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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY TO STUDY FIXED COSTS OF PROVIDING ELECTRIC SERVICE TO CUSTOMERS))))))	CASE NO. IPC-E-18-16 ANSWER TO IDAHO POWER COMPANY'S MOTION TO ACCEPT FIXED COST REPORT
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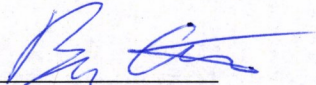
COMES NOW, the Idaho Conservation League, Vote Solar, NW Energy Coalition, Idaho Sierra Club, and the City of Boise, (collectively referred to herein as the "Parties"), pursuant to Rules of Procedure of the Idaho Public Utility Commission, IDAPA 31.01.01.057.03 with the following Answer to Idaho Power Company's ("Idaho Power") Motion to Accept Fixed Cost Report filed on September 30, 2019.

As parties to this docket, we have engaged in several meetings over the past nine months in a collaborative effort to define "a comprehensive customer fixed-cost analysis to determine the proper methodology and 'spread' of fixed costs as they relate to the Company's customer." *Order No 34190* (citing Petition at 2; citing *Order No. 34046* at 23.) Parties attempted to reach a consensus on how to do the study and the content that would be contained therein.

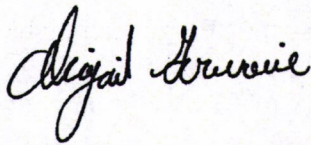
Unfortunately, Idaho Power's report to the Commission is narrowly focused on their preferred policy position and addresses a small set of rate design options that prioritize utility revenue recovery over other objectives. The Parties respectfully request that the Commission delay any decision regarding the Company's Motion to Accept Fixed Cost Report until after a comment

period of not less than ninety days. We look forward to providing the Commission with more detailed comments at that time.

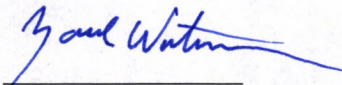
Respectfully submitted this 14th day of October 2019,



Benjamin J Otto
Idaho Conservation League
Local Council – Vote Solar, NW Energy Coalition



Abigail R. Germaine, Deputy City Attorney
City of Boise



Zack Waterman
Idaho Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, 2019, I delivered true and correct copies of the foregoing ANSWER TO MOTION to the following persons via the method of service noted:

Hand delivery:

Diane Hanian
Commission Secretary (Original and 7 copies provided)
Idaho Public Utilities Commission
11331 W Chinden Blvd
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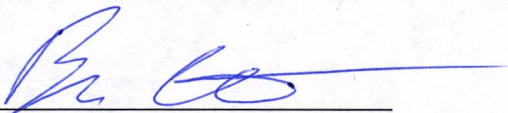
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