

C. Tom Arkoosh, ISB No. 2253
ARKOOSH LAW OFFICES
913 W. River Street, Suite 450
P.O. Box 2900
Boise, ID 83701
Telephone: (208) 343-5105
Facsimile: (208) 343-5456
Email: tom.arkoosh@arkoosh.com
Admin copy: erin.cecil@arkoosh.com

Attorneys for IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY’S APPLICATION FOR
APPROVAL OF THE CAPACITY
DEFICIENCY TO BE UTILIZED FOR
AVOIDED COST CALCULATIONS

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Case No. IPC-E-21-09

**IDAHYDRO’S MOTION FOR ORDER
SETTING CAPACITY DEFICIENCY
DATE IN SUMMER 2023**

COMES NOW the Idaho Hydroelectric Power Producers Trust, an Idaho Trust, d/b/a IdaHydro (“IdaHydro”), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, and moves the Commission for its Order setting the capacity deficiency date in summer 2023. Idahydro bases this motion upon the concurrence of both Intervenor IdaHydro and Applicant Idaho Power Company (“Idaho Power”) that Idaho Power will be capacity deficient in the summer of 2023. This is based upon the coincidence of *IdaHydro’s Comments*, filed herein on July 21, 2021, and Idaho Power’s *Application for Authority to Proceed with Resource Procurements*, filed December 3, 2021, in Docket No. IPC-E-21-41, and attached to the *Declaration of C. Tom Arkoosh*, filed herein on December 9, 2021.

Oral argument is requested.

DATED this 10th day of December 2021.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 10th day of December 2021, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Commission Secretary	_____	U.S. Mail, Postage Prepaid
Idaho Public Utilities Commission	_____	Overnight Courier
11331 W. Chinden Blvd., Building 8,	_____	Hand Delivered
Suite 201-A	_____	Via Facsimile
P.O. Box 83720	<u> X </u>	E-mail:
Boise, ID 83720-0074		secretary@puc.idaho.gov

Matt Hunter	_____	U.S. Mail, Postage Prepaid
Idaho Public Utilities Commission	_____	Overnight Courier
11331 W. Chinden Blvd., Building 8,	_____	Hand Delivered
Suite 201-A	_____	Via Facsimile
P.O. Box 83720	<u> X </u>	E-mail:
Boise, ID 83720-0074		matt.hunter@puc.idaho.gov

Donovan E. Walker	_____	U.S. Mail, Postage Prepaid
Regulatory Dockets	_____	Overnight Courier
Idaho Power Company	_____	Hand Delivered
1221 West Idaho Street (83702)	_____	Via Facsimile
P.O. Box 70	<u> X </u>	E-mail:
Boise, ID 83707		dwalker@idahopower.com dockets@idahopower.com

Michael Darrington	_____	U.S. Mail, Postage Prepaid
Energy Contracts	_____	Overnight Courier
Idaho Power Company	_____	Hand Delivered
1221 West Idaho Street (83702)	_____	Via Facsimile
P.O. Box 70	<u> X </u>	E-mail:
Boise, ID 83707		mdarrington@idahopower.com energycontracts@idahopower.com

Peter J. Richardson	_____	U.S. Mail, Postage Prepaid
Richardson Adams, PLLC	_____	Overnight Courier
515 N. 27 th St.	_____	Hand Delivered
P.O. Box 7218	_____	Via Facsimile
Boise, ID 83702	<u> X </u>	E-mail:
		peter@richardsonadams.com

Dr. Don Reading
6070 Hill Road
Boise, ID 83703

U.S. Mail, Postage Prepaid
 Overnight Courier
 Hand Delivered
 Via Facsimile
 E-mail:
dreading@mindspring.com



C. Tom Arkoosh