELOPED NPSE RESULTS BEFORE MARKET ENERGY RE-PRICING | | | | REPRICED USING FORWARD MARKET PRICES | | | | | | DIFFERENCES | | | |
|---|--|--------------------------|--------------------------|--|--------------------------|------|--------------------------|------|---------------|---------------------------|---------------|----------------|--|
| GENERATION | | | | GENERATION | | | | | | GENERATION | | | |
| Line No. | Resource Type | A 2023 March Forecast | B 2024 March Forecast | Resource Type | C 2023 March Forecast | D | E 2024 March Forecast | F | G (B-A) | H (E-C) | I (C-A) | J (E-B) | |
| 1 | Hydro (MWh) | 6,396,200 | 6,941,080 | Hydro (MWh) | 6,396,200 | 37% | 6,941,080 | 40% | 544,880 | 544,880 | - | - | |
| 2 | Coal (MWh) | 1,998,607 | 1,573,119 | Coal (MWh) | 1,998,607 | 12% | 1,573,119 | 9% | (425,488) | (425,488) | - | - | |
| 3 | Natural Gas (MWh) | 1,295,851 | 3,153,488 | Natural Gas (MWh) | 1,295,851 | 8% | 3,153,488 | 18% | 1,857,637 | 1,857,637 | - | - | |
| 4 | Market Purchased Power (MWh) | 3,377,535 | 2,459,619 | Market Purchased Power (MWh) | 3,377,535 | 20% | 2,459,619 | 14% | (917,916) | (917,916) | - | - | |
| 5 | Purchased Power Agreements (MWh) | 935,126 | 1,206,141 | Purchased Power Agreements (MWh) | 935,126 | 5% | 1,206,141 | 7% | 271,015 | 271,015 | - | - | |
| 6 | Storage (MWh) | (24,402) | (60,351) | Storage (MWh) | (24,402) | 0% | (60,351) | 0% | (35,948) | (35,948) | - | - | |
| 7 | Other* | - | 18,020 | Other* | - | 0% | 18,020 | 0% | 18,020 | 18,020 | - | - | |
| 8 | Net Hedges | 635,536 | 160,184 | Net Hedges | 635,536 | 4% | 160,184 | 1% | (475,352) | (475,352) | - | - | |
| 9 | PURPA (MWh) | 2,998,075 | 2,935,562 | PURPA (MWh) | 2,998,075 | 18% | 2,935,562 | 17% | (62,513) | (62,513) | - | - | |
| 10 | Surplus Sales (MWh) | 555,457 | 1,199,398 | Surplus Sales (MWh) | 555,457 | -3% | 1,199,398 | -7% | 643,941 | 643,941 | - | - | |
| 11 | System Generation (MWh) | 17,612,527 | 18,386,862 | System Generation (MWh) | 17,612,527 | | 18,386,862 | | | | | | |
| 12 | System Load (MWh) | 17,057,070 | 17,187,465 | System Load (MWh) | 17,057,070 | 100% | 17,187,465 | 100% | 130,394 | 130,394 | - | - | |
| 13 | System Load (aMW) | 1,947 | 1,962 | System Load (aMW) | 1,947 | | 1,962 | | 15 | 15 | - | - | |
| NET POWER SUPPLY EXPENSES | | | | NET POWER SUPPLY EXPENSES | | | | | | NET POWER SUPPLY EXPENSES | | | |
| Line No. | Resource Type | A 2023 March Forecast | B 2024 March Forecast | Resource Type | C 2023 March Forecast | D | E 2024 March Forecast | F | G (B-A) | H (E-C) | I (C-A) | J (E-B) | |
| 13 | Hydro (\$ x 1000) | \$ - | \$ - | Hydro (\$ x 1000) | \$ - | | \$ - | | \$ - | \$ - | \$ - | \$ - | |
| 14 | Coal (\$ x 1000) | \$ 72,082.1 | \$ 62,924.5 | Coal (\$ x 1000) | \$ 72,082.1 | 10% | \$ 62,924.5 | 10% | \$ (9,157.5) | \$ (9,157.5) | \$ - | \$ - | |
| 15 | Natural Gas (\$ x 1000) | \$ 43,596.5 | \$ 132,552.2 | Natural Gas (\$ x 1000) | \$ 43,596.5 | 6% | \$ 132,552.2 | 22% | \$ 88,955.6 | \$ 88,955.6 | \$ - | \$ - | |
| 16 | Market Purchased Power (\$ x 1000) | \$ 101,029.7 | \$ 98,045.8 | Market Purchased Power (\$ x 1000) | \$ 384,086.0 | 51% | \$ 218,834.0 | 36% | \$ (2,983.9) | \$ (165,252.0) | \$ 283,056.3 | \$ 120,788.19 | |
| 17 | Purchased Power Agreements (\$ x 1000) | \$ 53,853.0 | \$ 65,369.3 | Purchased Power Agreements (\$ x 1000) | \$ 53,853.0 | 7% | \$ 65,369.3 | 11% | \$ 11,516.3 | \$ 11,516.3 | \$ - | \$ - | |
| 18 | Storage (\$ x 1000) | \$ - | \$ - | Storage (\$ x 1000) | \$ - | 0% | \$ - | 0% | \$ - | \$ - | \$ - | \$ - | |
| 19 | Net Hedges | \$ 46,387.5 | \$ 11,660.1 | Net Hedges | \$ 46,387.5 | 6% | \$ 11,660.1 | 2% | \$ - | \$ (34,727.5) | \$ - | \$ - | |
| 20 | PURPA (\$ x 1000) | \$ 233,010.9 | \$ 242,857.0 | PURPA (\$ x 1000) | \$ 233,010.9 | 31% | \$ 242,857.0 | 40% | \$ 9,846.2 | \$ 9,846.2 | \$ - | \$ - | |
| 21 | Surplus Sales (\$ x 1000) | \$ (17,461.5) | \$ (58,343.7) | Surplus Sales (\$ x 1000) | \$ (41,762.4) | -6% | \$ (78,251.4) | -13% | \$ (40,882.1) | \$ (36,489.0) | \$ (24,300.9) | \$ (19,907.72) | |
| 22 | EIM Benefits | \$ (34,739.0) | \$ (48,085.5) | EIM Benefits | \$ (34,739.0) | -5% | \$ (48,085.5) | -8% | \$ (13,346.5) | \$ (13,346.5) | \$ - | \$ - | |
| 23 | Total System (\$ x 1000) | \$ 497,759.2 | \$ 506,979.7 | Total System (\$ x 1000) | \$ 756,514.6 | 100% | \$ 607,860.2 | 100% | \$ 9,220.5 | \$ (148,654.4) | \$ 258,755.4 | \$ 100,880.5 | |

Idaho Power/306
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 306

Energy Imbalance Market Benefit

March 25, 2024

IDAHO POWER COMPANY
2024 APCU March Forecast
Energy Imbalance Market Benefit Forecast
Based on February 2023-January 2024 Historical Data

| | | (A) | (B) | (C) | (F) |
|--------------|-----------|----------------------|----------------------------|--------------------------------------|-------------------------|
| Year | Month | CAISO Benefit | Zero-cost Hydro Adjustment | Hydro Net (Export)/Import Adjustment | Idaho Power EIM Benefit |
| 2023 | February | \$ 3,332,363 | \$ 1,235,784 | \$ 778,353 | \$ 2,014,137 |
| 2023 | March | \$ 3,674,335 | \$ 2,800,432 | \$ (9,341) | \$ 2,791,091 |
| 2023 | April | \$ 8,429,942 | \$ 9,549,223 | \$ (155,659) | \$ 9,393,563 |
| 2023 | May | \$ 17,861,967 | \$ 17,106,028 | \$ 6,612 | \$ 17,112,640 |
| 2023 | June | \$ 5,232,257 | \$ 4,020,478 | \$ (73,071) | \$ 3,947,408 |
| 2023 | July | \$ 3,453,712 | \$ 2,255,875 | \$ (702,437) | \$ 1,553,438 |
| 2023 | August | \$ 3,024,493 | \$ 1,402,323 | \$ (54,594) | \$ 1,347,730 |
| 2023 | September | \$ 2,149,343 | \$ 1,675,130 | \$ (301,780) | \$ 1,373,350 |
| 2023 | October | \$ 4,267,170 | \$ 2,515,778 | \$ (539,694) | \$ 1,976,084 |
| 2023 | November | \$ 3,397,213 | \$ 2,114,869 | \$ 20,492 | \$ 2,135,360 |
| 2023 | December | \$ 1,801,242 | \$ 309,091 | \$ 334,708 | \$ 643,799 |
| 2024 | January | \$ 7,650,267 | \$ 6,644,252 | \$ (2,847,348) | \$ 3,796,904 |
| Total | | \$ 64,274,305 | \$ 51,629,263 | \$ (3,543,760) | \$ 48,085,503 |

Idaho Power/307
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 307

Energy Imbalance Market Costs

March 25, 2024

**Idaho Power Company
2024 APCU
EIM Costs & Benefits**

2023 Calendar Year Revenue Requirement

| | |
|--|-----------------|
| Capital Investment | \$368,373 |
| ADIT | (\$11,114) |
| Accumulated Depreciation | (\$12,810) |
| Amortization of Other Plant | (\$209,621) |
| Net Rate Base | \$134,829 |
| Return on Rate Base | \$10,459 |
| O&M (On-going) | \$85,492 |
| Depreciation | \$20,720 |
| Taxes | (\$27,974) |
| Total Operating Expenses | \$78,238 |
| Net-to-Gross Tax Multiplier | 1.347 |
| Total Annual Revenue Requirement | \$119,441 |
| Total Rev Req (4/1/24 - 10/14/24) | \$64,289 |

EIM Benefits

| | |
|--------------------------------------|-------------------|
| Oregon Allocated EIM Benefits | (\$64,289) |
| Impact to NPSE | \$0 |

Idaho Power/308
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 308

October Update and March Forecast Combined Rate Calculation

March 25, 2024

Idaho Power Company
2024 APCU Combined Rate Calculation
April 2024 - March 2025

| <u>Line</u> | <u>OCTOBER UPDATE</u> | |
|-------------|---|-----------------------|
| 1 | Forecast of Normalized Sales (MWh) | 15,739,816 |
| 2 | Total Net Power Supply Expense | <u>\$484,523,606</u> |
| 3 | October APCU Unit Cost (\$/MWh) | \$30.78 |
| | <u>MARCH FORECAST</u> | |
| 4 | Forecast of Normalized Sales (MWh) | 15,736,664 |
| 5 | Total Net Power Supply Expense | <u>\$607,860,187</u> |
| 6 | March Forecast Unit Cost (\$/MWh) | \$38.63 |
| 7 | Sales Adjusted Forecast Power Cost Change | \$123,532,811 |
| 8 | Portion of Change Allowed | <u>95%</u> |
| 9 | Forecast Change Allowed | \$117,356,171 |
| 10 | March Forecast Rate (\$/MWh) | \$7.46 |
| 11 | <u>Combined Rate (\$/MWh)</u> | <u>\$38.24</u> |

Idaho Power/309
Witness: Jessica G. Brady

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UE 425

IDAHO POWER COMPANY

Exhibit 309

Stipulated Revenue Spread and Revenue Impact

March 25, 2024

Idaho Power Company
Stipulated Revenue Spread
2024 APCU October Update

| | | |
|----------|--|---------------|
| Line No. | 2023 October Update Oregon Jurisdictional Share of Base NPSE = \$30.78/MWh x 656,167.451 MWhs = | \$ 20,196,834 |
| 1 | | |
| 2 | Oregon Allocated EIM Costs* | \$ 64,289 |
| 3 | Proposed October Update APCU Revenue Requirement | \$ 20,261,123 |

| | TOTAL SYSTEM | RESIDENTIAL (1) | RESIDENTIAL TOD PILOT (5) | GEN SRV (7) | GEN SRV SECONDARY (9-S) | GEN SRV PRIMARY (9-P) | GEN SRV TRANS (9-T) | AREA LIGHTING (15) | LG POWER PRIMARY (19-P) | LG POWER TRANS (19-T) | IRRIGATION SECONDARY (24-S) | UNMETERED GEN SERVICE (40) | MUNICIPAL ST LIGHT (41) | TRAFFIC CONTROL (42) | |
|----|--|-----------------|---------------------------|-------------|-------------------------|-----------------------|---------------------|--------------------|-------------------------|-----------------------|-----------------------------|----------------------------|-------------------------|----------------------|----------|
| 4 | April 2022 - March 2023 Generation Level Normalized Sales (kWh) | 696,529,652 | 208,505,679 | 130,124 | 20,564,278 | 118,310,551 | 22,022,758 | 3,140,157 | 235,793 | 155,691,934 | 97,785,417 | 69,701,496 | 5,787 | 412,852 | 22,827 |
| 5 | Class Share of April 2022 - March 2023 Generation Level Normalized Sales (kWh) | 100% | 29.93% | 0.02% | 2.95% | 16.99% | 3.16% | 0.45% | 0.03% | 22.35% | 14.04% | 10.01% | 0.00% | 0.06% | 0.00% |
| 6 | 2021 October Update Class Allocated Base NPSE | \$ 20,261,123 | \$ 6,065,154 | \$ 3,785 | \$ 598,188 | \$ 3,441,497 | \$ 640,613 | \$ 91,343 | \$ 6,859 | \$ 4,528,872 | \$ 2,844,448 | \$ 2,027,524 | \$ 168 | \$ 12,009 | \$ 664 |
| 7 | June 2022 - May 2023 Loss-Adjusted Normalized Sales (kWh) | 656,419,089 | 194,241,834 | 121,119 | 19,151,261 | 110,181,444 | 20,956,450 | 3,051,659 | 219,547 | 148,156,195 | 95,029,560 | 64,898,972 | 5,388 | 384,406 | 21,254 |
| 8 | Proposed APCU Rates for 2024 October Update (\$/kWh) | 0.030866 | 0.031225 | 0.031251 | 0.031235 | 0.031235 | 0.030569 | 0.029932 | 0.031241 | 0.030568 | 0.029932 | 0.031241 | 0.031241 | 0.031241 | 0.031241 |
| 9 | Proposed October Update APCU Revenue Requirement | \$ 20,261,123 | \$ 6,065,154 | \$ 3,785 | \$ 598,188 | \$ 3,441,497 | \$ 640,613 | \$ 91,343 | \$ 6,859 | \$ 4,528,872 | \$ 2,844,448 | \$ 2,027,524 | \$ 168 | \$ 12,009 | \$ 664 |
| 10 | APCU Rates for 2023 October Update (\$/kWh) - Order No. 23-184 | 0.030889 | 0.031490 | 0.031490 | 0.031451 | 0.031449 | 0.030454 | 0.029708 | 0.031490 | 0.030420 | 0.029651 | 0.031449 | 0.031483 | 0.031490 | 0.031488 |
| 11 | June 2022 - May 2023 Loss-Adjusted Normalized Sales (kWh) | 656,419,089 | 194,241,834 | 121,119 | 19,151,261 | 110,181,444 | 20,956,450 | 3,051,659 | 219,547 | 148,156,195 | 95,029,560 | 64,898,972 | 5,388 | 384,406 | 21,254 |
| 12 | Base NPSE Recovered under Current APCU Rates | \$ 20,302,329 | \$ 6,116,632 | \$ 3,814 | \$ 602,333 | \$ 3,465,106 | \$ 638,204 | \$ 90,660 | \$ 6,914 | \$ 4,506,972 | \$ 2,817,729 | \$ 2,041,023 | \$ 170 | \$ 12,105 | \$ 669 |

Idaho Power Company
Stipulated Revenue Spread
2024 APCU March Forecast

Line No.

1 Oregon Jurisdictional Share of 2024 March Forecast NPSE = \$7.46/MWh x 656,167.451 MWhs = \$ 4,895,009

| | TOTAL SYSTEM | RESIDENTIAL (1) | RESIDENTIAL TOD PILOT (5) | GEN SRV (7) | GEN SRV SECONDARY (9-S) | GEN SRV PRIMARY (9-P) | GEN SRV TRANS (9-T) | AREA LIGHTING (15) | LG POWER PRIMARY (19-P) | LG POWER TRANS (19-T) | IRRIGATION SECONDARY (24-S) | UNMETERED GEN SERVICE (40) | MUNICIPAL ST LIGHT (41) | TRAFFIC CONTROL (42) |
|--|---------------|-----------------|---------------------------|-------------|-------------------------|-----------------------|---------------------|--------------------|-------------------------|-----------------------|-----------------------------|----------------------------|-------------------------|----------------------|
| 2 April 2024 - March 2025 Generation Level Normalized Sales (kWh) | 696,529,652 | 208,505,679 | 130,124 | 20,564,278 | 118,310,551 | 22,022,758 | 3,140,157 | 235,793 | 155,691,934 | 97,785,417 | 69,701,496 | 5,787 | 412,852 | 22,827 |
| 3 Class Share of April 2024 - March 2025 Generation Level Normalized Sales (kWh) | 100% | 29.93% | 0.02% | 2.95% | 16.99% | 3.16% | 0.45% | 0.03% | 22.35% | 14.04% | 10.01% | 0.00% | 0.06% | 0.00% |
| 4 2023 March Forecast Class Allocated NPSE | \$ 4,895,009 | \$ 1,465,318 | \$ 914 | \$ 144,520 | \$ 831,452 | \$ 154,770 | \$ 22,068 | \$ 1,657 | \$ 1,094,158 | \$ 687,208 | \$ 489,842 | \$ 41 | \$ 2,901 | \$ 160 |
| 5 June 2024 - May 2025 Loss-Adjusted Normalized Sales (kWh) | 656,419,089 | 194,241,834 | 121,119 | 19,151,261 | 110,181,444 | 20,956,450 | 3,051,659 | 219,547 | 148,156,195 | 95,029,560 | 64,898,972 | 5,388 | 384,406 | 21,254 |
| 6 Proposed APCU Rates for 2023 March Forecast (\$/kWh) | 0.007457 | 0.007544 | 0.007550 | 0.007546 | 0.007546 | 0.007385 | 0.007232 | 0.007548 | 0.007385 | 0.007232 | 0.007548 | 0.007548 | 0.007548 | 0.007548 |
| 7 Proposed March Forecast Revenue Requirement | \$ 4,895,009 | \$ 1,465,318 | \$ 914 | \$ 144,520 | \$ 831,452 | \$ 154,770 | \$ 22,068 | \$ 1,657 | \$ 1,094,158 | \$ 687,208 | \$ 489,842 | \$ 41 | \$ 2,901 | \$ 160 |
| 8 Current APCU Rates for 2023 March Forecast (\$/kWh) - Order No. 23-184 | 0.016641 | 0.016965 | 0.016965 | 0.016944 | 0.016943 | 0.016407 | 0.016005 | 0.016965 | 0.016389 | 0.015974 | 0.016943 | 0.016961 | 0.016965 | 0.016964 |
| 9 June 2024 - May 2025 Loss-Adjusted Normalized Sales (kWh) | 656,419,089 | 194,241,834 | 121,119 | 19,151,261 | 110,181,444 | 20,956,450 | 3,051,659 | 219,547 | 148,156,195 | 95,029,560 | 64,898,972 | 5,388 | 384,406 | 21,254 |
| 10 NPSE Recovered under Current March Forecast Rates | \$ 10,937,563 | \$ 3,295,240 | \$ 2,055 | \$ 324,498 | \$ 1,866,772 | \$ 343,822 | \$ 48,842 | \$ 3,725 | \$ 2,428,061 | \$ 1,518,007 | \$ 1,099,569 | \$ 91 | \$ 6,521 | \$ 361 |

Idaho Power Company
Calculation of Revenue Impact
State of Oregon
Revised October Update / March Forecast Filing
Effective June 1, 2024

Summary of Revenue Impact
Current Billed Revenue to Proposed Billed Revenue

| Line No. | Tariff Description | Rate Sch. No. | Average Number of Customers ⁽¹⁾ | Normalized Energy (kWh) ⁽¹⁾ | Current Base Revenue w/o NPSE | Current Base NPSE Revenue | Total Current Base Revenue | 2024 October Update Proposed Base NPSE Revenue | Total Proposed Base Revenue | 2024 October Update Proposed Adjustments to Base Revenue | 2024 October Update Base Revenue Percent Change | Current Billed Revenue w/o March Forecast | Current Billed March Forecast Revenue | Total Current Billed Revenue | 2024 March Forecast Proposed Revenue | 2024 March Forecast Proposed Adjustments to Billed Revenue | 2024 March Forecast Revenue Percent Change | 2024 Composite APCCU Revenue Adjustment | Proposed Total Billed Revenue | 2024 Composite APCCU Percent Change |
|------------------------------|---|---------------|--|--|-------------------------------|---------------------------|----------------------------|--|-----------------------------|--|---|---|---------------------------------------|------------------------------|--------------------------------------|--|--|---|-------------------------------|-------------------------------------|
| Uniform Tariff Rates: | | | | | | | | | | | | | | | | | | | | |
| 1 | Residential Service | 1 | 13,812 | 194,241,834 | \$ 12,574,204 | \$ 6,116,632 | \$ 18,690,835 | \$ 6,065,154 | \$ 18,639,357 | \$ (51,478) | (0.28)% | \$ 19,150,507 | \$ 3,295,240 | \$ 22,445,747 | \$ 1,465,318 | \$ (1,829,922) | (8.15)% | \$ (1,881,400) | \$ 20,564,346 | (8.38)% |
| 2 | Residential Service - Time-of-Day Pilot | 5 | 4 | 121,119 | \$ 7,451 | \$ 3,814 | \$ 11,265 | \$ 3,785 | \$ 11,236 | \$ (29) | (0.25)% | \$ 11,551 | \$ 2,055 | \$ 13,606 | \$ 914 | \$ (1,140) | (8.38)% | \$ (1,169) | \$ 12,437 | (8.59)% |
| 3 | Small General Service | 7 | 2,745 | 19,151,261 | \$ 1,472,172 | \$ 602,333 | \$ 2,074,506 | \$ 598,188 | \$ 2,070,360 | \$ (4,146) | (0.20)% | \$ 2,112,234 | \$ 324,498 | \$ 2,436,732 | \$ 144,520 | \$ (179,978) | (7.39)% | \$ (184,123) | \$ 2,252,608 | (7.56)% |
| 4 | Large General Secondary | 9S | 960 | 110,181,444 | \$ 5,476,157 | \$ 3,465,106 | \$ 8,941,262 | \$ 3,441,497 | \$ 8,917,653 | \$ (23,609) | (0.26)% | \$ 9,151,579 | \$ 1,866,772 | \$ 11,018,350 | \$ 831,452 | \$ (1,035,319) | (9.40)% | \$ (1,058,928) | \$ 9,959,422 | (9.61)% |
| 5 | Large General Primary | 9P | 9 | 20,956,450 | \$ 894,543 | \$ 638,204 | \$ 1,532,747 | \$ 640,613 | \$ 1,535,156 | \$ 2,409 | 0.16% | \$ 1,572,425 | \$ 343,822 | \$ 1,916,247 | \$ 154,770 | \$ (189,053) | (9.87)% | \$ (186,644) | \$ 1,729,603 | (9.74)% |
| 6 | Large General Transmission | 9T | 1 | 3,051,659 | \$ 108,176 | \$ 90,660 | \$ 198,836 | \$ 91,343 | \$ 199,519 | \$ 683 | 0.34% | \$ 204,555 | \$ 48,842 | \$ 253,397 | \$ 22,068 | \$ (26,773) | (10.57)% | \$ (26,090) | \$ 227,306 | (10.30)% |
| 7 | Dusk to Dawn Lighting | 15 | 0 | 219,547 | \$ 102,205 | \$ 6,914 | \$ 109,118 | \$ 6,859 | \$ 109,064 | \$ (55) | (0.05)% | \$ 109,623 | \$ 3,725 | \$ 113,348 | \$ 1,657 | \$ (2,067) | (1.82)% | \$ (2,122) | \$ 111,226 | (1.87)% |
| 8 | Large Power Primary | 19P | 5 | 148,156,195 | \$ 4,949,395 | \$ 4,506,972 | \$ 9,456,367 | \$ 4,528,872 | \$ 9,478,266 | \$ 21,900 | 0.23% | \$ 9,734,042 | \$ 2,428,061 | \$ 12,162,103 | \$ 1,094,158 | \$ (1,333,903) | (10.97)% | \$ (1,312,003) | \$ 10,850,099 | (10.79)% |
| 9 | Large Power Transmission | 19T | 1 | 95,029,560 | \$ 3,325,000 | \$ 2,817,729 | \$ 6,142,728 | \$ 2,844,448 | \$ 6,169,448 | \$ 26,719 | 0.43% | \$ 6,320,830 | \$ 1,518,007 | \$ 7,838,837 | \$ 687,208 | \$ (830,800) | (10.60)% | \$ (804,080) | \$ 7,034,757 | (10.26)% |
| 10 | Agricultural Irrigation Service | 24 | 2,309 | 64,898,972 | \$ 4,577,952 | \$ 2,041,023 | \$ 6,618,975 | \$ 2,027,524 | \$ 6,605,476 | \$ (13,498) | (0.20)% | \$ 6,746,067 | \$ 1,099,569 | \$ 7,845,636 | \$ 489,842 | \$ (609,727) | (7.77)% | \$ (623,226) | \$ 7,222,430 | (7.94)% |
| 11 | Unmetered General Service | 40 | 2 | 5,388 | \$ 186 | \$ 170 | \$ 356 | \$ 168 | \$ 355 | \$ (1) | (0.37)% | \$ 366 | \$ 91 | \$ 457 | \$ 41 | \$ (51) | (11.08)% | \$ (52) | \$ 406 | (11.37)% |
| 12 | Street Lighting | 41 | 27 | 384,406 | \$ 134,347 | \$ 12,105 | \$ 146,452 | \$ 12,009 | \$ 146,356 | \$ (96) | (0.07)% | \$ 147,285 | \$ 6,521 | \$ 153,806 | \$ 2,901 | \$ (3,620) | (2.35)% | \$ (3,715) | \$ 150,091 | (2.42)% |
| 13 | Traffic Control Lighting | 42 | 11 | 21,254 | \$ 1,520 | \$ 669 | \$ 2,189 | \$ 664 | \$ 2,184 | \$ (5) | (0.24)% | \$ 2,231 | \$ 361 | \$ 2,591 | \$ 160 | \$ (200) | (7.72)% | \$ (205) | \$ 2,386 | (7.93)% |
| 14 | Total Uniform Tariffs | | 19,886 | 656,419,089 | \$ 33,623,307 | \$ 20,302,329 | \$ 53,925,636 | \$ 20,261,123 | \$ 53,884,431 | \$ (41,206) | (0.08)% | \$ 55,263,313 | \$ 10,937,563 | \$ 66,200,877 | \$ 4,895,009 | \$ (6,042,554) | (9.13)% | \$ (6,083,760) | \$ 60,117,117 | (9.19)% |
| 15 | Total Oregon Retail Sales | | 19,886 | 656,419,089 | \$ 33,623,307 | \$ 20,302,329 | \$ 53,925,636 | \$ 20,261,123 | \$ 53,884,431 | \$ (41,206) | (0.08)% | \$ 55,263,313 | \$ 10,937,563 | \$ 66,200,877 | \$ 4,895,009 | \$ (6,042,554) | | \$ (6,083,760) | \$ 60,117,117 | (9.19)% |

(1) Updated June 2024-May 2025 Test Year