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UTILITIES COMMISSION

LISA D. NORDSTROM  
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February 20, 2020

**VIA HAND DELIVERY**

Diane Hanian, Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Boulevard  
Building 8, Suite 201-A  
Boise, Idaho 83714

Re: Case No. IPC-E-18-16  
Study of Fixed Costs of Providing Electric Service to Customers  
Idaho Power Company's Reply Comments

Dear Ms. Hanian:

Enclosed for filing in the above matter please find an original and seven (7) copies of Idaho Power Company's Reply Comments. If you have any questions about the enclosed documents, please do not hesitate to contact me.

Very truly yours,



Lisa D. Nordstrom

LDN:kkt

Enclosures

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Attorney for Idaho Power Company

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION	)	CASE NO. IPC-E-18-16
OF IDAHO POWER COMPANY TO	)	
STUDY FIXED COSTS OF PROVIDING	)	IDAHO POWER COMPANY'S
ELECTRIC SERVICE TO CUSTOMERS	)	REPLY COMMENTS
_____	)	

The Fixed Cost Report (“Fixed Cost Report” or “Report”) filed on September 30, 2019, by Idaho Power Company (“Idaho Power” or “Company”) complies with the Idaho Public Utilities Commission’s (“Commission”) directive to “file a study with the Commission exploring fixed-cost recovery in basic charges and other rate design options prior to its next general rate case.”<sup>1</sup> The Company met with interested parties over multiple workshops, gathering input on the scope, and suggested modifications to cost of service and potential rate designs to be incorporated within the Report. Idaho Power requests the Commission accept its Report in satisfaction of the Commission’s directive in Order No. 34046.

<sup>1</sup> Case No. IPC-E-17-13, Order No. 34046 at 31.

In these Reply Comments, the Company will respond to Comments submitted by Commission Staff ("Staff"), the City of Boise, Idaho Clean Energy Association, Inc. ("ICEA"), the Idaho Conservation League, Northwest Energy Coalition and Vote Solar (collectively referred to as "ICL"), Idaho Irrigation Pumpers Association, Inc. ("IIPA") and Idaho Sierra Club ("Sierra Club") (collectively, "Parties"). To better address the overall themes in the Parties' Comments, Idaho Power does not individually address all the Parties' arguments within this reply.

## **I. INTRODUCTION**

In Case No. IPC-E-17-13, the Company stated that its existing net metering rate structure creates inequity between standard service customers and net metering customers because net metering customers decrease some or all of their net usage while still relying on the Company's grid to purchase and transfer electricity.<sup>2</sup> At the conclusion of this case, the Commission found that "there is great diversity within the current R&SGS classes and, again, other potential groups (such as cabin owners and other low-use customers or EE adopters) may not be paying their fair share of fixed costs being recovered through the variable rate" and ordered Idaho Power "to undertake a comprehensive customer fixed-cost analysis to determine the proper methodology and

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<sup>2</sup> "Idaho Power currently bills its R&SGS customers two types of charges: (1) a flat monthly service charge of \$5.00 and (2) per kWh energy charges that vary by season and total monthly consumption. Due to the limited billing components associated with these rate classes, most of the Company's revenue requirement is collected through volumetric energy rates. This includes costs associated with the components of the electrical system, from investment in generation resources to the meters installed on customers' premises. Consequently, energy rates for R&SGS customers reflect not only the energy-related components of the revenue requirement, but fixed associated with generation, transmission, and distribution as well. For this type of rate design, recovery of fixed costs from an individual declines with any reduction in net energy use." Case No. IPC-E-17-13, Application at 5.



'spread' of fixed costs as they relate to the Company's customers."<sup>3</sup> The Commission's ultimate directive to the Company was as follows:

IT IS FURTHER ORDERED that Idaho Power shall file a study with the Commission exploring fixed-cost recovery in basic charges and other rate design options prior to its next general rate case.<sup>4</sup>

The Report satisfies the Commission's directive for the Company to evaluate the spread of fixed costs (comprehensively presented as the class cost of service study) and explore fixed-cost recovery in basic charges and other rate design options as detailed in Section II. As described in Section III below, the Company solicited feedback from Parties and meaningfully incorporated that input into the Report. And in Section IV, the Company asserts no additional process is necessary for the Commission to find the filed Report has satisfied the directive contained within Order No. 34046.

## **II. THE FIXED COST REPORT SATISFIES THE COMMISSION'S DIRECTIVE**

### **A. The Fixed Cost Report Evaluated Fixed-Cost Methodology and "Spread" for Each Customer Class Through Cost of Service.**

In order to fulfill the Commission's directive to "undertake a comprehensive fixed-cost analysis to determine the proper methodology and 'spread' of fixed costs as it relates to the Company's customers,"<sup>5</sup> the Company initially developed a class cost of service study based on a 2017 test year ("2017 CCOS Study") to serve as a starting point for

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<sup>3</sup> Order No. 34046 at 17 and 23.

<sup>4</sup> *Id.* at 31.

<sup>5</sup> *Id.* at 23.



discussions with Parties. The 2017 CCOS Study was developed using a methodology consistent with the most recently-approved cost of service methodology.<sup>6</sup>

As more fully explained in the Report,<sup>7</sup> three parties suggested modifications to certain aspects of the Commission-approved method be developed for discussion purposes. Parties presented their recommendations and the rationale for each modification during the workshops, and as such, the Company developed new cost of service studies incorporating suggested changes. Not only did the Company present the results of these analyses at a workshop with Parties, it also incorporated CCOS Scenario Nos. 1-3 into the Report, providing figures quantifying and presenting the cost shift between customer classes and demonstrating how these adjustments in class cost of service affect the Company's customers (i.e., shifting costs from variable to fixed). The scenarios that were included on pages 16-23 of the Report include the following:

- CCOS Scenario No. 1: One party suggested four changes to the existing class cost of service methodology, identified as "Scenario No. 1" on pages 16-19 of the Report. The most significant of the four changes led to the development of a replacement methodology for the existing 12 monthly coincident peak method in an effort to assign base-load production plant with an "above average load" methodology. This modification required an evaluation of each hour of the test year (by rate class) and resulted in allocating base-load production costs to only those hours where consumption exceeded the annual average.

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<sup>6</sup> The Company's most recent Commission-approved cost of service methodology occurred in Case No. IPC-E-08-10. The most recent general rate case, Case No. IPC-E-11-08, was settled without discussion of the cost of service methodology.

<sup>7</sup> Fixed Cost Report at 16-23.

- CCOS Scenario No. 2: A second party also suggested four changes to the existing class cost of service methodology, identified as “Scenario No. 2” on pages 19-22 of the Report. The most significant revenue allocation impact to the class cost of service is the modification to classify distribution costs related to overhead and underground conduit, poles, underground conductors and devices, and line transformers as 100 percent demand, instead of classification between demand and customer.
- CCOS Scenario No. 3: A third party suggested the Company complete an analysis that focused on a more accounting-driven definition of fixed costs, identified as “Scenario No. 3” on pages 22-23 of the Report. The results of this analysis highlight the portion of energy classified costs based on the existing CCOS methodology which might be considered “fixed” under a strictly accounting definition.

An evaluation of the results of each of the three CCOS Scenarios demonstrates how changes to the CCOS methodology will impact the spread of fixed costs across the Company’s customer classes. The Commission ordered Idaho Power to explore fixed-cost collection through basic charges and other rate design options,<sup>8</sup> and a clear theme among all CCOS Scenarios was the mismatch between how costs are incurred and how costs are collected under the existing rate designs.

Idaho Power presented each classes’ revenue collection with cost classification on page 2 of the Report because it believes its the best way to set the stage for a discussion

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<sup>8</sup> “Idaho Power shall file a study with the Commission exploring fixed-cost recovery in basic charges and other rate design options . . . .” Order No. 34046 at 31.



on fixed-cost collection through basic charges and other rate design options as the Commission ordered. While some Parties disagree<sup>9</sup> with Idaho Power's method of presenting the results of its analyses, Idaho Power asserts that by providing the comparison of revenue collection with cost classification, the Company is meeting the Commission's directive to "determine the proper methodology and 'spread' of fixed costs as they relate to the Company's customers."<sup>10</sup> To omit this comparison results in the failure to communicate and understand the spread of fixed costs.

**B. The Company Appropriately Relied on CCOS as a Basis for Exploring the Collection of Fixed Costs Through Rate Design.**

In its Report, Idaho Power aptly utilizes cost of service as a basis for rate design consistent with that described by the National Association of Regulatory Utility Commissioners ("NARUC"):

Cost of service studies are among the basic tools of ratemaking. While opinions vary on the appropriate methodologies to be used to perform cost studies, few analysts seriously question the standard that service should be provided at cost.<sup>11</sup>

NARUC also points out that "non-cost concepts and principles often modify the cost of service standard, but it remains the primary criterion for the reasonableness of rates."<sup>12</sup>

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<sup>9</sup> ICEA's Comments at 3, "[a]lignment of rate components with cost classifications is not specified among the seventeen attributes by the collective parties in this docket for assessing a rate design . . . . The focus on improving alignment distracts from opportunities to address public interests." IIPA's Comments at 2, "it should be recognized that the 'alignment' of the its fixed charges (demand and customer) with its underlying classification of costs, may not be a goal that is worth pursuing." Sierra Club's Comments at 6, "by narrowly focusing on ways to improve the timing of recovery of costs associated with the Company's prior investments, the Report does not objectively or adequately evaluate rate designs that control future cost growth . . . ."

<sup>10</sup> Order No. 34046 at 23.

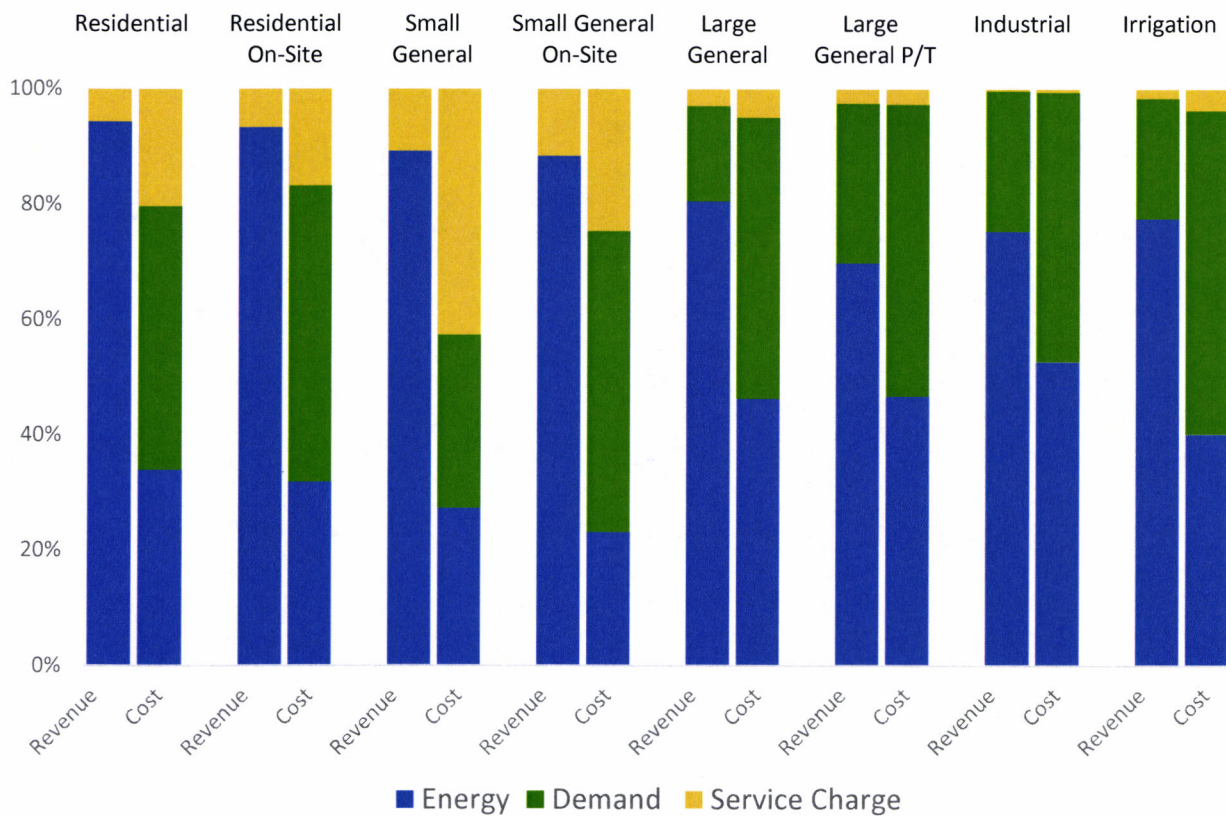
<sup>11</sup> The 1992 National Association of Regulatory Utility Commissioners Electric Utility Cost Allocation Manual ("NARUC Manual") at 12.

<sup>12</sup> *Id.*



The Company performed several analyses<sup>13</sup> on rate designs, meeting the Commission’s directive to “explor[e] fixed-cost recovery in base charges and other rate design options.”<sup>14</sup> To demonstrate the impact of modifying rate design, the Company’s initial rate design for each customer class (referred to as a “Base” rate design) was informed by the 2017 CCOS Study but mirrors the existing rate design for each class. Figure 1 below demonstrates the discrepancy between the revenue collection proportions with the 2017 CCOS Study informed cost classification proportions for each of the classes.<sup>15</sup>

**Figure 1 - Summary of 2017 CCOS results**



<sup>13</sup> Fixed Cost Report at 25 - 46.

<sup>14</sup> Order No. 34046 at 31.

<sup>15</sup> Fixed Cost Report at 15, Figure 8.

The Report utilizes the results of the 2017 CCOS Study to inform the effectiveness of each studied rate design and provides the results of each rate design explored for each customer class and gives different perspectives on possible modifications that may impact how the Company collects fixed costs. The Report also includes a bill impact analysis for each of the studied rate designs to give perspective on the impact to the Company's customers in moving from the current "base case" rate design, to the studied design.<sup>16</sup>

**C. The Company Did Not Propose Rate Design Changes in the Fixed Cost Report and Thus Did Not Quantify the Need for Them.**

In their comments, Staff stated: The Company did not provide sufficient evidence to support a change in rate design<sup>17</sup> and "[t]he Company proposes a number of rate design modifications . . . ."<sup>18</sup> Because the Company interpreted the Commission's directive as seeking to inform and educate the Commission on various fixed-cost collection methodologies and apportionment to customers through rate design, the Company did not make a recommendation to implement the rate designs discussed in the Report. Rather, the Company explained: "While this Report does not recommend the immediate implementation of any specific modified rate design options, a number of preferred rate design options are presented for future consideration."<sup>19</sup> Pursuant to the Commission's directive to "undertake a comprehensive fixed-cost analysis to determine the proper methodology and 'spread' of fixed costs as it relates to the Company's

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<sup>16</sup> Fixed Cost Report, Appendix I – N.

<sup>17</sup> Staff's Comments at 2.

<sup>18</sup> *Id.* at 20 (emphasis added).

<sup>19</sup> Fixed Cost Report at 3.



customers,”<sup>20</sup> the Company sees the study process as an exploratory exercise and would not be a prudent vehicle to discuss implementation of specific rate design changes.

Parties Comments<sup>21</sup> reference the Fixed Cost Adjustment (“FCA”) mechanism and/or suggest because the Company did not demonstrate it is under-recovering fixed costs, it did not meet the Commission’s directive in Order No. 34046. As the Company has previously discussed:

The FCA mechanism is designed to allow the Company to recover the majority of the fixed costs of providing service to R&SGS service customers, regardless of the overall level of energy consumption per customer . . . . While it is correct to point out that the FCA largely mitigates any financial impact that net metering would otherwise have on Idaho Power, it is also important to recognize that the FCA facilitates annually any cost shifting that may exist between net metering customers and non-net metering R&SGS customers between GRCs.<sup>22</sup>

This type of revenue analysis is typically presented at the time a rate change is requested; because that is not the purpose of this docket, the Company has not included information regarding financial impacts to Idaho Power. The Company instead presented the class cost of service studies and rate design options for educational purposes within the Report, knowing these would be heavily litigated in a future rate proceeding.

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<sup>20</sup> Order No. 34046 at 23.

<sup>21</sup> Staff’s Comments at 10, “it is not possible for Staff to determine whether the FCA is allowing the Company to over-collect or under-collect the fixed costs embedded in the Commission authorized revenue requirement.” ICL’s Comments at 4, “Idaho Power fails to explain why the current rate design, coupled with the FCA, does not adequately provide the utility an opportunity to collect its authorized revenue requirement.” ICEA’s Comments at 2, “the Company has not demonstrated that it is unable to recover its fixed costs.” Sierra Club’s Comments at 7, “the Company has made no showing that they face any recovery deficiency . . . .”

<sup>22</sup> Case No. IPC-E-17-13, Tatum Rebuttal at 18.



### **III. IDAHO POWER MEANINGFULLY CONSIDERED PARTIES INPUT WHILE CREATING THE REPORT**

The Company included Parties' feedback within the Report and used workshop discussions as a framework of what should be considered within the Report. The Report incorporated Parties' feedback by including modified class cost of service studies, rate designs to be studied, and several of the attributes included on Attachment B to Staff's Report submitted on April 30, 2019 ("Staff's Report").<sup>23</sup>

#### **A. Idaho Power Incorporated Parties' Input on the Report Scope.**

The Commission instructed that "the Company, with input from interested parties, shall outline the scope of the study that should include exploring fixed-cost recovery in basic charges and other rate design options."<sup>24</sup> After the intervention period identified in Order No. 34190 passed, Idaho Power met with Parties to outline the scope of the Report; the input of Parties was memorialized as Attachments A and B to Staff's Report. Using this document as the foundation for analysis, Idaho Power ultimately developed a Report that is insightful but not exhaustive as to class cost of service and rate design options to collect its revenue requirement from customers.

#### **B. Idaho Power Incorporated Parties' Input on the Class Cost of Service.**

The Company appreciates Staff's acknowledgement of the Company's efforts as collaborative:

Staff also appreciates the Company's willingness to provide timely information, as well as thorough explanations of that information. Staff notes that the Company has actively

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<sup>23</sup> Staff's Report, Attachment B.

<sup>24</sup> Order No. 34046 at 23.

assisted individual intervenors by helping to model their proposals.<sup>25</sup>

To build on the aforementioned analysis and as more fully explained in Section II(A) of these Reply Comments, the Company incorporated all modifications suggested by Parties to the class cost of service study within the Report, dedicating pages 16–23 and Appendixes E–G to these different methodologies. Each of the Scenarios required adjustments performed outside of the cost of service study models and required significant time to complete.

**C. Idaho Power Incorporated Parties' Input on Specific Rate Designs to be Evaluated.**

Using the rate designs identified in Attachment A to Staff's Report as an initial foundation,<sup>26</sup> the Company evaluated each type of rate design with Bonbright's Ten Ratemaking Principles<sup>27</sup> in mind to determine which would ultimately be presented for consideration in the Report. The Company disagrees with Staff's characterization that "the Company either did not analyze or did not adequately analyze many of the rate designs proposed by Parties. Staff believes the Company should have conducted an objective and comprehensive analysis of all rate designs discussed . . . ."<sup>28</sup> Table 1 (which was included on page 25 of the Fixed Cost Report) reflects Idaho Power's high-level summary of rate designs considered and contains the Company's rationale for not

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<sup>25</sup> Staff's Report at 2.

<sup>26</sup> *Id.*, Attachment A.

<sup>27</sup> Fixed Cost Report at 8, Figure 2.

<sup>28</sup> Staff's Reply Comments at 2.



focusing on rate designs within the Report that are not well suited to address Idaho Power's present circumstances.

**Table 1 - Rate Designs Considered**

<b>Structure</b>	<b>Description</b>	<b>Included in Report?</b>
1. Single Rate Component	Collects each customer's required revenue through a single rate element: <ol style="list-style-type: none"> <li>a. Fixed monthly charge</li> <li>b. Demand charge</li> <li>c. Energy charge</li> <li>d. Connected load charge</li> </ol>	<u>No.</u> Relying on a single rate element for the collection of the class revenue requirement may improve revenue stability and fixed cost recovery (in the case of a fixed monthly charge or connected load charge) but does little to promote efficient utilization of the system (whether through reducing system peaks or overall energy efficiency) and is not supported by the cost of service study.
2. Seasonal Rates	Collects a higher proportion of revenue requirement in the months that are higher cost to serve.	<u>Yes.</u> In each of the rate designs studied, an emphasis was placed on aligning rates with the CCOS study -- this generally resulted in collecting additional costs in the summer months because serving customer demand is more costly in the summer-months than the non-summer months.
3. Time of Use (Energy)	Collects portions of the revenue requirement through energy charges that vary based on established time-periods.	<u>Yes.</u> TOU energy charges can be effective at sending a price signal to customers that their energy usage in an on-peak period may be more costly to serve, however it is important to recognize collecting fixed costs through a volumetric charge may impact the company's ability to ensure fixed cost recovery.
4. Demand Charges	Collects the demand-related portions of the revenue requirement through demand-type charges (e.g., billing demand, on-peak billing demand, or BLC).	<u>Yes.</u> Demand charges (both TOU and seasonal/monthly) were evaluated for all customer classes. Demand charges can send a price signal to customers that encourages a more efficient utilization of system capacity, however it is important to recognize collecting fixed costs through a volumetric charge may impact the company's ability to ensure fixed cost recovery.
5. Critical Peak Pricing (CPP) or Peak Rebates	CPP: Essentially a TOU rate on most days of the year, but when the utility system encounters critical conditions, the peak-period price rises to much higher, but known levels, typically on a day-ahead or day-of basis. Peak Rebates: Reward customers who reduce electricity consumption during periods of high-cost electricity with monetary rebates.	<u>No.</u> Idaho Power has previous experience with running a CPP pilot in 2005-2006; however in its 2017 IRP, no deficiency period is identified until 2026. Idaho Power also has the opportunity to leverage its existing demand response programs to manage peak if necessary.
6. Real Time Pricing	A rate design that provides customers with information about the actual cost of electricity at a given time.	<u>No.</u> Implementation of this type of rate design would likely require additional metering infrastructure and information systems, as well as enhancements or upgrades to the billing system.

The philosophy of the Report was not to overwhelm the reader by providing evaluation of all possible rate designs but rather focus on rate designs that educate readers on different ways to collect fixed costs. Incorporating select rate designs is consistent with the interested Parties' then-expectations presented in Staff's Report:

Given the large number of possible rate designs, parties understand that the Company intends to study a relatively



small number of base case designs, and then study how fixed cost recovery and other attributes are impacted by changes to those base case designs.<sup>29</sup>

It is practical and reasonable to exclude certain rate design analyses from within the Report, which add volume to the Report but do not necessarily provide valuable information.

**D. Idaho Power Incorporated Parties' Input on the Initial Draft of the Report.**

On August 9, 2019, Idaho Power provided a draft report to Parties, giving 30 days for Parties to review and submit written comments back to the Company. Parties were provided with the Company's underlying data, rate design workpapers, the 2017 CCOS Study, and class cost of service Scenario Nos. 1-3. The Company provided these to assist Parties in developing their own analyses, similar to that provided by Sierra Club on pages 16-20 of its comments.

Idaho Power hosted a fifth workshop to discuss feedback received from Parties on the draft Report. During this meeting, the Company walked through each comment received and responded to and addressed how the Company would incorporate the specific feedback into the report. Adjustments made to the Report, based on feedback received, include: expanded of the discussion on the FCA, a change in the original rate design for the 5:1 time-of-use studied rate for residential and small general service customers, an addition of low-income billing impact analysis, and a more robust overall billing impact discussion.

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<sup>29</sup> Staff's Report at 2.

Over the course of five workshops, Idaho Power obtained input from Parties which it used to develop the Report. Had the Company not incorporated input received from Parties, the Report submitted on September 30, 2019, would have been considerably different; Idaho Power believes its Report is stronger as a result of this feedback.

#### **IV. ADDITIONAL PROCESS TO STUDY FIXED COST AND RATE DESIGN IS UNNECESSARY**

The Company does not believe an additional study(s) will result in agreement among Parties. In its Comments, ICL requests that Staff lead a public process to produce future studies.<sup>30</sup> Class cost of service studies and rate design are always contested issues in general rate cases because Parties often weigh or value objectives and principles differently. This is not a new area for disagreement. In 1938, Douglas Joseph Bolton describes:

There has never been any lack of interest in the subject of electricity tariffs. Like all charges upon the consumer, they are an unending source of annoyance to those who pay, and of argument in those who levy them. In fact, so great is the heat aroused whenever they are discussed at institutions or in the technical press, that it has been suggested there should be a "close season" for tariff discussions. Nor does this interest exaggerate their importance. There is general agreement that appropriate tariffs are essential to any rapid development of electricity supply, and there is complete disagreement as to what constitutes an appropriate tariff.<sup>31</sup>

As evidenced by the comments filed in this case, there is no consensus on what constitutes an appropriate or fair cost of service method, rate design, or what a report should include. For example:

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<sup>30</sup> ICL's Comments at 2.

<sup>31</sup> Bolton, D. J., *Costs and Tariffs in Electricity Supply*, London (1938).

- Three parties proposed differing class cost of service methods<sup>32</sup> and several parties have made it clear they are not aligned with the prior Commission-adopted methodology.<sup>33</sup>
- Staff<sup>34</sup> and IIPA<sup>35</sup> have contradictory fixed-cost recovery solutions for the irrigation classes' rate design – both of which are different from the Company's studied design.
- After receiving the draft copy of the Report, a party asked the Company to expand its discussion about recovery from on-site generation customers. After the Company did so, the City of Boise commented that the Company “unfairly emphasizes on-site generation issues and related rate designs.”<sup>36</sup> The Company does not consider the Report's discussion to disproportionately address the on-site generation customer segment, but rather focused collectively on residential and small general service customers.<sup>37</sup>

When the Company proposes rate changes in a future case, it will present evidence as required by Rule of Procedure 121<sup>38</sup> and consistent with prior Commission policy,

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<sup>32</sup> Fixed Cost Report, Scenario Nos. 1-3 at 16-23.

<sup>33</sup> Sierra Club's Comments at 13-17.

<sup>34</sup> Staff's Comments at 19.

<sup>35</sup> IIPA's Comments at 9-10.

<sup>36</sup> “The Company's Fixed Cost Report places a heavy focus on certain customer classifications, such as residential on-site generation, over others.” City of Boise's Comments at 4.

<sup>37</sup> “The application of the current rate structure for residential and small general service customers results in between 90 and 95 percent of the total revenue collection coming through volumetric energy charges with fixed cost representing approximately 70 percent of the total cost to serve . . . the company believes that these two rate classes should receive the highest priority when considering rate design modifications.” Fixed Cost Report at 26.

<sup>38</sup> IDAPA 31.01.01.121.



orders or other directives. At that time Parties will have an opportunity, as allowed by Rule of Procedure 38,<sup>39</sup> to present their own experts, data, and analysis to support their respective positions. Ultimately, the Commission will make a determination as to what is fair, just, and reasonable under *Idaho Code* §§ 61-502 and – 503.

## V. CONCLUSION

As directed by the Commission, Idaho Power's Report filed on September 30, 2019, complied with Order No. 34046. The Report satisfies the Commission's directive for the Company to evaluate the spread of fixed costs (comprehensively presented as the class cost of service) and explore fixed-cost recovery in basic charges and other rate design options. Idaho Power solicited feedback from Parties and meaningfully incorporated that input into the Report. The Company maintains no additional process is necessary for the Commission to find the filed Report has satisfied the directive contained within Order No. 34046 and respectfully requests the Commission accept its Fixed Cost Report in satisfaction thereof.

Respectfully submitted this 20<sup>th</sup> day of February 2020.



LISA D. NORDSTROM  
Attorney for Idaho Power Company

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<sup>39</sup> IDAPA 31.01.01.38.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 20<sup>th</sup> day of February 2020 I served a true and correct copy of IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

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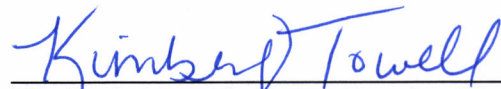
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