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October 24, 2007

VIA ELECTRONIC FILING

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket No. UM 1261

Enclosed for filing in the above-referenced docket are an original and five copies of the Stipulation by the joint Parties and the Joint Direct Testimony of Carla Owings, Michael J. Youngblood, and Lowrey Brown.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

McIndos

Very truly yours,

Wendy L. McIndoo

cc: Service List

CERTIFICATE OF SERVICE 1 2 I hereby certify that I served a true and correct copy of the foregoing document in 3 Docket UM 1261 on the following named person(s) on the date indicated below by email 4 and first-class mail addressed to said person(s) at his or her last-known address(es) 5 indicated below. 6 Stephanie S. Andrus **OPUC Dockets** Department of Justice Citizens' Utility Board of Oregon 7 Regulated Utility & Business Section 610 SW Broadway Ste 308 1162 Court St NE Portland, OR 97205 8 Salem, OR 97301-4096 dockets@oregoncub.org stephanie.andrus@state.or.us 9 DATED: October 24, 2007. 10 11 L. Mc Indoo 12 Wendy L. McIndoo Legal Assistant 13 14 15 16 17 18 19 20 21 22 23 24 25 26

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1261

In the Matter of IDAHO POWER COMPANY Application for Authorization to Defer for Future Rate Recovery Certain Excess Net Power Supply Expenses.

JOINT DIRECT TESTIMONY

OF

CARLA OWINGS

MICHAEL J. YOUNGBLOOD

AND

LOWREY BROWN

OCTOBER 19, 2007

1 Introduction Please state your names, occupations, and business addresses. 2 Q. 3 My name is Carla Owings. I am employed by the Public Utility Commission Α. 4 of Oregon ("Staff") as a Senior Economist. My business address is 550 Capitol 5 Street NE, Suite 215, Salem, Oregon 97301-2551. My qualifications are show in 6 Staff/Idaho Power/CUB Exhibit 101. 7 My name is Michael J. Youngblood. I am employed by Idaho Power Company ("Idaho Power") as the Regulatory Affairs Representative. My business 8 9 address is 1221 West Idaho Street, Boise, Idaho 83702. My qualifications are shown 10 in Staff/Idaho Power/CUB Exhibit 102. 11 My name is Lowrey Brown. I am a Utility Analyst for the Citizens' Utility 12 Board of Oregon ("CUB"). My business address is 610 SW Broadway, Suite 308, Portland, Oregon 97205. My qualifications are listed in Staff/Idaho Power/CUB 13 14 Exhibit 103. 15 Q. Are Staff, Idaho Power and CUB (the "Parties") all of the Parties to this proceeding? 16 17 A. Yes. 18 Q. What is the purpose of your joint testimony? 19 Α. The purpose of our joint testimony is to describe and support the Stipulation dated 20 October 19, 2007 (the "Stipulation") of the Parties to settle all of the issues arising 21 out of Idaho Power's April 28, 2006 Application for authorization to defer for future 22 rate recovery certain excess net power supply expenses. The Stipulation is being 23 submitted to the Commission as Staff/Idaho Power/CUB Exhibit 104. Could you summarize the major issues addressed in the Stipulation? 24 Q. 25 A. First, the Stipulation describes the Parties' agreement that Idaho Power incurred 26 significant excess power supply expenses in 2006, which merit deferral for future

recovery in rates. Second, the Stipulation confirms the Parties' agreement that, without deferred accounting, these excess net power supply expenses would impose a significant financial impact on Idaho Power. Third, the Stipulation describes the process by which the Parties arrived at a deferral amount.

Authorization of Deferred Accounting

- On all of the Parties agree that Idaho Power should be authorized to defer a portion of its excess net power supply expenses for the period May 1, 2006 through April 30, 2007?
- 9 A. Yes. As described in the Stipulation, from May 1, 2006 to April 30, 2007, Idaho
 10 Power incurred \$163.3 million on a system-wide basis in excess power supply
 11 expenses. All of the parties agree that the Company should be allowed to recover a
 12 portion of these costs in future rates.
- 13 Q. What were the reasons for the excess power supply expenses?

A.

In addition to three years of system load growth since the 2003 test period used to set rates, the primary reasons for significant excess power supply expenses were the following: First, early in the year the predictions were for continuing drought conditions. These predictions turned out to be erroneous; however, based upon these predictions, Idaho Power reasonably entered into Power Purchase Agreements that served to increase its power costs beyond those anticipated. Secondly, for the period October 2006 through March 2007, streamflows were significantly less than expected due to drier conditions in the region that drove hydro generation down and net power supply costs up. Under normal streamflow conditions, nearly half of Idaho Power's energy is produced by its hydroelectric generating plants, and low streamflow conditions result in the Company relying more on wholesale market purchases and higher cost thermal generation. Thirdly, temperatures in July 2006 were considerably higher than normal throughout the

	calculation of the deferral amount?
Q.	Did the Parties agree to any key principles or methodologies to govern the
	Power should not recover costs associated with load growth.
	high temperatures in July 2006. The parties have also agreed, however, that Idaho
	through March 2007, and the increase in purchased power costs resulting from the
	predictions for drought, the lower-than-expected streamflows from October 2006
	variable power costs associated with power purchases based on the early
	parties have agreed that Idaho Power should be allowed to recover excess net
	anticipated prices, causing an overall increase to net power supply expenses. The
	the market to meet the higher-than-expected loads, it was also paying higher-than-
	result was that during a time when the Company was actively purchasing power from
	electric market prices. For a summer peaking utility, like Idaho Power Company, the
	region, causing an increase in electricity demand and a corresponding increase in

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- Yes. While the Parties used different methodologies, the Parties agreed to the 14 A. following key principles: 15
 - Actual net variable power expenses should be compared to base net variable power expenses to produce excess net power supply expenses;
 - Excess net power cost expenses incurred as a consequence of load growth should not be included in amounts to be deferred; and
 - Idaho Power's Oregon allocation factor of 4.94% from UE 167 is appropriate to apply to the system-wide excess net power supply expenses to produce the Oregon deferral amount.
- Based upon these principles, did the Parties agree upon a compromise? 23 Q.
- Yes. The Parties agreed that Idaho Power should be allowed to defer excess net 24 A. power supply expenses in the amount of \$2.0 million. This represents \$41.7 million 25 on a total company basis. 26

1	Q.	Does this compromise satisfy the Farties respective concerns:
2	A.	Yes.
3	Q.	Do the Parties agree that the excess net power supply expenses Idaho Power
4		incurred would have a substantial financial impact on the Company absent the
5		proposed deferral?
6	A.	Yes.
7		Stipulated Deferral Mechanism
8	Q.	Does the Stipulation resolve all of the issues arising from and relating to Idaho
9		Power's Application in this case?
10	A.	Yes.
11	Q.	Did the Parties reach agreement on the carrying charge to be applied to the
12		unamortized deferral balance?
13	A.	Yes. Beginning from the end of the deferral period, interest would accrue on the
14		deferred amount at Idaho Power's authorized rate of return. Upon a Commission
15		order authorizing amortization, interest would accrue on unamortized deferral
16		balances at the rate (or the rate determined by the methodology) determined by the
17		Commission in the third phase of UM 1147.
18	Q.	Were there any issues that were not resolved by the Stipulation?
19	A.	No.
20	Q.	Do all of the Parties recommend that the Commission accept their settlement
21		agreement as embodied in the Stipulation?
22	A.	Yes. The Parties believe that the settlement, viewed in its entirety, represents a
23		reasonable resolution of the issues, and that allowing Idaho Power to defer its
24		excess net power supply expenses incurred during the period between May 1, 2006
25		and April 30, 2007, in the manner described herein, would be a fair, just, and
26		reasonable result. As a result, it is the joint recommendation of the Parties that their

Staff/Idaho Power/CUB/100 Owings/Youngblood/Brown/5

- agreement, as embodied in the Stipulation, be accepted by the Commission without
- 2 change or condition.
- 3 Q. Does this conclude your testimony?
- 4 A. Yes.

CERTIFICATE OF SERVICE 1 I hereby certify that I served a true and correct copy of the foregoing document in 2 3 Docket UM 1261 on the following named person(s) on the date indicated below by email 4 and first-class mail addressed to said person(s) at his or her last-known address(es) 5 indicated below. 6 **OPUC Dockets** Stephanie S. Andrus Citizens' Utility Board of Oregon Department of Justice 7 Regulated Utility & Business Section 610 SW Broadway Ste 308 Portland, OR 97205 1162 Court St NE 8 Salem, OR 97301-4096 dockets@oregoncub.org stephanie.andrus@state.or.us 9 DATED: October 24, 2007. 10 L. McLodov 11 12 Wendy L. McIndoo Legal Assistant 13 14 15 16 17 18 19 20 21 22 23 24 25 26