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IDAHO PUBLIC  
UTILITIES COMMISSION

**Megan Goicoechea Allen**  
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August 24, 2022

Jan Noriyuki, Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Boulevard  
Building 8, Suite 201-A  
Boise, Idaho 83714

Re: Case No. IPC-E-21-37  
Application of Idaho Power Company for Authority to Establish A New  
Schedule to Serve Speculative High-Density Load Customers

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Comments on Reconsideration in the above-entitled matter.

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

Sincerely,

Megan Goicoechea Allen

MGA:sg  
Enclosure

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION	)	CASE NO. IPC-E-21-37
OF IDAHO POWER COMPANY FOR	)	
AUTHORITY TO ESTABLISH NEW	)	IDAHO POWER COMPANY'S
SCHEDULE TO SERVE SPECULATIVE	)	COMMENTS ON
HIGH-DENSITY LOAD CUSTOMERS.	)	RECONSIDERATION
	)	
	)	
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On July 6, 2022, GeoBitmine LLC (“GeoBitmine” or “Petitioner”), a prospective customer of Idaho Power Company (“Idaho Power” or “Company”) submitted a Petition for Reconsideration of Idaho Public Utilities Commission (“Commission”) Order No. 35428 authorizing Schedule 20 – Speculative High-Density Load (“Schedule 20”). These comments are made pursuant to Rule 332 of the Rules of Procedure of the Commission and the Order granting GeoBitmine’s Petition for Reconsideration, Order No. 35488 issued August 3, 2022.

In authorizing the creation of a new electric service schedule to provide service to potential HDL customers, the Commission noted that establishing Schedule 20 was “a reasonable approach to proactively mitigate potential stranded asset costs to its core

customers.”<sup>1</sup> Subsequently, in response to GeoBitmine’s request for reconsideration of this decision, the Commission found additional consideration of certain issues raised in GeoBitmine’s Petition would be appropriate, though it noted that the issue of Idaho Power’s determination of Schedule 20’s applicability to GeoBitmine was beyond the scope of this case.<sup>2</sup>

The Company appreciates the opportunity to offer additional comments on the issues raised by GeoBitmine’s Petition and to explain why Order No. 35428 was reasonable, lawful, appropriate, and in conformity with the law. Specifically, as set forth more fully herein: 1) the law and case record support establishment of Schedule 20; 2) Schedule 20’s applicability criteria are appropriate to identify speculative, transient loads that pose heightened stranded asset risk; and 3) recent cryptocurrency market conditions validate the need for the Commission’s adoption of Schedule 20 to protect customers from the potential of cost shifts from stranded assets.

**I. THE LAW AND CASE RECORD SUPPORT COMMISSION ESTABLISHMENT OF SCHEDULE 20.**

The service parameters and rates in Schedule 20 are reasonable and in conformance with *Idaho Code* § 61-315, do not discriminate between similarly situated customers, and are consistent with prior Commission determinations of rate differentiation.

Moreover, moratoriums on new service for cryptocurrency mining customers have

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<sup>1</sup> Order No. 35428, p. 6.

<sup>2</sup> Order No. 35488, p. 9-10 (“While we agree that GeoBitmine may have a substantial interest in whether the Company appropriately required GeoBitmine to take service under Schedule 20, we find this issue to be beyond the scope of this case and appropriately addressed in a separate proceeding or agreement between the Company and GeoBitmine.”).

been placed or upheld in several cities and local public utility districts in Washington State, and the New York State Senate recently passed a moratorium sent to the governor for signing, which while not binding on this Commission is persuasive of the need for differentiation. Similarly, local regulators found it appropriate to set a special energy rate structure for evolving industries including cryptocurrency mining, which was affirmed by the U.S. Court of Appeals for the Ninth Circuit.<sup>3</sup>

Schedule 20 is non-discriminatory and consistent with decisions of the Idaho Supreme Court.<sup>4</sup> The Commission acted lawfully and prudently in approving the establishment of a separate rate class to protect all other customers from potential cost-shifts. GeoBitmine makes claim that “Schedule 20 was approved by the Commission in complete disregard for any of the five factors identified by the Idaho Supreme Court in the *Homebuilders* decision.”<sup>5</sup> Idaho Power disagrees. In reviewing the Commission’s authority to regulate and fix charges and rates in a non-discriminatory and non-preferential manner, the Idaho Supreme Court noted: “Not all differences in a utility’s rates and charges as between different classes of customers constitute unlawful discrimination or preference. . . .”<sup>6</sup> The Court confirmed that the setting of different rates and charges for the different classes of customers may be justified by “a reasonable classification of utility

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<sup>3</sup> *Cytline, LLC v. Pub. Util. Dist. No. 2 of Grant Cnty., Washington*, 849 Fed.Appx. 656 (9<sup>th</sup> Cir. 2021). See also *Ninth Circuit Affirms Special Power Rate for Cryptocurrency Miners*, Sidley Environmental and Energy Brief, March 18, 2021, <https://sidleyenergyblog.sidley.com/ninth-circuit-affirms-special-power-rate-for-cryptocurrency-miners/>

<sup>4</sup> See, e.g., *Idaho State Homebuilders v. Washington Water Power*, 107 Idaho 415, 420,690 P.2d 350, 355 (1984).

<sup>5</sup> Petition for Reconsideration, p. 13.

<sup>6</sup> *Idaho State Homebuilders*, 107 Idaho at 420, 690 P.2d at 355.

customers” based on factors such as cost of service, quantity of electricity used, differences in conditions of service, or the time, nature, and pattern of use.<sup>7</sup>

Consistent with the legal precedent specifically identifying “time, nature, and pattern of use” as factors that may justify separate classification of customers, Idaho Power’s Application highlights the transitory nature of cryptocurrency mining operations worldwide.<sup>8</sup> The quick influx of transitory load into, and potentially out of, Idaho Power’s service area creates significant risk that costs created by the transitory load will ultimately become the burden of other customers.

Contrary to GeoBitmine’s assertion, Schedule 20 is not discriminatory or otherwise improper. Schedule 20 rate components mirror existing customer rates, marginal energy prices, and interruptibility requirements that have previously been approved by the Commission in relation to other Idaho Power service offerings.<sup>9</sup>

**II. SCHEDULE 20 APPLICABILITY CRITERIA IDENTIFIES SPECULATIVE, TRANSITORY LOADS THAT POSE HEIGHTENED STRANDED ASSET RISK.**

***Applicability of Schedule 20***

While cryptocurrency mining operations are the primary example of this type of potential customer, given their reliance on the proof-of-work authentication method, Idaho Power is only concerned with the nature of the load that results given the potential transitory nature of their operations, the quantity of electricity used, and the nature and pattern of use, which have repercussions for Idaho Power’s system and other customers.

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<sup>7</sup> *Id.*, citing *Utah Idaho Sugar Company v. Intermountain Gas*, 100 Idaho 368, 597 P.2d 1058 (1979).

<sup>8</sup> Application, p. 3,13.

<sup>9</sup> Idaho Power Company’s Answer to GeoBitmine LLC’s Petition for Reconsideration & Objection to Late Intervention (“Idaho Power’s Answer”), p. 4-5, 8-12.

The applicability of Schedule 20 is not determined based solely on an applicant's proffered industry, but through evaluation of the criteria discussed more fully below.

In approving the establishment of Schedule 20, the Commission allows speculative, high-density load customers to join Idaho Power's system in a configuration that balances providing service to these customers with protecting other customers from the potential of future cost-shifts from stranded generation and transmission investment to serve the Schedule 20 customer segment. Due to the nature of proof-of-work authentication, operations that utilize this authentication method share certain traits that may increase volatility on electrical load; they are able to both quickly establish service in high concentrations at single or various locations in a utility's service area, and with the same speed reduce load or relocate outside of a utility's service area. The need to establish a new customer class and service schedule was driven by these attributes and the resultant impact on the electrical system.

Prior to implementation of Schedule 20, there was not a service schedule that appropriately accounted for the distinctive attributes of potential HDL customers. Idaho Power's Schedule 19 requires that customer's exceeding 20,000 kW of demand enter into a special contract with the Company, which is reviewed and approved by the Commission. A special contract allows for evaluation of an individual customer's unique load requirements, system impacts, and contract provisions necessary to limit cost-shifts to other customers. As the Company described in its Application,<sup>10</sup> the nature of cryptocurrency operations to easily disaggregate their load to multiple points of delivery to fall under Idaho Power's special contract threshold and take service under tariff rates,

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<sup>10</sup> Application, p. 13.

in part, necessitated the need to develop Schedule 20. The requirements for mandatory interruption during the peak June 15 to September 15 season, as well as energy charged at a marginal rate, provide cost-shift protections to all Idaho Power customers under a standard tariff rate that would otherwise require development of a special contract for each new Schedule 20 customer.

As outlined in Schedule 20, service under the schedule is applicable and mandatory for customers who: 1) can relocate quickly in response to short-term economic signals, *and* 2) meet four or more of the listed criteria. It is the combination of both the first criterion and meeting four or more of the additional seven criteria that narrows applicability specifically to customers that may represent demand on Idaho Power's system whose load may also be transient in nature.

The first criterion includes both the ability to quickly relocate and the influence of short-term economic signals on the customer. Short-term economic signals may include exposure to stock, commodity, currency, or other assets, which are valued on a market such as cryptocurrencies and non-fungible tokens, as well as the customer's electricity prices.<sup>11</sup> Quick relocation may be completed in a manner of weeks or months, in a period of time of less than a year. As an example, a traditional mineral miner has exposure to economic signals from the price of minerals on the spot or futures market. However, the change in the spot or futures price of minerals does not motivate a miner to relocate their mining operation from one utility's service area to another utility's service area in a manner of weeks or months due to the large investments in plant, equipment, machinery, and

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<sup>11</sup> Turner Wright, *Crypto miner Digihost plans to move rigs from New York to Alabama*, Cointelegraph (Aug.2, 2022), <https://cointelegraph.com/news/crypto-miner-digihost-plans-to-move-rigs-from-new-york-to-alabama>.

buildings required to extract mineral substances from the ground. Short-term economic signals are not limited to exposure to stock, commodity, currency, or other assets, but may also be influenced based on input prices such as electricity and the difficulty in completing industrial processes such as computational hash rate, among others.

The remaining seven criteria to consider as part of the second inquiry under Schedule 20 are set forth below, along with specifications for the application of the criteria as applicable, which were previously provided by Idaho Power in response to discovery requests:<sup>12</sup>

- High energy use density: Energy use of 250 kilowatt-hours or greater per square foot annually.
- High load factor: 85 percent or greater annually.
- Load that is portable and distributable: A characteristic of Application-Specific Integrated Circuit (“ASIC”) or other highly specialized cryptocurrency specific hardware. A single machine is approximately the size of a shoe box and ranges in load from 1.3 kilowatt (“kW”) to over 3 kW. ASIC and other mining machines have limited infrastructure needs, namely electricity and internet, and may be disaggregated quickly. To illustrate, machines at one central location of 1 megawatt could easily disaggregate to 10 locations of 100 kW each, which is not typical of traditional data centers that are designed with more permanent placement of equipment.
- Highly variable load growth or load reduction as an individual customer and/or in aggregate with similar customers in the Company’s service area: Changes in requested load growth or load reductions from customers would be evaluated on a case-by-case basis, and is consistent with the customer requirements as outlined in Idaho Power’s Rule K.<sup>13</sup>
- High sensitivity to volatile commodity or asset prices: Based on the significant price

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<sup>12</sup> See Idaho Power Company’s Response to First Production Requests of the Industrial Customers of Idaho to Idaho Power, p. 7-14.

<sup>13</sup> Idaho Power’s Rule K, Change in Load Characteristic, requires “the Customer shall give the Company prior notice before making any significant change in either the amount or electrical character of the Customer’s electrical load thereby allowing the Company to determine if any changes are needed in the Company’s equipment or distribution system.”  
<https://docs.idahopower.com/pdfs/aboutus/ratesregulatory/tariffs/35.pdf>



declines and increases for Bitcoin<sup>14</sup> as documented in the Company's Application, customer sensitivity to an asset such as cryptocurrencies would meet the criteria.

- Part of an industry with potential to quickly become a large concentration of power demand
- Lack of credit history or ability to demonstrate financial viability

### ***System Costs and Benefits from Mandatory Interruption***

Schedule 20 includes a maximum of 225 event hours each June 15 through September 15 season, up to ten hours between 1 p.m. and 11 p.m., Monday through Friday, which even if fully utilized still results in uptime (or load factor) of 97.4 percent for the year. Idaho Power's largest customers do not approach load factors of 97.4 percent annually, and most data centers project load factors of approximately 90 percent.

As previously described by the Company, interruptible rates are commonplace in utility regulation generally and specifically in relation to cryptocurrency mining operations.<sup>15</sup> Many of these interruptible rates offer payment for the load curtailed during an event, similar to Idaho Power's demand response programs. While the current Schedule 20 rate design does not currently include an interruption crediting component, in accordance with Staff's recommendation<sup>16</sup> and the directive of the Commission,<sup>17</sup> Idaho Power will evaluate the costs and benefits of the interruption requirement after Schedule 20 customers have joined the system and before the next general rate case.

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<sup>14</sup> There are more than 300 cryptocurrencies which utilize proof-of-work authentication. Bitcoin represents the overwhelming majority of activity and has the largest market capitalization, making up nearly two-thirds of the entire market capitalization for all proof-of-work cryptocurrencies (as of August 19, 2022). <https://cryptoslate.com/cryptos/proof-of-work/>

<sup>15</sup> See Idaho Power's Answer, p. 11.

<sup>16</sup> Staff Comments, p. 8.

<sup>17</sup> Order No. 35428, p. 6-7.

Through either a future reduction in cost assignment in recognition of the ability to be curtailed, or potentially a crediting mechanism, Schedule 20 provides a non-discriminatory service offering that takes into account the particular usage and service characteristics of this specific class of customers.

### **III. CRYPTOCURRENCY MARKET CONDITIONS VALIDATE THE COMMISSION'S ADOPTION OF SCHEDULE 20 TO PROTECT CUSTOMERS**

As the price of Bitcoin enters its third month of prices hovering below \$25,000 per Bitcoin, the impact experienced by well-established, and previously highly capitalized cryptocurrency market participants,<sup>18</sup> demonstrates the necessity of the Commission's approach to insulate customers from the impact of HDL customers. Depressed Bitcoin prices since June 2022 have resulted in cryptocurrency hedge fund bankruptcies,<sup>19</sup> cryptocurrency exchange liquidations and withdrawal lock ups,<sup>20</sup> as well as other early signs of financial stress among large Bitcoin miners liquidating Bitcoin holdings to maintain cash flow<sup>21</sup> and at least one instance of a Bitcoin mining hosting contract being

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<sup>18</sup> Jonathan Ponciano, *Crypto Winter Watch: All The Big Layoffs, Record Withdrawals And Bankruptcies Sparked By The \$2 Trillion Crash*, Forbes (Jul. 7, 2022), <https://www.forbes.com/sites/jonathanponciano/2022/07/07/crypto-winter-watch-all-the-big-layoffs-record-withdrawals-and-bankruptcies-sparked-by-the-2-trillion-crash/?sh=317610e97b44>.

<sup>19</sup> Emma Roth, *Crypto hedge fund Three Arrows files for bankruptcy*, The Verge (Jul. 2, 2022), <https://www.theverge.com/2022/7/2/23192810/three-arrows-capital-chapter-15-bankruptcy-cryptocurrency>.

<sup>20</sup> Ryan Browne & Arjun Kharpal, *Crypto lender Celsius pauses withdrawals due to 'extreme market conditions'*, CNBC (Jun. 13, 2022), <https://www.cnbc.com/2022/06/13/crypto-lender-celsius-pauses-withdrawals-bitcoin-slides.html>.

<sup>21</sup> Alys Key, *Crypto Miner Core Scientific Dumps \$165M Bitcoin to 'Enhance Liquidity'*, Decrypt (Jul. 6, 2022), <https://decrypt.co/104493/crypto-miner-core-scientific-dumps-165m-bitcoin-to-enhance-liquidity>; Jennifer Sor, *Rising energy costs and plummeting crypto prices mean public bitcoin miners are 'fighting to survive'*, Insider (Jul. 5, 2022), <https://markets.businessinsider.com/news/currencies/bitcoin-miners-energy-costs-oil-gas-inflation-prices-bankruptcy-risk-2022-7>.

terminated for cause based on alleged failure of miner to pay utility bills and hosting fees.<sup>22</sup>

The current Bitcoin market downturn has caused significant liquidations of Bitcoin holdings by cryptocurrency miners, reaching 400 percent of June production, and an overall reduction of 25 percent of Bitcoin holdings.<sup>23</sup> At the current pace of liquidations exceeding production, the impact to miners' operational cash flow may soon lead to a shakeout in the industry as the Bitcoin market price trends toward breakeven production cost. According to one industry insider: "If you factor in overhead costs for infrastructure and interest rates, the total costs for some miners may already be above \$20,000, which is around Bitcoin's current price."<sup>24</sup> The financial stress for many cryptocurrency miners is compounded by nearly \$4 billion in loans, many collateralized by Bitcoin mining machines which have lost nearly half their value, resulting in loans assumed by analysts to now be undercollateralized.<sup>25</sup>

Additional examples of the challenges currently facing the cryptocurrency mining industry abound with operational profitability severely impacted and miners challenged to

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<sup>22</sup> Jesse Coghlan, *Compass Mining loses facility after allegedly failing to pay power bill*, Cointelegraph (Jun. 28, 2022), <https://cointelegraph.com/news/compass-mining-loses-facility-after-allegedly-failing-to-pay-power-bill>.

<sup>23</sup> Stacy Elliott, *What Bitcoin Miners Are Doing to Survive the Bear Market*, Decrypt (Aug. 1, 2022), <https://decrypt.co/106267/what-bitcoin-miners-are-doing-survive-bear-market>.

<sup>24</sup> David Pan, *Almost \$4 Billion in Bitcoin Miner Loans Are Coming Under Stress*, Bloomberg (Jun. 24, 2022), <https://www.bloomberg.com/news/articles/2022-06-24/almost-4-billion-in-bitcoin-miner-loans-are-coming-under-stress#xj4y7vzkg>.

<sup>25</sup> Amy Castor & David Gerard, *Bitcoin mining in the crypto crash – the mining companies' creative accounting*, amycastor.com (Aug. 4, 2022), <https://amycastor.com/2022/08/04/bitcoin-mining-in-the-crypto-crash-the-mining-companies-creative-accounting/>;  
Best Owie, *Bearish Signal: Why Bitcoin Miner Sell-Offs May Continue*, NEWSBTC (Aug. 12, 2022), <https://www.newsbtc.com/news/bitcoin/bearish-signal-why-bitcoin-miner-sell-offs-may-continue/>.

maintain cash flow. In the most recent fiscal quarter, the three largest publicly traded Bitcoin mining companies, Core Scientific, Inc., Marathon Digital Holdings, Inc., and Riot Blockchain Inc., collectively posted losses exceeding \$1 billion for the second quarter of 2022.<sup>26</sup> Another Bitcoin miner, Stronghold Digital Mining (SDIG), recently sold nearly two-thirds of its mining machines (26,200 machines) to cancel \$67.4 million in debt. In that case, SDIG was better off than many of its peers, however, as it is a vertically integrated cryptocurrency miner that also owns and operates approximately 165 megawatts (“MW”) of power generation capacity, finding it more economical to resell the 100 MW of spare generation capacity into the energy market than use it to mine Bitcoin.<sup>27</sup>

Beyond impacts from the protracted decline in Bitcoin prices from the all-time high, an upcoming transition to a thousand-fold more energy efficient consensus mechanism (authentication method) of the second largest by market capitalization cryptocurrency, Ethereum, has the potential to have broad impacts across the cryptocurrency mining space. Currently, both Bitcoin and Ethereum utilize energy intensive proof-of-work consensus mechanisms, however, on September 15 or 16, the Ethereum “merge” is scheduled to occur, transitioning Ethereum from proof-of-work to a proof-of-stake consensus mechanism.<sup>28</sup> The dramatic reduction in energy requirement to mine

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<sup>26</sup> David Pan, *Largest Bitcoin Miners Lost Over \$1 Billion During Crypto Crash*, Bloomberg (Aug. 16, 2022), <https://www.bloomberg.com/news/articles/2022-08-16/largest-bitcoin-miners-lost-over-1-billion-during-crypto-crash>.

<sup>27</sup> Mark Tyson, *Bitcoin Mining Company Sells 26,200 Rigs to Eliminate \$67M Debts*, Tom’s Hardware (Aug. 18, 2022), <https://www.tomshardware.com/news/bitcoin-mining-company-sells-rigs-to-eliminate-67m-usd-debt>.

<sup>28</sup> Richard Lawler, *Ethereum’s big proof-of-stake blockchain switch could happen on September 15<sup>th</sup>*, The Verge (Aug. 11, 2022), <https://www.theverge.com/2022/8/11/23301638/ethereum-crypto-blockchain-proof-of-stake-environment>.

Ethereum using the proof-of-stake consensus mechanism has the potential to disrupt the cryptocurrency mining industry, garnering headlines such as “Ethereum’s ‘Merge’ is about to put every ether miner out of work,”<sup>29</sup> and “Ethereum Miners Will Have Few Good Options After The Merge.”<sup>30</sup> While most directly impacting Ethereum miners, the dramatic reduction in energy consumption by Ethereum will eliminate one of cryptocurrency’s greatest criticisms, the amount of energy consumed and the associated power generation emissions by the mining process.<sup>31</sup> With the potential to be a less environmentally impactful cryptocurrency, proof-of-stake Ethereum may drive either more broad adoption of Ethereum over Bitcoin, or a push for Bitcoin to also evaluate the proof-of-state consensus mechanism, either outcome reducing electricity demand of Bitcoin mining, which might result in stranded generation and transmission investment made in support of current Bitcoin mining load.

Schedule 20’s marginal energy rates and load interruption during Idaho Power’s peak load periods prudently addresses and/or minimizes the potential investment necessary to accommodate a volatile industry, investment which may not be recovered from customers whose load is transitory. Cryptocurrency mining’s growing demand on the electrical system continues to result in additional costs<sup>32</sup> or restrictions in mining

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<sup>29</sup> Timothy B. Lee, *Ethereum’s “Merge” is about to put every ether miner out of work*, ARS Technica (Aug. 8, 2022), <https://arstechnica.com/tech-policy/2022/08/the-merge-the-biggest-change-in-ethereum-history-explained/><https://arstechnica.com/tech-policy/2022/08/the-merge-the-biggest-change-in-ethereum-history-explained/>.

<sup>30</sup> Colin Harper, *Ethereum Miners Will Have Few Good Options After The Merge*, Forbes (Aug. 21, 2022), <https://www.forbes.com/sites/colinharper/2022/08/21/ethereum-miners-will-have-few-good-options-after-the-merge/?sh=5a1d4f04407a>.

<sup>31</sup> Gian M. Volpicelli, *Ethereum’s ‘Merge’ Is a Big Deal for Crypto—and the Planet*, Wired (Aug. 18, 2022), <https://www.wired.com/story/ethereum-merge-big-deal-crypto-environment/>.

operations in countries around the world,<sup>33</sup> and has garnered the interest of the U.S. Senate to better understand and track the growing energy use of the industry.<sup>34</sup> Idaho Power is not alone in recognizing that cryptocurrency mining creates new impacts and risks to the electrical system, and that additional oversight or operational parameters may be required.

#### **IV. CONCLUSION**

In initiating this proceeding, the Company was driven by a desire to provide electric service to HDL customers while also addressing the challenges resulting from the distinctive usage characteristics of HDL customers in order to insulate other customers from their impact. As demonstrated by Idaho Power herein and throughout this proceeding, HDL customers are indeed a distinct customer class whose electric use is characterized by certain attributes, paramount of which is transience, that justify the different rates and charges implemented through Schedule 20. The Commission's decision approving the establishment of Schedule 20 conforms with Idaho law and is consistent with prior Commission orders, and Idaho Power, therefore, respectfully requests the Commission affirm its original decision set forth in Order No. 35428.

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<sup>32</sup> Sergio Goschenko, *National Power Administration Will Propose a Special Cryptocurrency Mining Fee in Paraguay*, Bitcoin.com (Aug. 4, 2022), <https://news.bitcoin.com/national-power-administration-will-propose-a-special-cryptocurrency-mining-fee-in-paraguay/>.

<sup>33</sup> Lubomir Tassev, *Kosovo Renews Crypto Mining Ban Amid Rising Energy Prices*, Bitcoin.com (Aug. 5, 2022), <https://news.bitcoin.com/kosovo-renews-crypto-mining-ban-amid-rising-energy-prices/>.

<sup>34</sup> Robert Walton, *Sen. Warren leads lawmakers calling for DOE, EPA to track 'disturbing' Bitcoin, Ethereum energy use*, Utility Dive (Jul. 19, 2022), <https://www.utilitydive.com/news/warren-lawmakers-doe-epa-bitcoin-energy-use-emissions/627554/>; Press Release, Environmental Working Group, *EWG applauds cryptocurrency energy use oversight provision in Senate digital assets bill*, EWG.org (Aug. 4, 2022), <https://www.ewg.org/news-insights/news-release/2022/08/ewg-applauds-cryptocurrency-energy-use-oversight-provision>.

Respectfully submitted this 24th day of August 2022.

*Megan Goicoechea Allen*

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MEGAN GOICOECHEA ALLEN  
Attorney for Idaho Power Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 24th day of August 2022, I served a true and correct copy of the foregoing Idaho Power Company's Comments on Reconsideration upon the following named parties by the method indicated below, and addressed to the following:

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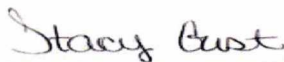
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