

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 384

In the Matter of

IDAHO POWER COMPANY,

2021 Annual Power Cost Update.

ORDER

DISPOSITION: STIPULATION ADOPTED

**I. SUMMARY**

In this order, we adopt the parties' stipulated agreement in Idaho Power Company's 2021 Annual Power Cost Update (APCU). The APCU is Idaho Power's annual filing to update its net power supply expense included in rates. We adopt the stipulation between Idaho Power, Oregon Citizens' Utility Board (CUB), and Staff of the Public Utility Commission of Oregon, which provides an Oregon jurisdictional increase in Idaho Power's revenue requirement of \$2.36 million or 4.37 percent overall. The stipulation is attached to this order as Appendix A.

**II. BACKGROUND**

Pursuant to the APCU, Idaho Power files an October update and a March forecast. The October update provides calculations for Idaho Power's net power supply expense based on an April through March test period. The March forecast updates certain components of the forecasted power costs over the same test period. Idaho Power adjusts base rates to reflect changes in revenue requirement related to the October update,<sup>1</sup> while the rates resulting from the March forecast are listed on Schedule 55. The rates associated with both updates are intended to become effective on June 1 of each year.

**III. PARTIES' FILINGS**

Idaho Power's October update resulted in a cost of \$26.83 per MWh, representing an increase of approximately 7.2 percent compared to last year's filing of \$25.02 per MWh. In this proceeding Staff and CUB both filed testimony addressing the October update and we summarize Idaho Power's responses.

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<sup>1</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/2 (citing Order No. 10-191).

Both Staff and CUB raised issues with Idaho Power's estimated Energy Imbalance Market (EIM) benefits. Initially, Idaho Power estimated EIM benefits based on the California Independent System Operator (CAISO) report of EIM benefits adjusted for Idaho Power's participation. CUB raised a concern over how Idaho Power removed 7 percent of the EIM benefits as attributable to third-party loads in Idaho Power's BAA. Idaho Power agreed that there was no third-party dispatchable generation located in its BAA participating in the EIM, and that Idaho Power does not have dispatch cost information for the nonparticipating generators that are settled in the EIM to quantify incremental production cost savings achieved by those entities. Idaho Power removed the 7 percent EIM deduction that it had applied to the EIM benefit forecast.<sup>2</sup>

Both Staff and CUB raised issues regarding Idaho Power's market repricing methodology. As provided in the original APCU order,<sup>3</sup> Idaho Power applies repricing adjustments to electric prices that are the output of its AURORA model. CUB acknowledged that the re-pricing percentages are listed in the 2008 stipulation, but asserted that the prescribed percentages could be reconsidered in future filings. Idaho Power agreed it is reasonable to evaluate in the future whether the percentages continue to be valid. Idaho Power proposed relying on the forward prices without any adjustments. Idaho Power also proposed updating its percentages of Mid-Columbia peak and off-peak purchases and sales so that the percentages are based on actual volumes over the last four years, and not volumes from 2003 to 2007.<sup>4</sup>

CUB identified several concerns regarding fuel costs at the Jim Bridger plant, including incentives and management overtime. CUB explained a 2013 PacifiCorp order that required PacifiCorp to remove 50 percent of annual incentive plan bonuses from rates, and Idaho Power agreed to remove those amounts.<sup>5</sup> Idaho Power did not remove its management overtime because those costs reflect expected compensation at the prevailing hourly rate.

CUB raised an issue with Idaho Power's partner dispatch sales from the North Valmy power plant. A prior stipulation sets a 3 year average of partner dispatch to calculate an offset or charge for power costs. Idaho Power proposed an adjustment for the partner dispatch in 2019 because of its exit from Valmy Unit 1, but CUB maintained that NV Energy's use of Idaho Power's unused capacity had increased in recent years and that NV Energy will have an even greater need to use Idaho Power's unused capacity as a result of the retirement of Unit 1. Idaho Power agreed that its exit from Unit 1 did not seem to

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<sup>2</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/5.

<sup>3</sup> *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).

<sup>4</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/6.

<sup>5</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/7.

impact NV Energy's use of Idaho Power's unused capacity at Valmy and removed the 2019 adjustment.<sup>6</sup>

Idaho Power's March forecast resulted in a cost of \$30.99 per MWh, representing an increase compared to last year's filing of \$27.43 per MWh. The overall impact of the combined 2021 October update and March forecast is an increase of \$2.36 million or 4.37 percent and a combined rate of \$30.75 per MWh.<sup>7</sup> This reflects an increase of \$0.8 million in base rate revenues associated with the October update, and a \$1.56 million increase in Schedule 55 revenues associated with the March forecast.<sup>8</sup>

Staff filed reply and cross-answering testimony. The parties held 3 settlement conferences and continued discussions over email. Ultimately, the parties resolved all the issues in this case through their discussions, resulting in the stipulation and joint testimony.

The stipulation describes the parties' agreement to a revenue requirement increase of \$2.36 million or 4.37 percent overall, which is based on Idaho Power's March forecast filing. The stipulation includes a provision for Idaho Power to hold a workshop no later than September 20, 2021, to address hydro forecasting included in the APCU and to cover the hydro forecasting questions listed in the stipulation.<sup>9</sup> The stipulation describes key cost drivers for Idaho Power's net power costs including the cost of generation at the two coal plants Idaho Power shares ownership in, the level of the hydro forecast, the cost of natural gas, and the level and cost of existing and new Public Utility Regulatory Policies Act (PURPA) generation.

The stipulating parties find their agreement conforms to the Commission's methodology set in previous APCU stipulations and orders. The stipulating parties agree that rates should be made effective on June 1, 2021, as permitted by the APCU mechanism. Idaho Power commits to file revised tariff sheets as a compliance filing in this docket to reflect the stipulation.

Staff and CUB support the stipulation because the parties' discovery, workshops, testimony and settlement discussions allowed for all pertinent issues and points of view to be appropriately addressed. Staff and CUB state that Idaho Power's responses to issues were supported and reasonable. Idaho Power performed requested adjustments related to EIM, Valmy, Bridger, and market repricing. In other instances, Idaho Power provided analysis and reasonable explanation to justify its process. Staff and CUB request that we approve the stipulation.<sup>10</sup>

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<sup>6</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/8.

<sup>7</sup> Stipulation at 8.

<sup>8</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/9.

<sup>9</sup> Stipulation at 8.

<sup>10</sup> Stipulating Parties/100, Gibbens, Blackwell, Mullins/13.

**IV. DISCUSSION**

We adopt the stipulation in its entirety. The parties agree that Idaho Power's 2021 APCU results in a revenue requirement increase of \$2.36 million or 4.37 percent. Idaho Power made several adjustments requested by Staff and CUB and all parties support the stipulation as reasonable. We approve the stipulation and the find the revenue requirement increase will result in just and reasonable rates. We will allow an effective date of June 1, 2021, pending Idaho Power's tariff compliance filings.

**V. ORDER**

IT IS ORDERED that:

1. The Stipulation between Idaho Power Company, Staff of the Public Utility Commission of Oregon, and the Oregon Citizens' Utility Board, attached as Appendix A, is adopted.
2. Idaho Power Company shall make tariff compliance filings as described in the Stipulation.

May 27 2021

Made, entered, and effective \_\_\_\_\_.




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**Megan W. Decker**  
Chair




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**Letha Tawney**  
Commissioner




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**Mark R. Thompson**  
Commissioner



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Court of Appeals in compliance with ORS 183.480 through 183.484.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UE 384**

In the Matter of  
**IDAHO POWER COMPANY**  
**2021 ANNUAL POWER COST UPDATE**

## STIPULATION

1 This Stipulation resolves all issues among the parties to Idaho Power Company's  
2 ("Idaho Power" or "Company") 2021 Annual Power Cost Update ("APCU") filed pursuant to  
3 Order No. 08-238.<sup>1</sup> The APCU updates the Company's net power supply expense ("NPSE")  
4 and results in new rates, which the mechanism permits to go into effect June 1, 2021.

## PARTIES

6           1. The parties to this Stipulation are Staff of the Public Utility Commission of  
7           Oregon ("Staff"), the Oregon Citizens' Utility Board ("CUB"), and Idaho Power (together, the  
8           "Stipulating Parties").

## BACKGROUND

10           2. Pursuant to Order No. 08-238, Idaho Power annually updates its NPSE included  
11        in rates through an automatic adjustment clause, the APCU. The APCU is comprised of two  
12        components—an “October Update” and a “March Forecast.” The October Update  
13        establishes the prospective base or normalized level of NPSE for an April through March test  
14        period. The March Forecast contains the Company’s forecast of expected NPSE over the  
15        same test period. Pursuant to Order No. 10-191 the Company adjusts base rates to reflect  
16        changes in revenue requirement related to the October Update, while the rates resulting from  
17        the March Forecast are listed on Schedule 55. The rates associated with the October Update

<sup>1</sup> *Re 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 and the March Forecast are intended, under the mechanisms, to become effective on June  
2 1 of each year.

3           3. On October 30, 2020, Idaho Power filed testimony and exhibits for the 2021  
4 October Update component of the APCU ("2021 October Update").<sup>2</sup> Pursuant to Order  
5 No. 08-238, Idaho Power reviewed all the inputs and provided changes in the 2021 October  
6 Update for the following variables: (1) fuel prices and transportation costs, (2) wheeling  
7 expenses, (3) planned outages and forced outage rates, (4) heat rates, (5) forecast of  
8 normalized load and normalized sales, (6) contracts for wholesale power and power  
9 purchases and sales, (7) forward price curve, (8) Public Utility Regulatory Policies Act of  
10 1978 ("PURPA") expenses, and (9) the Oregon state allocation factor.<sup>3</sup>

11           4. The test period for the 2021 October Update was April 2021 through March  
12 2022 and included updates to the above-referenced variables for all Company-owned  
13 resources and updated sales and load forecasts.<sup>4</sup> The 2021 October Update specifically  
14 accounted for changes in coal and natural gas prices, generation and expenses related to  
15 contracts entered into pursuant to PURPA, and normalized system load.<sup>5</sup>

16           5. As part of the fuel expense update, the Company updated its forecast of Oil,  
17 Handling, and Administrative and General ("OHAG") expenses in accordance with the terms  
18 of the 2016 and 2017 APCU settlement stipulations.<sup>6</sup> Per the terms of the 2016 APCU  
19 settlement stipulation,<sup>7</sup> the per unit OHAG expense included in the AURORA model was  
20 updated to reflect the amount of OHAG expense driven by Idaho Power's dispatch of each

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<sup>2</sup> See Idaho Power/100-110.

<sup>3</sup> Idaho Power/100, Blackwell/5.

<sup>4</sup> Idaho Power/100, Blackwell/5.

<sup>5</sup> Idaho Power/100, Blackwell/5-11.

<sup>6</sup> Idaho Power/100, Blackwell/6-7.

<sup>7</sup> *Re Idaho Power Company's 2016 Annual Power Cost Update*, Docket No. UE 301, Stipulation at 7 (May 11, 2016).

1 of its coal plants. The Company then separately accounted for its proportional share of the  
2 total OHAG expense incurred at each of its coal plants. Per the terms of the 2017 APCU  
3 settlement stipulation,<sup>8</sup> Idaho Power's proportional share of total OHAG expenses incurred  
4 at each of its coal plants was forecast using the three-year historical average of actual OHAG  
5 costs, with a growth (reduction) rate equal to the five-year historical average growth  
6 (reduction) rate. Idaho Power also accounted for revenues received from or expenses paid  
7 to NV Energy (its ownership partner in the North Valmy Plant ("Valmy")) for use of the  
8 Company's unused capacity or the Company's use of NV Energy's unused capacity.

9 6. The 2021 October Update also included the Company's estimate of incremental  
10 costs and benefits associated with participation in the Western Energy Imbalance Market  
11 ("EIM").<sup>9</sup> Idaho Power proposed to include \$14.6 million in system EIM benefits as an offset  
12 to NPSE in the 2021 October Update.<sup>10</sup> Idaho Power determined that level of benefit by  
13 using the California Independent System Operator ("CAISO") report of EIM benefits, for  
14 August 2019 through July 2020, as a starting point, and then accounted for necessary  
15 adjustments to quantify ongoing cost-savings benefits specific to Idaho Power's participation  
16 in the EIM. The 2021 October Update also included Oregon-allocated EIM costs of  
17 \$146,504.

18 7. The filed 2021 October Update resulted in a rate of \$26.83 per megawatt-hour  
19 ("MWh"), representing an increase of approximately 7.2 percent relative to last year's  
20 October Update rate of \$25.02 per MWh.<sup>11</sup>

21 8. For the 2021 October Update, the Company calculated the Oregon jurisdictional  
22 share of total NPSE by multiplying the rate of \$26.83 per MWh by the forecasted Oregon

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<sup>8</sup> *Re Idaho Power Company's 2017 Annual Power Cost Update*, Docket No. UE 314, Stipulation at 7 (April 28, 2017).

<sup>9</sup> Idaho Power/100, Blackwell/14-21.

<sup>10</sup> Idaho Power/100, Blackwell/15.

<sup>11</sup> Idaho Power/100, Blackwell/22.

1 jurisdictional loss-adjusted normalized sales for the April through March test period.<sup>12</sup> Idaho  
2 Power then calculated the incremental Oregon jurisdictional NPSE by comparing the 2021  
3 October Update Oregon jurisdictional share of total NPSE to the NPSE recovery under  
4 current approved rates from the 2020 APCU October Update, resulting in a revenue  
5 requirement increase of approximately \$1.2 million.<sup>13</sup>

6       9. The Company's revenue spread methodology for the 2021 October Update  
7 allocated the incremental revenue requirement to individual customer classes on the basis  
8 of normalized jurisdictional forecasted sales at the generation level for the test period,  
9 consistent with the stipulation from the 2018 APCU.<sup>14</sup> In addition, consistent with the  
10 stipulation from the 2018 APCU, any rate increases resulting from application of this revenue  
11 spread methodology as applied to a customer class was capped at 3 percent above the  
12 overall average rate increase on a percentage of total revenue basis. In the 2021 October  
13 Update, the overall average rate change as a percentage of total revenue is an increase of  
14 2.37 percent; therefore, any rate increases applied to individual customer classes was  
15 capped at 5.37 percent. Application of the stipulated revenue spread methodology resulted  
16 in rate increases for all customer classes that were less than 5.37 percent, so no adjustments  
17 were necessary to comply with the cap.

18       10. On November 9, 2020, CUB filed its Notice of Intervention. On December 30,  
19 2020, Idaho Power filed a motion to adopt a procedural schedule that would allow the Public  
20 Utility Commission of Oregon ("Commission") to issue an order on Idaho Power's 2021 APCU  
21 prior to June 1, 2021.<sup>15</sup> Administrative Law Judge ("ALJ") Allan J. Arlow granted that motion.

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<sup>12</sup> Idaho Power/100, Blackwell/24.

<sup>13</sup> Idaho Power/100, Blackwell/25.

<sup>14</sup> Idaho Power/100, Blackwell/25-26; Idaho Power/109.

<sup>15</sup> *Re Idaho Power Company 2021 Annual Power Cost Update*, Docket No. UE 384, Ruling Conditionally Adopting Procedural Schedule at 1 (December 30, 2020).

1           11. On January 29, 2021, Staff filed Opening Testimony. Staff's testimony  
2 addressed the Company's estimated EIM benefits; Idaho Power's compliance with previous  
3 Commission orders regarding rate spread; Staff's review of the load forecast, natural gas  
4 price forecast update, and other general updates; the AURORA model's forward market re-  
5 pricing; and the Company's forecast of PURPA costs.

6           12. CUB also filed Opening Testimony on January 29, 2021. CUB's testimony  
7 addressed the Company's estimated EIM benefits; the Company's compliance with previous  
8 orders regarding the market price repricing methodology; factors included in the Company's  
9 estimated Jim Bridger ("Bridger") plant fuel costs; and Idaho Power's partner dispatch sales  
10 from the Valmy plant.

11           13. Staff filed Reply and Cross-Answering Testimony on February 26, 2021.

12           14. On February 26, 2021, Idaho Power filed Reply Testimony.

13           15. On March 26, 2021, Idaho Power filed the 2021 March Forecast component of  
14 the APCU ("2021 March Forecast"). The 2021 March Forecast consisted of direct testimony  
15 describing the Company's estimate of the expected NPSE for the upcoming water year—  
16 April 2021 through March 2022.<sup>16</sup> Order No. 08-238 calls for the March Forecast to update  
17 the following variables: fuel prices, transportation costs, wheeling expenses, planned and  
18 forced outages, heat rates, forecast of normalized sales and loads updated for significant  
19 changes since the October Update, forecast hydro generation, wholesale power purchase  
20 and sale contracts, forward price curve, PURPA expenses, and the Oregon state allocation  
21 factor.

22           16. Idaho Power reviewed all the variables for the March Forecast and the following  
23 variables changed since the 2021 October Update: (1) fuel prices and transportation costs;  
24 (2) forced outage rates; (3) heat rates; (4) forecast of normalized sales and load; (5) forecast  
25 of hydro generation from stream flow conditions using the most recent water supply forecast

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<sup>16</sup> Idaho Power/300.

1 from the Northwest River Forecast Center (“NWRFC”) and current reservoir levels; (6) known  
2 power purchases and surplus sales made in compliance with the Company’s Energy Risk  
3 Management Policy (“ERMP”); (7) forward price curve; and (8) PURPA contract expenses.<sup>17</sup>

4 17. The fuel prices were updated to reflect changes in forecast natural gas and coal  
5 costs.<sup>18</sup> At the plant level, the per-unit cost of production decreased at the Bridger plant from  
6 \$35.24 per MWh to \$35.10 per MWh and increased at the Valmy plant from \$45.45 per MWh  
7 to \$62.05 per MWh.<sup>19</sup>

8 18. The gas price forecast used for the March Forecast for Henry Hub was \$2.88  
9 per MMBtu, which is the same Henry Hub gas price used for the October Update.<sup>20</sup>

10 19. The Company also updated the hydro forecast.<sup>21</sup> The hydro generation  
11 forecasted for this year’s March Forecast is 7.0 million MWh compared to 7.2 million MWh in  
12 last year’s March Forecast, a 3 percent decrease.<sup>22</sup>

13 20. The March Forecast also included reduced PURPA generation relative to the  
14 October Update. The October Update included 348 average megawatts (“aMW”) of available  
15 PURPA generation, whereas the PURPA generation included in the March Forecast was 345  
16 aMW, a decrease of 3 aMW, or less than 1 percent, since the October Update.<sup>23</sup> Total  
17 PURPA expense included in the March Forecast is \$229.4 million compared to \$231.2 million  
18 included in the October Update, a decrease of \$1.8 million, or less than 1 percent. PURPA  
19 expense included in the 2021 March Forecast is \$11.3 million more than PURPA expense

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<sup>17</sup> Idaho Power/300, Blackwell/5-6.

<sup>18</sup> Idaho Power/300, Blackwell/6-12.

<sup>19</sup> Idaho Power/300, Blackwell/6.

<sup>20</sup> Idaho Power/300, Blackwell/10.

<sup>21</sup> Idaho Power/300, Blackwell/15-16.

<sup>22</sup> Idaho Power/300, Blackwell/16.

<sup>23</sup> Idaho Power/300, Blackwell/12-13.

1 included in the 2020 March Forecast,<sup>24</sup> an increase that is primarily related to increased  
2 generation estimates and updated PURPA contract values for existing contracts.

3 21. Idaho Power is proposing to include \$18.9 million in system EIM benefits as an  
4 offset to NPSE in the 2021 APCU. On an Oregon allocated basis, the EIM benefits to be  
5 included in the 2021 APCU total \$869,745.<sup>25</sup>

6 22. Idaho Power's 2021 March Forecast also incorporated certain adjustments  
7 proposed by CUB in its Opening Testimony.

8 23. The 2021 March Forecast included forecast NPSE of \$467.6 million, or \$55.8  
9 million more than the 2020 March Forecast of NPSE of \$411.8 million.<sup>26</sup> The 2020 March  
10 Forecast unit cost per MWh was \$27.43 per MWh, compared to this year's March Forecast  
11 unit cost of \$30.99 per MWh.<sup>27</sup> The overall revenue impact of the combined 2021 October  
12 Update and March Forecast is an increase of \$2.36 million or 4.37 percent overall.<sup>28</sup> The  
13 \$2.36 million increase reflects an increase of \$0.8 million in base rate revenues associated  
14 with the October Update and a \$1.56 million increase in Schedule 55 revenues associated  
15 with the March Forecast, as compared to what is currently included in Oregon customers'  
16 rates related to the 2020 APCU.

17 24. Staff and CUB conducted a thorough investigation of the March Forecast.

18 25. Settlement conferences were held on February 18, 2021, March 10, 2021, and  
19 March 31, 2021. The parties continued settlement discussions via email communications  
20 during the week of April 5, 2021. Ultimately the Stipulating Parties resolved all the issues in  
21 this case through these discussions, resulting in the settlement stipulation as described in  
22 this Agreement.

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<sup>24</sup> Idaho Power/300, Blackwell/13.

<sup>25</sup> Idaho Power/300, Blackwell/24.

<sup>26</sup> Idaho Power/300, Blackwell/21.

<sup>27</sup> Idaho Power/300, Blackwell/27.

<sup>28</sup> Idaho Power/300, Blackwell/30.

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**AGREEMENT**

2           26. The Stipulating Parties agree to a revenue requirement increase of \$2.36 million  
3       or 4.37 percent overall. The Stipulating Parties agree that the Combined Rate of  
4       \$30.75/MWh is reasonable. The Stipulating Parties agree that the Company's allocation  
5       methodology conforms to Commission precedent, as reflected in previous APCU  
6       stipulations, and should be approved. The Stipulating Parties agree that the rate change  
7       resulting from the Stipulation results in rates that are fair, just, and reasonable, as required  
8       by ORS 756.040.

9           27. The Stipulating Parties agree that rates agreed to by the terms of this Stipulation  
10      should be made effective on June 1, 2021, as permitted by the APCU mechanism.

11          28. Idaho Power agrees to hold a workshop with interested parties prior to filing the  
12      2022 APCU to address hydro forecasting. Idaho Power agrees to hold that workshop no  
13      later than September 30, 2021. The Stipulating Parties agree to work collaboratively to  
14      determine the scope and issues addressed in that workshop; topics will include but are not  
15      limited to:

- 16           • How the Company verifies the forecast provided by the Northwest River Forecast  
17          Center (NRFC)?
- 19           • How the hydro forecast utilized in the March Forecast has compared to actuals in  
20          recent years?
- 22           • How the Company utilizes the hydro forecast to plan and model their hydro  
23          production in the APCU and operations?

24          29. The Stipulating Parties agree the result of this Stipulation is in conformance with  
25      the methodology adopted by the Commission in Order No. 08-238, as modified in subsequent  
26      APCU orders.

27          30. The Stipulating Parties agree to submit this Stipulation to the Commission and  
28      request that the Commission approve the Stipulation as presented.

1           31. This Stipulation will be offered into the record of this proceeding as evidence  
2 pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation  
3 throughout this proceeding and any appeal, (if necessary) provide witnesses to sponsor this  
4 Stipulation at the hearing and recommend that the Commission issue an order adopting the  
5 settlements contained herein.

6           32. If this Stipulation is challenged, the Stipulating Parties agree that they will  
7 continue to support the Commission's adoption of the terms of this Stipulation. The  
8 Stipulating Parties agree to cooperate in cross-examination and put on such a case as they  
9 deem appropriate to respond fully to the issues presented, which may include raising issues  
10 that are incorporated in the settlements embodied in this Stipulation.

11          33. The Stipulating Parties have negotiated this Stipulation as an integrated  
12 document. If the Commission rejects all or any material part of this Stipulation, or adds any  
13 material condition to any final order that is not consistent with this Stipulation, each  
14 Stipulating Party reserves its right, pursuant to OAR 860-001-0350(9), to present evidence  
15 and argument on the record in support of the Stipulation or to withdraw from the Stipulation.  
16 Stipulating Parties shall be entitled to seek rehearing or reconsideration pursuant to OAR  
17 860-001-0720 in any manner that is consistent with the agreement embodied in this  
18 Stipulation.

19          34. By entering into this Stipulation, no Stipulating Party shall be deemed to have  
20 approved, admitted, or consented to the facts, principles, methods, or theories employed by  
21 any other Stipulating Party in arriving at the terms of this Stipulation, other than those  
22 specifically identified in the body of this Stipulation. No Stipulating Party shall be deemed to  
23 have agreed that any provision of this Stipulation is appropriate for resolving issues in any  
24 other proceeding, except as specifically identified in this Stipulation.

25          35. This Stipulation may be executed in counterparts and each signed counterpart  
26 shall constitute an original document.

1           36. This Stipulation is entered into by each Stipulating Party on the date entered  
2 below such Stipulating Party's signature.

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**STAFF**

By: /s/ Sommer Moser

Date: 4/21/21

**IDAHO POWER**

By: \_\_\_\_\_

Date: \_\_\_\_\_

**OREGON CITIZENS' UTILITY BOARD**

By: \_\_\_\_\_

Date: \_\_\_\_\_

1           36. This Stipulation is entered into by each Stipulating Party on the date entered  
2       below such Stipulating Party's signature.  
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**STAFF**

By: \_\_\_\_\_

Date: \_\_\_\_\_

**IDAHO POWER**

By:  \_\_\_\_\_

Date: 4/21/2021

**OREGON CITIZENS' UTILITY BOARD**

By: \_\_\_\_\_

Date: \_\_\_\_\_

1           36. This Stipulation is entered into by each Stipulating Party on the date entered  
2 below such Stipulating Party's signature.  
3

**STAFF**

By: \_\_\_\_\_

Date: \_\_\_\_\_

**IDAHO POWER**

By: \_\_\_\_\_

Date: \_\_\_\_\_

**OREGON CITIZENS' UTILITY BOARD**

  
By: \_\_\_\_\_

Date: 4/21/21