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IDAHO PUBLIC
UTILITIES COMMISSION

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October 1, 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 Idaho Power Company's Application for Authority to
Increase Its Rates for Electric Service to Recover Costs Associated with the
Jim Bridger Power Plant

Dear Ms. Noriyuki:

Attached for electronic filing, pursuant to Order No. 35058, please find Joint Motion
to Suspend Procedural Schedule.

If you have any questions about the attached filing, please do not hesitate to
contact me.

Very truly yours,

Lisa D. Nordstrom

LDN:sg
Enclosure

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Attorney for the Commission Staff

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 RECOVER)	JOINT MOTION TO SUSPEND
COSTS ASSOCIATED WITH THE JIM)	PROCEDURAL SCHEDULE
BRIDGER PLANT)	
_____)	

Pursuant to Procedural Rule 056, Idaho Power Company (Idaho Power or Company) and the Idaho Public Utilities Commission Staff (Staff) (collectively the "Movants") submit this Motion to Suspend the Procedural Schedule to the Idaho Public Utilities Commission (Commission) in the above-captioned case. As described in more detail below, the Movants request this suspension to allow Movants the opportunity to assess this case in light of new developments that may impact operation of the Jim Bridger Power Plant (Bridger).

I. BACKGROUND

1. Idaho Power and PacifiCorp jointly own the Bridger plant located in Rock Springs, Wyoming. Bridger is comprised of four coal-fired units built in the 1970s. PacifiCorp owns two-thirds of Bridger and is the plant operator; Idaho Power owns one-third, or 771 megawatts of generator nameplate capacity.

2. On June 2, 2021, Idaho Power submitted an Application requesting the Commission authorize Idaho Power to (1) accelerate Bridger unit depreciation schedules 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 customers 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.

3. On June 24, 2021, the Commission issued Order No. 35088 with a Notice of Application and Notice of Intervention Deadline in this case.

4. Following the intervention period, the Commission issued a Notice of Parties on July 28, 2021. No other case procedure or deadlines have been set to date.

5. Bridger emission controls are required to comply with the Clean Air Act Regional Haze Rules and the resulting Wyoming Regional Haze State Implementation Plan (Wyoming SIP). To mitigate the effects of nitrogen dioxide (NO_x) controls for regional haze, selective catalytic reduction (SCR) equipment was installed on Jim Bridger Units 3 and 4 by the dates required by Wyoming in state law and by EPA in the 2014 final rule.

6. On February 5, 2019, plant operator PacifiCorp submitted to Wyoming an application and proposed State Implementation Plan (SIP) revision instituting reduced plant-wide month-by-month emission limits for NO_x and sulfur dioxide (SO₂), in addition to an annual total combined emission cap of NO_x and SO₂, on all four Jim Bridger units in lieu of the requirement to install SCR equipment on Units 2 and 1 by December 31, 2021 and 2022, respectively. The proposed SIP revision states that the proposed limits are more cost effective while leading to better modeled visibility than the SCR installation on Units 1 and 2 required in the federally approved SIP.¹

7. Wyoming's proposed approval of the SIP revision was published for public comment July 20, 2019, through August 23, 2019. On May 5, 2020, the Wyoming Department of Environmental Quality issued permit P0025809 with PacifiCorp's proposed monthly and annual NO_x and SO₂ emission limits. Under the permit, the new emission limits become effective January 1, 2022. Wyoming submitted a corresponding regional haze SIP revision to U.S. Environmental Protection Agency (EPA) on May 14, 2020. EPA has not taken formal action responding to the SIP revision. Discussions between EPA, Wyoming, and PacifiCorp regarding the SIP revision and regional haze compliance at Jim Bridger are ongoing.

8. On September 1, 2021, PacifiCorp's Rocky Mountain Power business unit submitted PacifiCorp's 2021 Integrated Resource Plan (IRP) for Commission acknowledgment in Case No. PAC-E-21-19.

¹ *PacifiCorp's Application for Acknowledgment of the 2021 Integrated Resource Plan*, Case No. PAC-E-21-19, pp. 55-56 (updated original filed September 15, 2021).

9. PacifiCorp's 2021 IRP preferred portfolio and Action Plan envisions the cessation of coal-fired generation in Bridger Units 1 and 2 in 2023 with a natural gas conversion of those units in 2024 to meet its load and reliability requirements.²

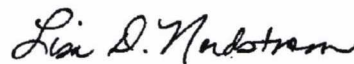
II. JOINT MOTION

10. Given that it is not possible to substantively respond to discovery requests in this case until greater clarity is achieved concerning Bridger emission limits and possible coal-to-gas unit conversion, the Movants respectfully request that the procedural schedule and discovery be suspended until a procedural schedule can be established. Once more information is known, Idaho Power will make a filing recommending next steps in this proceeding.

III. CONCLUSION

11. The Movants seek this suspension to allow Movants the opportunity to assess this case in light of new developments that may impact operation of the Bridger plant. Once more information is known, Idaho Power will make a filing recommending next steps in this proceeding.


DATED at Boise, Idaho, this 1st day of October 2021.



LISA D. NORDSTROM
Attorney for Idaho Power Company

² *Id.*, pp. 15, 24, 253, 299, 322.

DATED at Boise, Idaho, this 1st day of October ~~September~~ 2021.



ERICK SHANER
Attorney for Idaho Public Utilities
Commission

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 1st day of October 2021, I served a true and correct copy of the Joint Motion to Suspend Procedural Schedule upon the following named parties by the method indicated below, and addressed to the following:

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