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LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

October 19, 2018

VIA HAND DELIVERY

Diane Hanian, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

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

Dear Ms. Hanian:

Enclosed for filing in the above matter please find an original and seven (7) copies of Idaho Power Company's Petition to Initiate Docket. 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

LISA D. NORDSTROM (ISB No. 5733)
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-5825
Facsimile: (208) 388-6936
Inordstrom@idahopower.com

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Attorney for Idaho Power Company

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 ELECTRIC) IDAHO POWER COMPANY'S
SERVICE TO CUSTOMERS) PETITION TO INITIATE DOCKET

COMES NOW, Idaho Power Company ("Idaho Power" or "Company"), and hereby petitions the Idaho Public Utilities Commission ("Commission") under Procedural Rule 53.03 to initiate a docket to facilitate stakeholder input on, and Idaho Power's subsequent filing of, a comprehensive customer fixed-cost analysis as envisioned by Order No. 34046. This Petition is based on the following:

I. PETITION TO INITIATE DOCKET

1. On May 9, 2018, the Commission issued Order No. 34046 in response to Idaho Power's Application for Authority to Establish New Schedules for Residential and Small General Service Customers with On-Site Generation in Case No. IPC-E-17-13.

The Commission found that “it is time for the Company to address fixed-cost apportionment across its system” and:

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.

Order No. 34046 at 17 and 31.

2. On page 23 of Order No. 34046, the Commission stated that it was “convinced” based upon evidence in the record of Case No. IPC-E-17-13 “that critical questions related to fixed costs must be addressed.” Due to the unclear timing of Idaho Power’s next general rate case, the Commission ordered the Company to undertake “a comprehensive customer fixed-cost analysis to determine the proper methodology and ‘spread’ of fixed costs as they relate to the Company’s customers.”

3. The Commission directed 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.” Order No. 34046 at 23.

4. Order No. 34046 indicated that “A status update shall be filed with the Commission on a quarterly basis, with more specific deadlines prescribed in the coming notice of application in that matter.” *Id.*

II. COMMUNICATIONS AND SERVICE OF PLEADINGS

5. Communications and service of pleadings with reference to this Petition should be sent to the following:

Lisa D. Nordstrom
Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
lnordstrom@idahopower.com
dockets@idahopower.com

Tim Tatum
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
ttatum@idahopower.com

III. CONCLUSION

Idaho Power respectfully requests the Commission initiate a docket and intervention period to facilitate stakeholder input on a comprehensive customer fixed-cost analysis performed by the Company as envisioned by Order No. 34046.

RESPECTFULLY SUBMITTED this 19th day of October, 2018.



LISA D. NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of October, 2018, I served a true and correct copy of IDAHO POWER COMPANY'S PETITION TO INITIATE DOCKET upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Sean Costello
Deputy Attorney General
Idaho Public Utilities Commission
472 West Washington (83702)
P.O. Box 83720
Boise, Idaho 83720-0074

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email sean.costello@puc.idaho.gov

Idahydro

C. Tom Arkoosh
ARKOOSH LAW OFFICES
802 West Bannock Street, Suite 900
P.O. Box 2900
Boise, Idaho 83701

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com

Idaho Conservation League

Matthew A. Nykiel
Idaho Conservation League
102 South Euclid #207
P.O. Box 2308
Sandpoint, Idaho 83864

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email mnykiel@idahoconservation.org

Benjamin J. Otto
Idaho Conservation League
710 North 6th Street
Boise, Idaho 83702

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email botto@idahoconservation.org

Idaho Irrigation Pumpers Association, Inc.

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
505 Pershing Avenue, Suite 100
P.O. Box 6119
Pocatello, Idaho 83205

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email elo@echohawk.com

Anthony Yankel
12700 Lake Avenue, Unit 2505
Lakewood, Ohio 44107

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email tony@yankel.net

Auric Solar, LLC

Preston N. Carter
Deborah E. Nelson
GIVENS PURSLEY LLP
601 West Bannock Street
Boise, Idaho 83702

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email prestoncarter@givenspursley.com
den@givenspursley.com

Elias Bishop
Auric Solar, LLC
2310 South 1300 West
West Valley City, Utah 84119

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email elias.bishop@auricsolar.com

Vote Solar

David Bender
Earthjustice
3916 Nakoma Road
Madison, Wisconsin 53711

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email dbender@earthjustice.org

Briana Kobor
Vote Solar
986 Princeton Avenue S
Salt Lake City, Utah 84105

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email briana@votesolar.org

City of Boise

Abigail R. Germaine
Deputy City Attorney
Boise City Attorney's Office
150 North Capitol Boulevard
P.O. Box 500
Boise, Idaho 83701-0500

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email agermaine@cityofboise.org

Idaho Clean Energy Association

Preston N. Carter
Deborah E. Nelson
GIVENS PURSLEY LLP
601 West Bannock Street
Boise, Idaho 83702

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email prestoncarter@givenspursley.com
den@givenspursley.com

Sierra Club

Kelsey Jae Nunez
KELSEY JAE NUNEZ LLC
920 North Clover Drive
Boise, Idaho 83703

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email kelsey@kelseyjaenunez.com

Tom Beach
Crossborder Energy
2560 9th Street, Suite 213A
Berkeley, California 94710

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email tomb@crossborderenergy.com

Zack Waterman
Director, Idaho Sierra Club
503 West Franklin Street
Boise, Idaho 83702

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email zack.waterman@sierraclub.org

Michael Heckler
3606 North Prospect Way
Garden City, Idaho 83714

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email michael.p.heckler@gmail.com

**Snake River Alliance
NW Energy Coalition**
John R. Hammond, Jr.
FISHER PUSCH LLP
101 South Capitol Boulevard, Suite 701
P.O. Box 1308
Boise, Idaho 83701

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email jrh@fisherpusch.com
wwilson@snakeriveralliance.org
diego@nwenergy.org

Intermountain Wind and Solar, LLC
Ryan B. Frazier
Brian W. Burnett
KIRTON McCONKIE
50 East South Temple, Suite 400
P.O. Box 45120
Salt Lake City, Utah 84111

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email rfrazier@kmclaw.com
bburnett@kmclaw.com

Doug Shipley
Intermountain Wind and Solar, LLC
1953 West 2425 South
Woods Cross, Utah 84087

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email doug@imwindandsolar.com



Kimberly Towell, Executive Assistant