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LISA D. NORDSTROM  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

March 13, 2020

**VIA HAND DELIVERY**

Diane M. Hanian, Secretary  
Idaho Public Utilities Commission  
11331 West Chinden Blvd., Building 8  
Suite 201-A  
Boise, Idaho 83714

Re: Case No. IPC-E-20-14  
Fixed Cost Adjustment Rates for June 1, 2020, through May 31, 2021  
Idaho Power Company's Application and Testimony

Dear Ms. Hanian:

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

In addition, enclosed are an original and eight (8) copies of the Direct Testimony of Pawel P. Goralski filed in support of the Application. One copy of Mr. Goralski's testimony has been designated as the "Reporter's Copy." A disk containing a Word version of Mr. Goralski's testimony is enclosed for the Reporter.

Also enclosed are eight (8) copies of a disk containing the Excel files of Mr. Goralski's exhibits.

Lastly, four (4) copies each of Idaho Power Company's press release and customer notice are also enclosed.

Very truly yours,

Lisa D. Nordstrom

LDN:csb  
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  
[LNordstrom@idahopower.com](mailto:LNordstrom@idahopower.com)

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY FOR ) CASE NO. IPC-E-20-14  
AUTHORITY TO IMPLEMENT FIXED )  
COST ADJUSTMENT ("FCA") RATES ) APPLICATION  
FOR ELECTRIC SERVICE FROM JUNE 1, )  
2020, THROUGH MAY 31, 2021. )  
\_\_\_\_\_ )

Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* § 61-502 and RP 052, hereby respectfully makes application to the Idaho Public Utilities Commission ("Commission") for an order authorizing Idaho Power to implement FCA rates for electric service from June 1, 2020, through May 31, 2021, and to approve the Company's corresponding Schedule 54, Fixed Cost Adjustment. With this filing the Company proposes a \$710,580, or 0.02 percent, increase for Residential and Small General Service customers. If the FCA is approved as filed, a typical residential customer using 950 kilowatt-hours per month will see an approximate \$0.02 increase to their monthly bill.

In support of this Application, Idaho Power represents as follows:

## I. BACKGROUND

1. Idaho Power and the Commission have long agreed that promotion of cost-effective energy efficiency and demand-side management (“DSM”) “is an integral part of least-cost electric service.” See, e.g., Order No. 30267 at 13. Traditional rate design that recovers fixed costs through each kilowatt-hour (“kWh”) sold discourages utilities from reducing their sales volumes through investment in energy efficiency and DSM.

2. Recognizing that “opportunities exist[ed] for improvements in operating efficiency that would benefit the Company shareholders and its customers,” the Commission opened an investigation in Case No. IPC-E-04-15 to consider options for a performance-based mechanism that adjusts revenues when annual energy consumption is either above or below normal. Order No. 29558 at 1, *citing* Order No. 29505 at 68-69. The FCA mechanism is the collaborative result of that case.

3. In Order No. 30267 issued in Case No. IPC-E-04-15 on March 12, 2007, the Commission approved a stipulation for the implementation of a three-year FCA pilot program applicable to Residential Service (Schedules 1, 3, 4, and 5) and Small General Service (Schedule 7) customers. On October 1, 2009, the Company filed an application seeking authority to convert Schedule 54, the FCA tariff schedule, from a pilot program to an ongoing, permanent program. Case No. IPC-E-09-28. The Commission denied Idaho Power’s request to make the FCA mechanism permanent and, instead, extended the pilot program for an additional two-year period. Order No. 31063. During the fifth year of the pilot program, the Company filed an application in Case No. IPC-E-11-19 on October 19, 2011, seeking authority to convert the FCA to an ongoing, permanent program. Order No. 32505, issued March 30, 2012, approved the Company’s request to convert the FCA to a permanent program for the Residential and Small General Service

customers. The Commission's subsequent Order No. 32731 in that case directed that the FCA mechanism continue with its existing methodology.

4. In Order No. 33295 issued in Case No. IPC-E-14-17, the Commission approved a settlement stipulation that changed the methodology to calculate the level of actual fixed costs recovered used to determine the FCA. The modification to the calculation of the actual level of fixed costs recovered replaced weather-normalized billed sales with actual billed sales and began with the determination of the 2015 FCA.

5. In this filing, the Company requests recovery of the 2019 FCA balance and approval of the corresponding rates.

## **II. FCA MECHANISM**

6. The FCA mechanism enables Idaho Power to separate, or "decouple," its fixed cost revenues from its volumetric energy sales, and provides symmetry through a surcharge or credit when fixed cost recovery per customer, on an actual billed sales basis, varies above or below a Commission-established base. In other words, the FCA provides a "true-up" of the collection of fixed costs per customer to recover the difference between the level of fixed costs recovered on an actual billed sales basis by the Company through rates and the level of fixed costs authorized for recovery in the Company's most recent, applicable general rate case.

7. The FCA removes the financial disincentive that exists when the Company invests in DSM resources and energy efficiency activities. On a system-wide basis, Idaho Power achieved 203,041 megawatt-hours of incremental annual energy efficiency savings in 2019, which is a 10 percent increase from finalized savings achieved in 2018. The Company also invests in significant DSM educational and awareness activities and

marketing efforts that are likely to result in energy savings experienced by the customer but are not quantified or claimed as part of Idaho Power's annual savings.

8. The FCA works identically for both the Residential and Small General Service classes. For each class, the number of customers is multiplied by the fixed cost per customer rate (FCC), which is established as part of determining the Company's authorized revenue requirement in its most recent general rate case. The product of this calculation establishes the "authorized fixed cost recovery" amount. This authorized fixed cost recovery amount is then compared to the amount of fixed costs actually recovered by Idaho Power. To determine the "actual fixed costs recovered" amount, the Company multiplies the actual billed sales for each class by the fixed cost per energy rate (FCE), as established in the Company's most recent applicable general rate case. The difference between these two numbers (the "authorized fixed cost recovery" amount minus the "actual fixed costs recovered" amount) is the fixed cost adjustment for each class.

### **III. PROPOSED 2020-2021 FCA RATE ADJUSTMENT**

9. The determination of the FCA deferral balance and corresponding rates are described in the Direct Testimony of Pawel P. Goralski ("Goralski Testimony") filed contemporaneously with this Application.

10. As shown on Exhibit No. 4 of the Goralski Testimony, the proposed FCA is \$34,194,871 for the Residential class and \$1,303,985 for the Small General Service class, for a total amount of \$35,498,856. Goralski Testimony at 9. The proposed FCA deferral balance is slightly above the current FCA deferral balance currently collected in customers' rates. Accordingly, with this Application, Idaho Power is proposing an FCA rate increase for the Residential and Small General Service classes. The proposed FCA

rates would result in an annual increase of 0.02 percent from current billed revenue for the affected customer classes. Goralski Testimony at 13. This increase equates to new FCA rates of 0.6622 cents per kWh for the Residential class and 0.8381 cents per kWh for the Small General Service class. Goralski Testimony at 12.

11. Idaho Power requests that the FCA rates become effective on June 1, 2020, coincident with the Company's Power Cost Adjustment and with the commencement of seasonal rates. The Company requests that the FCA rates remain in effect until May 31, 2021.

12. The proposed FCA tariff (clean version), Schedule 54, is attached hereto as Attachment 1 to this Application. The Schedule 54 tariff in legislative format is attached hereto as Attachment 2.

#### **IV. MODIFIED PROCEDURE**

13. Idaho Power believes that a technical hearing is not necessary to consider the issues presented herein and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing. RP 201, *et seq.* The Company has, however, contemporaneously filed the Goralski Testimony and stands ready to present its testimony and support the Application if the Commission determines that a technical hearing is required.

#### **V. COMMUNICATIONS AND SERVICE OF PLEADINGS**

14. In conformance with RP 125, this Application will be brought to the attention of Idaho Power's customers by means of both a press release to media in the Company's service area and a customer notice distributed in customers' bills, both of which accompany this filing. The customer notice will be distributed over the course of the Company's current billing cycle, with the last notice being sent on or about April 20, 2020.

Idaho Power will also keep its Application, testimony, and exhibits open for public inspection at its offices throughout the state of Idaho. Idaho Power believes the above procedures satisfy the Rules of Practice and Procedure of this Commission; however, the Company will, in the alternative, bring the Application to the attention of its affected customers through any other means directed by this Commission.

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

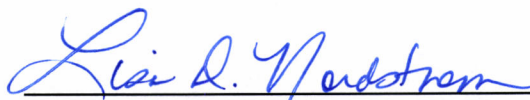
Lisa D. Nordstrom  
Idaho Power Company  
1221 West Idaho Street (83702)  
P.O. Box 70  
Boise, Idaho 83707  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

Pawel P. Goralski  
Idaho Power Company  
1221 West Idaho Street (83702)  
P.O. Box 70  
Boise, Idaho 83707  
[pgoralski@idahopower.com](mailto:pgoralski@idahopower.com)

#### **VI. REQUEST FOR RELIEF**

16. Idaho Power respectfully requests that the Commission issue an order (1) authorizing that this matter be processed by Modified Procedure and (2) authorizing Idaho Power to implement Fixed Cost Adjustment rates for electric service from June 1, 2020, through May 31, 2021, as described above.

DATED at Boise, Idaho, this 13<sup>th</sup> day of March 2020.



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LISA D. NORDSTROM  
Attorney for Idaho Power Company

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION  
CASE NO. IPC-E-20-14**

**IDAHO POWER COMPANY**

**ATTACHMENT 1  
PROPOSED TARIFF**





SCHEDULE 54  
FIXED COST ADJUSTMENT  
(Continued)

ACTUAL FIXED COSTS RECOVERED AMOUNT

The Actual fixed costs Recovered amount is computed by multiplying the actual energy load for Residential and Small General Service customers by the appropriate Residential and Small General Service FCE rate.

FIXED COST ADJUSTMENT

The Fixed Cost Adjustment (FCA) is the difference between the Allowed Fixed Cost Recovery Amount and the Actual Fixed Costs Recovered Amount divided by the estimated weather-normalized energy load for the following year for Residential and Small General Service Customers.

The monthly Fixed Cost Adjustment for Residential Service (Schedules 1, 3, 4, 5, and 6) is 0.~~65986622~~ cents per kWh. The monthly Fixed Cost Adjustment for Small General Service (Schedules 7 and 8) is 0.~~83668381~~ cents per kWh.

EXPIRATION

The Fixed Cost Adjustment included on this schedule will expire May 31, 20201.

**BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION  
CASE NO. IPC-E-20-14**

**IDAHO POWER COMPANY**

**ATTACHMENT 2  
TARIFF IN LEGISLATIVE FORMAT**



SCHEDULE 54  
FIXED COST ADJUSTMENT  
(Continued)

ACTUAL FIXED COSTS RECOVERED AMOUNT

The Actual fixed costs Recovered amount is computed by multiplying the actual energy load for Residential and Small General Service customers by the appropriate Residential and Small General Service FCE rate.

FIXED COST ADJUSTMENT

The Fixed Cost Adjustment (FCA) is the difference between the Allowed Fixed Cost Recovery Amount and the Actual Fixed Costs Recovered Amount divided by the estimated weather-normalized energy load for the following year for Residential and Small General Service Customers.

The monthly Fixed Cost Adjustment for Residential Service (Schedules 1, 3, 4, 5, and 6) is 0.6622 cents per kWh. The monthly Fixed Cost Adjustment for Small General Service (Schedules 7 and 8) is 0.8381 cents per kWh.

EXPIRATION

The Fixed Cost Adjustment included on this schedule will expire May 31, 2021.