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IDAHO PUBLIC
UTILITIES COMMISSION

LISA D. NORDSTROM
Lead Counsel
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June 2, 2021

VIA ELECTRONIC FILING

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-21-17
In the Matter of the Application of Idaho Power Company for Authority to
Increase Its Rates for Electric Service to Recover Costs Associated with the
Jim Bridger Power Plant

Dear Ms. Noriyuki:

Enclosed for electronic filing, pursuant to Order No. 34602, please find Idaho Power Company's Application in the above matter.

In addition, attached is the Direct Testimony of Matthew T. Larkin and Ryan N. Adelman filed in support of the Application. Word versions are also attached for the Reporter.

Finally, a copy of Idaho Power Company's press release and customer notice is also attached.

Very truly yours,

Lisa D. Nordstrom

LDN:sh
Enclosures

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR) CASE NO. IPC-E-21-17
AUTHORITY TO INCREASE ITS RATES)
FOR ELECTRIC SERVICE TO) APPLICATION
RECOVER COSTS ASSOCIATED WITH)
THE JIM BRIDGER POWER PLANT.)
_____)

Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* § 61-502, 61-503, 61-524, 61-525, as well as RP 052, 121, and 125, hereby respectfully makes application to the Idaho Public Utilities Commission ("Commission") for an order authorizing Idaho Power to (1) accelerate the depreciation schedule for the Jim Bridger Power Plant ("Bridger") to allow the plant to be fully depreciated and recovered by December 31, 2030, (2) establish a balancing account, and the necessary regulatory accounting, to track the incremental costs and benefits associated with Idaho Power's cessation of participation in coal-fired operations at Bridger, and (3) adjust customer rates to recover the associated incremental annual levelized revenue requirement of \$30.83 million with an effective date of December 1, 2021, which equates to an overall increase of 2.53 percent. This Application is being filed concurrently with an application in Case No. IPC-E-21-18 requesting approval to institute revised depreciation

rates for the Company's electric plant-in-service and adjust Idaho jurisdictional base rates to reflect the revised depreciation rates ("Depreciation Application"). Idaho Power is simultaneously filing these applications in order to facilitate a single rate change for customers.

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

I. THE BRIDGER PLANT

1. The Bridger plant located near Rock Springs, Wyoming consists of four generating units. PacifiCorp has two-thirds ownership and is the operator of the facility. Idaho Power owns one-third, or 771 megawatts ("MW")¹ of Bridger. Unit 1 began commercial operation in 1974, Unit 2 in 1975, Unit 3 in 1976 and Unit 4 in 1979. Idaho Power's one-third share of the units' nominal net (or "net reliable") generation capacities are 177 MW, 180 MW, 174 MW and 175 MW, respectively. The Company and PacifiCorp (collectively, the "Co-Owners") work jointly to make decisions regarding the plant, including required investments and the retirement of the plant.

2. The plant is connected to the Borah West transmission path west of the Borah Substation near American Falls, Idaho. Idaho Power's one-third share of energy from Bridger flows west over this path. The Idaho-Wyoming path, or Bridger West, consists of three 345 kV transmission lines between Bridger and southeastern Idaho. The Company owns 800 MW of the 2,400 MW east-to-west capacity which effectively feeds into the Borah West path when power is moving east to west from Bridger.

3. The Bridger plant is adjacent to Idaho Power and PacifiCorp's co-owned Bridger Coal Company mine, which currently supplies sub-bituminous coal to the plant. Additionally, sub-bituminous coal is currently delivered to Bridger from the Black Butte mine via rail. Coal combustion residuals are disposed of on plant property in a solid waste landfill and a flue gas desulfurization waste surface impoundment. The plant also utilizes

¹ Generator nameplate rating.

evaporation ponds, which makes it effectively a “zero-discharge” facility.

4. The ownership and operation of Bridger is dictated by three agreements: the Agreement for the Ownership of the Jim Bridger Project between Idaho Power Company and Pacific Power & Light Company, the Agreement for the Construction of the Jim Bridger Project between Idaho Power Company and Pacific Power & Light Company, and the Agreement for the Operation of the Jim Bridger Project between Idaho Power Company and Pacific Power & Light Company, all of which are dated September 22, 1969, as amended by Amendments 1 through 9 (collectively, “Bridger Agreements”). The Bridger Agreements set forth the respective obligations of the Co-Owners with respect to the ownership, construction and operation of Bridger.

II. BRIDGER INVESTMENTS SINCE 2011

5. There have been a number of investments required to operate the plant in a safe, efficient, and reliable manner, including investments required to ensure environmental compliance as well as a number of investments for routine maintenance and repair. The Company is requesting a prudence determination on incremental Bridger investments since the last rate case, Case No. IPC-E-11-08, or those investments made at the plant during the January 1, 2012, through December 31, 2020, time period. Exhibit No. 3 to the direct testimony of Company witness Ryan N. Adelman presents Idaho Power’s share of the investments made at Bridger since 2011, detailing 841 different projects totaling \$266.3 million. For those projects for which Idaho Power’s ownership share is over \$1 million, the Company has included a project description and investment purpose classification as to whether the investment was for environmental compliance or for reliability.

6. The investments made at Bridger for environmental compliance make up nearly 50 percent of the total Bridger investments since January 1, 2012, with the two largest being the selective catalytic reduction (“SCR”) controls installation on Units 3 and

4. Aside from the SCR controls, other projects include mercury controls additions on all four units, replacement of the catalyst of the SCR control on Unit 3, modifications to the coal combustion residuals effluent system, and the relining of the scrubber absorber lining on Unit 4.

7. Idaho Power also funded investments required for the Bridger plant to reliably operate. There were 15 investments greater than \$1 million including an upgrade to the Bridger Unit 2 turbines, the replacement of the finishing superheater within the boiler of all four units, the replacement of the cooling towers on Units 1, 2 and 3, an update to the air preheater baskets on all four units, and the replacement of the pendant platens within the superheater on Unit 1.

III. BRIDGER ACCELERATED DEPRECIATION

8. Pursuant to Commission Staff's recommendation in Case No. IPC-E-03-07, Idaho Power files an updated depreciation study within five years of the Company's previous depreciation study. Because nearly five years have passed since the last update, filed October 21, 2016, in Case No. IPC-E-16-23, the Company began preparations in early 2021 to file a new depreciation study. Through these preparations, Idaho Power recognized that the Second Amended 2019 Integrated Resource Plan ("IRP") identified significant changes with regard to the economic life of the Bridger plant, warranting the need for specific review separate from the Company's general depreciation filing. Given the requirement to file an updated depreciation study this year, Idaho Power believes it is appropriate to consider Bridger-related issues concurrently with the comprehensive depreciation study filed in Case No. IPC-E-21-18.

9. Changing conditions have resulted in an expected exit from participation in operations of Bridger that is several years earlier than what is currently reflected in customer rates. Idaho Power's Second Amended 2019 IRP identified a preferred portfolio that included early Bridger unit exits in 2022, 2026, 2028, and 2030, concluding the earlier

exit from Bridger would provide a more favorable economic outcome as compared to an end-of-life assumption of 2034. In addition, while they differ from Idaho Power's exit dates, Bridger co-owner PacifiCorp identified exit dates beginning in 2023 in their 2019 IRP (Case No. PAC-E-19-16), providing additional indication that all units of the Bridger plant will not be operational through 2034. Given the complexity associated with the acceleration of Bridger's depreciation schedule and the implementation of the proposed cost recovery mechanism, the Company felt that a separate proceeding was appropriate to allow for full review of the issues presented herein.

10. With exit dates approaching and decommissioning costs that will be incurred on the horizon, Idaho Power believes a depreciable life of year-end 2030 for all units is appropriate as it will help minimize revenue requirement impacts to customers. In addition, accelerating the depreciation schedule at this time will more appropriately match the cost recovery with Idaho Power's participation in operation of the plant, rather than a unit-by-unit approach. This method is similar to the Commission-approved cost recovery treatment for Valmy, whereby depreciation expense recovery for both of the two units goes through 2028, even though Idaho Power's participation in each unit will have ceased in different years (2019 and 2025).²

IV. REGULATORY ACCOUNTING AND RATEMAKING TREATMENT

11. Idaho Power believes it will exit operations of Bridger by 2030, earlier than the current depreciable life of 2034. In addition to the earlier end-of-life date, Bridger will require incremental investments to maintain operations prior to the decommissioning of the plant. However, the specific timing and exact amounts of these future investments are not yet known. For these reasons, the Company proposes the establishment of a

² *In the Matter of the Application of Idaho Power Company for Authority to Increase Its Rates for Electric Service to Recover Costs Associated with the North Valmy Plant*, Case No. IPC-E-16-24, Order No. 33771 (May 31, 2017)

balancing account that would allow flexibility for the timing and recovery of the remaining Bridger revenue requirement.

12. There are four types of costs the Company anticipates recording to the balancing account: (1) the accelerated depreciation associated with existing Bridger plant investments, (2) the return on the undepreciated capital investments at Bridger, (3) non-fuel operations and maintenance (“O&M”) expense reductions, and (4) decommissioning costs related to the Bridger shutdown. Under the balancing account approach, the Company replaces the base rate revenue recovery associated with Idaho Power’s existing investment in Bridger with a levelized revenue requirement and tracks it in the Bridger balancing account, smoothing revenue requirement impacts associated with the exit of Bridger operations and allowing for full recovery of Bridger-related costs near the time Idaho Power exits plant operations. This will align the cost recovery period with the Company’s remaining participation in Bridger operations, resulting in a better matching of cost recovery from customers who benefit from the plant’s operations while mitigating the risk of future customers bearing the costs of a plant that will no longer be providing service to them. Additionally, through the proposed accounting treatment, customers will pay no more or no less than the actual O&M and capital-related costs of the Bridger plant beginning in 2021.

13. The proposed accounting treatment will accelerate depreciation expense related to all Bridger plant investments as compared to the current depreciable life based on a 2034 retirement date. There will be required investments at the plant in addition to its normal maintenance in order to keep the plant operational until that time. Idaho Power proposes to track the investment return and associated depreciation expense in the balancing account. In addition, the Company proposes to track Bridger-related decommissioning costs and O&M savings in the balancing account.

14. To accomplish a levelized revenue requirement collection period beyond the operational life of some of the Bridger units, Idaho Power is requesting the Commission issue an accounting order that allows the Company to make the needed accounting entries, including a regulatory asset account, that would allow for the matching of Generally Accepted Accounting Principles (“GAAP”) revenue recognition and related costs with the actual monthly pattern of the Bridger revenue requirement as compared to the levelized collection method and for collection of decommissioning costs that occur beyond 2030. In addition, because the Company will be required to make income tax filings and accounting entries consistent with the economics that actually occur rather than the levelized assumption the regulatory accounts are required to adjust the financial statement impacts resulting from the timing of Bridger-related GAAP accounting and income tax results.

15. As described more fully in the direct testimony of Company witness Matthew T. Larkin that accompanies this Application, Idaho Power requests recovery of the levelized revenue requirement that includes costs of accelerating the depreciation of the Bridger plant items, the return associated with capital investments net of accumulated depreciation forecasted through the Company’s participation in operations of Bridger, decommissioning costs associated with Bridger’s end-of-life, and O&M savings associated with non-fuel O&M reductions. The Idaho jurisdictional incremental annual levelized revenue requirement Idaho Power is requesting to recover in this proceeding is \$30,825,729.

16. The Company proposes to allocate the increase related to the Bridger balancing account using the jurisdictional separating study methodology consistent with that utilized to determine the Idaho jurisdictional revenue requirement in Case No. IPC-E-11-08. Idaho Power requests that the incremental revenue requirement of

approximately \$30.83 million be recovered from all customer classes through a uniform percentage increase to all base rate components except the service charge. The proposed change equates to an overall increase of 2.53 percent (see Attachment No. 1).

V. PROPOSED TARIFF

17. As explained above, Idaho Power is separately proposing rate changes associated with the Depreciation Application in Case No. IPC-E-21-18 in addition to the Bridger balancing account requested by this Application. The Company is filing one set of proposed tariff sheets specifying the proposed rates for providing retail electric service to customers in the state of Idaho following inclusion of both of the proposed rate changes.

18. Attachment No. 2 to this Application shows a comparison of revenues from the various tariff customers under Idaho Power's existing rates to the corresponding new revenue levels resulting from the proposed Bridger ratemaking treatment and the updated depreciation study. As set forth in Attachment No. 2, the proposed combined overall rate increase from both filings is 2.84 percent above current rates. The tariffs are being filed as Attachment Nos. 4 and 5 to the Company's Depreciation Application, in both clean and legislative format, respectively.

19. Idaho Power believes that filing individual sets of tariff sheets with each case as required by RP 121.01 would be administratively complex and would not aid the Commission and interested parties with their review of these proposed rate adjustments. The Company considers the filing of one set of tariff sheets with the cumulative impact of the proposed rates will comply with the spirit of the Commission's rule. Idaho Power will make a compliance filing when final orders are received on both of the proposed request to change rates effective December 1, 2021. The compliance filing will include tariff sheets that show the cumulative impact of rate changes associated with both cases.

VI. MODIFIED PROCEDURE

20. The Company believes that a 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.* If, however, the Commission determines that a technical hearing is required, the Company stands ready to present its testimony and support the Application in such hearing.

VII. COMMUNICATIONS AND SERVICE OF PROCEEDINGS

21. 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 Application. The customer notice will be distributed over the course of the Company's current billing cycle, with the last notice being sent on July 31, 2021. In addition to describing this filing, these customer communications also describe proposed rate changes associated with the Depreciation Application filed in Case No. IPC-E-21-18. Idaho Power will keep its Application open for public inspection by appointment at its offices throughout the state of Idaho. Idaho Power asserts that this notice procedure satisfies 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.

22. Service of pleadings, exhibits, orders, and other documents relating to this proceeding should be served on the following:

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Matt Larkin
Idaho Power Company
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P.O. Box 70
Boise, Idaho 83707
mlarkin@idahopower.com

VIII. REQUEST FOR RELIEF

23. Idaho Power respectfully requests the Commission issue an order authorizing Idaho Power to (1) accelerate the depreciation schedule for Bridger to allow the plant to be fully depreciated and recovered by December 31, 2030, (2) establish a balancing account, and the necessary regulatory accounting, to track the incremental costs and benefits associated with Idaho Power's cessation of participation in coal-fired operations at Bridger, and (3) adjust customer rates to recover the associated incremental annual levelized revenue requirement of \$30,825,729 with an effective date of December 1, 2021, which equates to an overall increase of 2.53 percent.

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



LISA D. NORDSTROM
Attorney for Idaho Power Company

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-21-17**

IDAHO POWER COMPANY

ATTACHMENT NO. 1

Idaho Power Company
Calculation of Revenue Impact 2021
State of Idaho
Bridger
Filed June 2, 2021

Summary of Revenue Impact
Current Billed Revenue to Proposed Billed Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers ⁽¹⁾	Normalized Energy (kWh) ⁽¹⁾	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed ⁽²⁾
<u>Uniform Tariff Rates:</u>										
1	Residential Service	1	477,534	5,240,253,884	\$550,004,972	104.96	\$13,351,981	\$563,356,953	107.51	2.43%
2	Master Metered Mobile Home Park	3	21	4,341,478	\$435,977	100.42	\$11,149	\$447,126	102.99	2.56%
3	Residential Service Energy Watch	4	0	0	\$0	0.00	\$0	\$0	0.00	N/A
4	Residential Service Time-of-Day	5	1,031	17,802,321	\$1,804,148	101.34	\$44,507	\$1,848,656	103.84	2.47%
5	Residential Service On-Site Generation	6	11,065	58,393,931	\$6,526,173	111.76	\$150,380	\$6,676,554	114.34	2.30%
6	Small General Service	7	30,043	139,128,290	\$18,180,055	130.67	\$422,827	\$18,602,881	133.71	2.33%
7	Small General Service On-Site Generation	8	75	208,675	\$29,315	140.48	\$642	\$29,958	143.56	2.19%
8	Large General Service	9	37,407	3,934,598,927	\$292,860,347	74.43	\$7,654,628	\$300,514,976	76.38	2.61%
9	Dusk to Dawn Lighting	15	0	6,042,348	\$1,311,574	217.06	\$37,949	\$1,349,523	223.34	2.89%
10	Large Power Service	19	117	2,357,982,907	\$139,663,084	59.23	\$3,643,926	\$143,307,010	60.78	2.61%
11	Agricultural Irrigation Service	24	18,952	1,866,103,711	\$152,034,272	81.47	\$4,072,984	\$156,107,256	83.65	2.68%
12	Unmetered General Service	40	1,585	12,559,488	\$1,109,147	88.31	\$30,398	\$1,139,545	90.73	2.74%
13	Street Lighting	41	2,687	25,881,987	\$3,637,602	140.55	\$102,013	\$3,739,614	144.49	2.80%
14	Traffic Control Lighting	42	728	2,765,756	\$178,947	64.70	\$4,743	\$183,690	66.42	2.65%
15	Total Uniform Tariffs		581,245	13,666,063,703	\$1,167,775,615	85.45	\$29,528,127	\$1,197,303,742	87.61	2.53%
16	Total Special Contracts		3	960,214,039	\$50,498,218	52.59	\$1,297,602	\$51,795,820	53.94	2.57%
17	Total Idaho Retail Sales		581,248	14,626,277,742	\$1,218,273,833	83.29	\$30,825,729	\$1,249,099,562	85.40	2.53%

(1) December 01, 2021 - November 30, 2022 Forecasted Test Year (April 2021 Forecast)

(2) Percentage impact does not include components which are applied as percentages, Riders and Franchise Fees.

Idaho Power Company
Calculation of Revenue Impact 2021
State of Idaho
Bridger
Filed June 2, 2021

Summary of Revenue Impact - Rates 9, 19, and 24 Distribution Level Detail
Current Billed Revenue to Proposed Billed Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers (1)	Normalized Energy (kWh) (1)	Current Billed Revenue	Mills Per kWh	Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed (2)
<u>Uniform Tariff Rates:</u>										
1	Large General Secondary	9S	37,136	3,343,242,049	\$253,201,964	75.74	\$6,626,376	\$259,828,340	77.72	2.62%
2	Large General Primary	9P	267	587,882,798	\$39,396,438	67.01	\$1,021,590	\$40,418,028	68.75	2.59%
3	Large General Transmission	9T	4	3,474,080	\$261,946	75.40	\$6,663	\$268,608	77.32	2.54%
4	Total Schedule 9		37,407	3,934,598,927	\$292,860,347	74.43	\$7,654,628	\$300,514,976	76.38	2.61%
6	Large Power Secondary	19S	1	5,417,057	\$357,606	66.01	\$9,489	\$367,095	67.77	2.65%
7	Large Power Primary	19P	114	2,319,529,387	\$137,455,878	59.26	\$3,586,640	\$141,042,518	60.81	2.61%
8	Large Power Transmission	19T	2	33,036,463	\$1,849,600	55.99	\$47,797	\$1,897,397	57.43	2.58%
9	Total Schedule 19		117	2,357,982,907	\$139,663,084	59.23	\$3,643,926	\$143,307,010	60.78	2.61%
11	Irrigation Secondary	24S	18,952	1,866,103,711	\$152,034,272	81.47	\$4,072,984	\$156,107,256	83.65	2.68%
12	Irrigation Transmission	24T	0	0	\$0	0.00	\$0	\$0	0.00	0.00%
13	Total Schedule 24		18,952	1,866,103,711	\$152,034,272	81.47	\$4,072,984	\$156,107,256	83.65	2.68%

(1) December 01, 2021 - November 30, 2022 Forecasted Test Year (April 2021 Forecast)

(2) Percentage impact does not include components which are applied as percentages, Riders and Franchise Fees.

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-21-17**

IDAHO POWER COMPANY

ATTACHMENT NO. 2

Idaho Power Company
Calculation of Revenue Impact 2021
State of Idaho
Bridger & Depreciation
Filed June 2, 2021

Summary of Revenue Impact
Current Billed Revenue to Proposed Billed Revenue

Line No	Tariff Description	Rate Sch. No.	Average Number of Customers ⁽¹⁾	Normalized Energy (kWh) ⁽¹⁾	Current Billed Revenue	Mills Per kWh	Total Adjustments to Billed Revenue	Proposed Total Billed Revenue	Mills Per kWh	Percent Change Billed to Billed ⁽²⁾ Revenue
<u>Uniform Tariff Rates:</u>										
1	Residential Service	1	477,534	5,240,253,884	\$550,004,972	104.96	\$14,982,731	\$564,987,703	107.82	2.72%
2	Master Metered Mobile Home Park	3	21	4,341,478	\$435,977	100.42	\$12,511	\$448,487	103.30	2.87%
3	Residential Service Energy Watch	4	0	0	\$0	0.00	\$0	\$0	0.00	N/A
4	Residential Service Time-of-Day	5	1,031	17,802,321	\$1,804,148	101.34	\$49,943	\$1,854,092	104.15	2.77%
5	Residential Service On-Site Generation	6	11,065	58,393,931	\$6,526,173	111.76	\$168,747	\$6,694,920	114.65	2.59%
6	Small General Service	7	30,043	139,128,290	\$18,180,055	130.67	\$474,469	\$18,654,524	134.08	2.61%
7	Small General Service On-Site Generation	8	75	208,675	\$29,315	140.48	\$721	\$30,036	143.94	2.46%
8	Large General Service	9	37,407	3,934,598,927	\$292,860,347	74.43	\$8,589,530	\$301,449,877	76.62	2.93%
9	Dusk to Dawn Lighting	15	0	6,042,348	\$1,311,574	217.06	\$42,584	\$1,354,158	224.11	3.25%
10	Large Power Service	19	117	2,357,982,907	\$139,663,084	59.23	\$4,088,978	\$143,752,062	60.96	2.93%
11	Agricultural Irrigation Service	24	18,952	1,866,103,711	\$152,034,272	81.47	\$4,570,440	\$156,604,712	83.92	3.01%
12	Unmetered General Service	40	1,585	12,559,488	\$1,109,147	88.31	\$34,110	\$1,143,258	91.03	3.08%
13	Street Lighting	41	2,687	25,881,987	\$3,637,602	140.55	\$114,472	\$3,752,074	144.97	3.15%
14	Traffic Control Lighting	42	728	2,765,756	\$178,947	64.70	\$5,322	\$184,269	66.63	2.97%
15	Total Uniform Tariffs		581,245	13,666,063,703	\$1,167,775,615	85.45	\$33,134,558	\$1,200,910,173	87.88	2.84%
16	Total Special Contracts		3	960,214,039	\$50,498,218	52.59	\$1,456,085	\$51,954,303	54.11	2.88%
17	Total Idaho Retail Sales		581,248	14,626,277,742	\$1,218,273,833	83.29	\$34,590,643	\$1,252,864,476	85.66	2.84%

(1) December 01, 2021 - November 30, 2022 Forecasted Test Year (April 2021 Forecast)

(2) Percentage impact does not include components which are applied as percentages, Riders and Franchise Fees.

Idaho Power Company
Calculation of Revenue Impact 2021
State of Idaho
Bridger & Depreciation
Filed June 2, 2021

Summary of Revenue Impact - Rates 9, 19, and 24 Distribution Level Detail
Current Billed Revenue to Proposed Billed Revenue

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<u>Uniform Tariff Rates:</u>										
1	Large General Secondary	9S	37,136	3,343,242,049	\$253,201,964	75.74	\$7,435,692	\$260,637,655	77.96	2.94%
2	Large General Primary	9P	267	587,882,798	\$39,396,438	67.01	\$1,146,362	\$40,542,800	68.96	2.91%
3	Large General Transmission	9T	4	3,474,080	\$261,946	75.40	\$7,477	\$269,422	77.55	2.85%
4	Total Schedule 9		37,407	3,934,598,927	\$292,860,347	74.43	\$8,589,530	\$301,449,877	76.62	2.93%
6	Large Power Secondary	19S	1	5,417,057	\$357,606	66.01	\$10,648	\$368,254	67.98	2.98%
7	Large Power Primary	19P	114	2,319,529,387	\$137,455,878	59.26	\$4,024,696	\$141,480,574	61.00	2.93%
8	Large Power Transmission	19T	2	33,036,463	\$1,849,600	55.99	\$53,634	\$1,903,235	57.61	2.90%
9	Total Schedule 19		117	2,357,982,907	\$139,663,084	59.23	\$4,088,978	\$143,752,062	60.96	2.93%
11	Irrigation Secondary	24S	18,952	1,866,103,711	\$152,034,272	81.47	\$4,570,440	\$156,604,712	83.92	3.01%
12	Irrigation Transmission	24T	0	0	\$0	0.00	\$0	\$0	0.00	0.00%
13	Total Schedule 24		18,952	1,866,103,711	\$152,034,272	81.47	\$4,570,440	\$156,604,712	83.92	3.01%

(1) December 01, 2021 - November 30, 2022 Forecasted Test Year (April 2021 Forecast)

(2) Percentage impact does not include components which are applied as percentages, Riders and Franchise Fees.