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UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IDAHO POWER COMPANY'S APPLICATION)	
TO UPDATE THE GAS FORECAST IN THE)	CASE NO. IPC-E-21-15
INCREMENTAL COST INTEGRATED)	
RESOURCE PLAN AVOIDED COST MODEL)	FIRST PRODUCTION
)	REQUEST OF THE
)	COMMISSION STAFF TO
)	IDAHO POWER COMPANY
)	

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, John R. Hammond Jr., Deputy Attorney General, request that Idaho Power Company ("Company") provide the following documents and information as soon as possible, or by **WEDNESDAY JUNE 23, 2021**.

This Production Request is continuing, and the Company is requested to provide, by way of supplementary responses, additional documents that it or any person acting on its behalf may later obtain that will augment the documents produced.

Please provide answers to each question, supporting workpapers that provide detail or are the source of information used in calculations. The Company is reminded that responses pursuant to Commission Rules of Procedure must include the name and phone number of the person preparing the document, and the name, location and phone number of the record holder and if different the witness who can sponsor the answer at hearing if need be. Reference IDAPA 31.01.01.228.

In addition to the written copies provided as response to the questions, please provide all Excel and electronic files on CD with formulas activated.

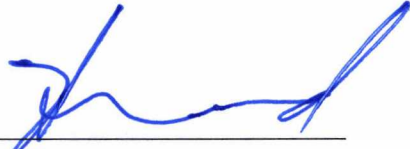
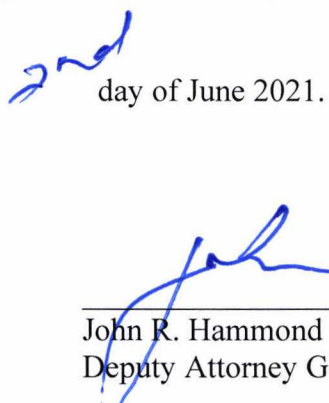
REQUEST NO. 1: The 2017 Integrated Resource Plan (“IRP”) used the U.S. Energy Information Administration’s (“EIA”) Henry Hub High Oil and Gas Resource and Technology forecast. The 2019 IRP used the gas forecast from S&P Global Platts (“Platts”). Please describe the key difference between the two methods and explain the advantages of the Platts forecast over the EIA forecast.

REQUEST NO. 2: The Application states that the 2021 Platts forecast is approximately 3% lower overall than the 2018 Platts forecast, except for the periods of 2021-2023 and 2039-2040. Please explain what causes the 2021 Platts forecast to be 3% lower and why the periods of 2021-2023 and 2039-2040 are exceptions.

REQUEST NO. 3: Please provide Table No. 1 in Confidential Attachment No. 1 in Excel format and include the 2021 EIA Henry Hub High Oil and Gas Resource and Technology forecast for comparison.

REQUEST NO. 4: Please explain how Platts determines the first five years of the natural gas forecasts and how forward market prices are used during this period of the forecast.

DATED at Boise, Idaho, this 2nd day of June 2021.



John R. Hammond
Deputy Attorney General

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 2ND DAY OF JUNE 2021,
SERVED THE FOREGOING **FIRST PRODUCTION REQUEST OF THE
COMMISSION STAFF TO IDAHO POWER COMPANY**, IN CASE NO.
IPC-E-21-15, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

DONOVAN E WALKER
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: dwalker@idahopower.com



SECRETARY

CERTIFICATE OF SERVICE