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Attorneys for the IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	Case No. IPC-E-21-09
COMPANY’S APPLICATION FOR)	
APPROVAL OF THE CAPACITY)	SECOND DECLARATION OF C.
DEFICIENCY TO BE UTILIZED FOR)	TOM ARKOOSH
AVOIDED COST CALCULATIONS)	
)	
)	
)	
)	

C. TOM ARKOOSH, upon penalty of perjury, states:

1. I am counsel for Intervenor IdaHydro in the above-entitled action, and I make this declaration of my own personal knowledge.

2. That attached hereto as Exhibit A is a true and correct copy of *Idaho Power Company’s Response to IdaHydro’s First Set of Interrogatories* filed in the above-entitled action.

3. As provided by Idaho Code §9-1406, I certify and declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 15th day of February 2022.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for IdaHydro

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 15th day of February, 2022, a true and correct copy of the within and foregoing SECOND DECLARATION OF C. TOM ARKOOSH in Case No. IPC-E-21-09 was served, pursuant to Commission Order No. 34602, by electronic copy only, to:

Commission Secretary Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A P.O. Box 83720 Boise, ID 83720-0074	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Overnight Courier <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> E-mail: secretary@puc.idaho.gov
John R. Hammond, Jr. Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A P.O. Box 83720 Boise, ID 83720-0074	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Overnight Courier <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> E-mail: john.hammond@puc.idaho.gov
Donovan E. Walker Regulatory Dockets Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Overnight Courier <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> E-mail: dwalker@idahopower.com dockets@idahopower.com
Michael Darrington Energy Contracts Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Overnight Courier <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> E-mail: mdarrington@idahopower.com energycontracts@idahopower.com
Peter J. Richardson Richardson Adams, PLLC 515 N. 27 th St. P.O. Box 7218 Boise, ID 83702	<input type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Overnight Courier <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Via Facsimile <input checked="" type="checkbox"/> E-mail: peter@richardsonadams.com

Dr. Don Reading
6070 Hill Road
Boise, ID 83703

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_____ Overnight Courier
_____ Hand Delivered
_____ Via Facsimile
X _____ E-mail:
dreading@mindspring.com



C. Tom Arkoosh

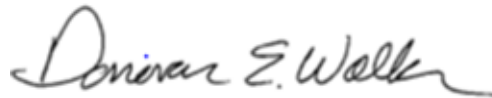
EXHIBIT A

REQUEST NO. 1: When is or will Idaho Power Company be capacity deficient?

RESPONSE TO IDAHDRO'S REQUEST NO. 1: Idaho Power's 2021 Integrated Resource Plan filed December 30, 2021, indicates a first capacity deficit in July 2023. Additionally, on February 4, 2022, Idaho Power filed a Motion and Amended Application in docket IPC-E-21-09 "Application for Capacity Deficiency To Be Utilized For Avoided Cost Calculations" which seeks to establish a first capacity deficiency of July 2023 for purposes of PURPA avoided cost pricing.

The response to this Request is sponsored by Mark Annis, Regulatory Consultant, Idaho Power Company.

Respectfully submitted this 11th day of February 2022.



DONOVAN E. WALKER
Attorney for Idaho Power Company