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IDAHO PUBLIC UTILITIES COMMISSION

C. Tom Arkoosh ISB # 2253 **ARKOOSH LAW OFFICES** 913 W. River Street, Suite 450 P.O. Box 2900 Boise, Idaho 83701 Telephone: (208) 343-5105 Fax: (208) 343-5456 Email: tom.arkoosh@arkoosh.com Admin copy: erin.cecil@arkoosh.com

Attorneys for the IdaHydro

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

Case No. IPC-E-21-09)

SUPPLEMENTAL INFORMATION) IN SUPPORT OF MOTION FOR **ORDER SETTING CAPACITY DEFICIENCY DATE IN SUMMER OF 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 supplements its Motion for Order Setting Capacity Deficiency Date in Summer 2023 that was filed on December 10, 2021, with the attached Second Declaration of C. Tom Arkoosh containing a copy of Idaho Power Company's Response to IdaHydro's First Set of Interrogatories. Idaho Power's response speaks for itself and needs no additional elaboration as to the appropriateness of setting the power company's first deficit date in the Summer of 2023.

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 SUPPLEMENTAL INFORMATION IN SUPPORT OF MOTION FOR ORDER SETTING CAPACITY DEFICIENCY DATE IN SUMMER OF 2023 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	Overn Hand Via Fa X	Mail, Postage Prepaid hight Courier Delivered acsimile il: ary@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	Overn Hand Via Fa X	Mail, Postage Prepaid hight Courier Delivered acsimile hi: hammond@puc.idaho.gov
Donovan E. Walker Regulatory Dockets Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	Overn Hand Via Fa X E-mai dwalk	Mail, Postage Prepaid hight Courier Delivered acsimile hl: <u>ter@idahopower.com</u> ts@idahopower.com
Michael Darrington Energy Contracts Idaho Power Company 1221 West Idaho Street (83702) P.O. Box 70 Boise, ID 83707	Overn Hand Via Fa X E-mai mdarr	Mail, Postage Prepaid hight Courier Delivered acsimile hl: <u>hington@idahopower.com</u> <u>ycontracts@idahopower.com</u>
Peter J. Richardson Richardson Adams, PLLC 515 N. 27 th St. P.O. Box 7218 Boise, ID 83702	Overn Hand Via Fa X	Mail, Postage Prepaid hight Courier Delivered acsimile 11: @richardsonadams.com

SUPPLEMENTAL INFORMATION IN SUPPORT OF MOTION FOR ORDER SETTING CAPACITY DEFICIENCY DATE IN SUMMER OF 2023 IN CASE NO. IPC-E-21-09 – PAGE 2

Dr. Don Reading 6070 Hill Road Boise, ID 83703

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 dreading@mindspring.com

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C. Tom Arkoosh

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