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IDAHO PUBLIC
UTILITIES COMMISSION

MEGAN GOICOECHEA-ALLEN
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December 28, 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-22-30
Application of Idaho Power Company for Authority to Establish Compensation for the Mandatory Interruption Requirement of Schedule 20 - Speculative High-Density Load

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Application 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

Megan Goicoechea-Allen

MGA:sg

Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR AUTHORITY TO ESTABLISH COMPENSATION FOR THE MANDATORY INTERRUPTION REQUIREMENT OF SCHEDULE 20 - SPECULATIVE HIGH-DENSITY LOAD.	)	CASE NO. IPC-E-22-30 APPLICATION

Idaho Power Company ("Idaho Power" or "Company") respectfully applies to the Idaho Public Utilities Commission ("Commission") pursuant to *Idaho Code* § 61-502, Commission Rule of Procedure[1] 52, and Order No. 35550,[2] for an order to either: (1) establish interruption compensation for Schedule 20 – Speculative High-Density Load ("Schedule 20") of $0.0734 per kilowatt ("kW") per hour of interruption for Large General Service Rates, and $0.0835 per kW per hour of interruption for Large Power Service

[1] Hereinafter cited as RP.
[2] *In the Matter of the Application of Idaho Power Company for Authority to Establish New Schedule to Serve Speculative High-Density Load Customers*, Case No. IPC-E-21-37, Order No. 35550, p. 23 (Oct. 5, 2022).

Rates, or alternatively, (2) defer implementation of any compensation structure for the mandatory interruption requirement of Schedule 20 until evaluation of cost assignment responsibility for Schedule 20 is completed at a general rate case.

In support of this Application Idaho Power represents as follows:

I INTRODUCTION

1. Schedule 20 provides, in pertinent part, that Idaho Power can interrupt service during high-demand times in the summer to alleviate the strain placed on the system by HDL customers. In accordance with the Commission's directive in Order No. 35550, the Company seeks a determination by the Commission of a fair, just, and reasonable amount of compensation, if any, for interruptibility under Schedule 20.

2. As explained in the preceding case[3] and more fully described herein, Idaho Power is concerned that direct compensation offered to Schedule 20 customers for mandatory interruption may not represent the best method of recognizing the economic value that may exist when load interruption of Schedule 20 customers serves to relieve the strain on Idaho Power's system, a strain caused in part by this class's own potential for significant on-peak consumption of energy. Additionally, until cost assignment reflects system utilization by Schedule 20 as evaluated during a general rate case, there is risk that interruption compensation may over-compensate for any system benefits derived from that interruption.

If the Commission, nevertheless, determines it is appropriate to compensate Schedule 20 customers for mandatory interruption prior to evaluation of cost assignment at a general rate case, the Company proposes any interim interruption compensation be reflective of the same cost basis currently included in Schedule 20 rates. Because

[3] Case No. IPC-E-21-37.

Schedule 20 interruption parameters were determined to address the need for a peaking resource, the existing cost of a peak-load service resource reflected in Schedule 9 and 19 rates could serve as an appropriate interim basis for interruption compensation. That is, the Company believes that an appropriate interim compensation structure for Schedule 20 would be to allow Schedule 20 customers to avoid some, or all, of the base rate charges intended to recover the cost of the Company's peak-serving resources based on the timing and frequency of interruption.

3. If the Commission determines that interim direct interruption compensation is appropriate, the Company further proposes interruption compensation costs be recoverable as a power supply expense through the Power Cost Adjustment ("PCA") at 100 percent, similar to incentives paid to customers under Idaho Power's demand response programs. It should be noted that because the PCA does not apply to energy sales under Schedule 20, a Schedule 20 customer will avoid paying the cost of those incentives, which will otherwise be borne by the broader customer base.

4. As recommended by Staff,[4] and adopted by the Commission,[5] the Company agreed that evaluation and comparison of methods other than Demand-Side Management Avoided Cost Averages for setting the Schedule 20 energy rates should be completed prior to filing the Company's next general rate case. This evaluation is critical to ensure that referenced marginal prices best reflect costs the Company is actually incurring and are recovered through the PCA, which would not be collectable from Schedule 20 as the PCA rate does not apply to Schedule 20 energy sales. Idaho Power looks forward to beginning those discussions with Staff in the next few months.

[4] Case No. IPC-E-21-37, Staff Comments, p. 6.
[5] Case No. IPC-E-21-37, Order No. 35428, p. 7. (June 15, 2022).

II BACKGROUND

5. In the summer of 2021, Idaho Power received inquiries from cryptocurrency mining operations reflecting prospective customer interest of approximately 1,950 megawatts ("MW"). Subsequently, on November 4, 2021, Idaho Power filed an application to establish a new customer classification applicable to customers operating in a speculative industry and approval of a new rate schedule, Schedule 20, to serve these customers.

6. The Company's application was prompted by the recognition that if even a fraction of the prospective customer interest from cryptocurrency mining operations ultimately interconnected to Idaho Power's system, the additional load would exceed the Company's ability to serve total system load during the summer season without additional investment in capacity resources.[6]

7. The Company was also concerned with the risk that potential future investment in capacity resources to meet Schedule 20 customer demand may ultimately become stranded when the economics of cryptocurrency mining changed, which would result in a cost-shift to all Idaho Power customers. To mitigate that risk while meeting its obligation to reliably serve all customers, the Company proposed to implement Schedule 20, which includes a requirement for mandatory interruption at Idaho Power's discretion under the following parameters:

- June 15 through September 15
- 1:00 p.m. to 11:00 p.m. Monday through Friday, excluding Holidays
- Maximum ten (10) hours per interruption event
- Up to 225 hours annually

[6] *Id.,* Application, p. 1 (Nov. 4, 2021).

8. The Commission approved the Company's Application as filed on June 15, 2022, under Order No. 35428. A Petition for Reconsideration subsequently filed by GeoBitmine LLC, was ultimately denied on October 5, 2022, when the Commission issued Order No. 35550 affirming their approval of the creation of Schedule 20.

9. While the Commission found the record sufficient to support the interruptibility component of Schedule 20, it did not believe it had sufficient evidence to determine if compensation for mandatory interruption is required.[7] As a result, the Commission found that "the use of Schedule's 20 interruptability provision is conditioned on a subsequent Commission determination of an amount, if any, that is fair, just, and reasonable,"[8] and therefore directed Idaho Power "to apply to the Commission for a determination of a fair, just, and reasonable amount of compensation, if any, for interruptability under Schedule 20."[9]

10. Pursuant to the Commission's mandate, the Company is proposing an interruptibility compensation recommendation for the Commission's consideration. The Company is also proposing an alternative for the Commission's consideration:

- Section IV provides the primary recommendation, which, in recognition of the existing costs recovered in Schedule 20's current rates and consistent with Schedule 20 parameters designed to avoid the cost of a peaking resource, offers interruption compensation at the value of avoiding the embedded peak-load service resource costs currently included in the rates for Schedule 9 – Large General Service, and Schedule 19 – Large Power Service, which serve as the basis for Schedule 20 rates.

[7] Order No. 35550, p. 22.
[8] *Id.*, p. 22-23.
[9] *Id.*, p. 23.

- In the alternative, Section III below discusses an approach where compensation for interruption would not be immediately provided, rather evaluated at a future general rate case. This approach recognizes that compensation is best determined in the future once full cost assignment for Schedule 20's utilization of Idaho Power's system is reflected in Schedule 20 rates.

III. SYSTEM COST EVALUATION PRECEDES INTERRUPTION COMPENSATION

11. The circumstances that drove the need and purpose of the interruptibility provisions within Schedule 20 warrant separate and distinct consideration from the compensation method applied to the Company's current demand response programs to avoid inappropriate over-compensation for Schedule 20 customers. Idaho Power offers three demand response programs to Residential, Commercial & Industrial, and Irrigation customers under Schedule 81 – Residential Air Conditioner Cycling Program, Schedule 82 - Flex Peak Program, and Schedule 23 – Irrigation Peak Rewards Program. The three demand response programs are voluntary offerings and compensate customers for actual or nominated customer load curtailment.

12. To prevent double crediting for customer load curtailment, when cost assignment is completed for demand response participating customer classes, the first step in the process is to remove the impact of any demand response event from the customer class's load characteristics. This step is necessary to first recognize full cost assignment in the respective customer class's electric service rates. Otherwise, without full cost assignment, a customer class will receive load curtailment credit twice, first in reduced cost assignment from lower load characteristics net of the demand response event, and second in the incentive payment for load interruption. The value of load

curtailment must only be recognized once, either in reduced cost assignment, or incentive payment for load curtailment.

13. As of the date of this Application, there are no Schedule 20 customers on Idaho Power's system. Schedule 20 retail rates were developed from the underlying Schedule 9 and Schedule 19 retail rates which would otherwise have been applicable absent the creation of Schedule 20. Schedule 9 and Schedule 19 rates were subject to adjustment for demand response events at the time cost assignment was completed, however, the load characteristics of Schedule 20 customers are likely to differ from either Schedule 9 or 19.

14. High load factor is one of the qualifying criteria for service under Schedule 20. For the purposes of administrating the tariff, the Company considers a threshold of 85 percent or greater annually to meet this criterion.[10] Typical cryptocurrency mining operations must optimize computer processing uptime and generally operate exceeding 90 percent load factor, many at 95 percent or greater load factor. Table 1 below lists the load factor of the underlying Schedule 9 and 19 customer classes which are the current basis of Schedule 20 rates. Schedule 20 customers are likely to operate at load factors well above those of either Schedule 9 or 19, and it is important to recognize that energy comprises approximately 40 percent of a customer class's cost assignment responsibility.

Table 1. Idaho Large Commercial and Industrial Class Average Load Factor

	2021	2020	2019	2018	2017
I09P	63.7%	59.3%	60.2%	61.5%	60.1%
I09T	34.2%	32.4%	36.4%	32.2%	32.5%
I19P	82.1%	81.2%	80.8%	81.0%	81.2%
I19T	79.0%	78.5%	81.9%	81.8%	82.7%

[10] Case No. IPC-E-21-37, Idaho Power Company's Comments on Reconsideration, p. 7.

15. As load factor increases, it is probable a customer class with 95 percent load factor will have higher coincidence to Idaho Power's system peak than classes operating at lower load factors. Should Schedule 20, operating at load factors above Schedule 9 and 19, have coincidence to Idaho Power's peak above Schedule 9 or 19, this would result in higher cost assignment for Schedule 20. Coincidence to system peak is responsible for approximately one-third of a customer class's cost assignment responsibility. There is likelihood that both energy use and coincidence to system peak of Schedule 20 exceeds Schedule 9 and 19, two system utilization statistics which comprise nearly 75 percent of class cost assignment.

16. Based on the foregoing factors, Idaho Power offers an alternative recommendation to the Commission such that compensation for the mandatory interruption requirement of Schedule 20 is determined once Schedule 20 customers are part of Idaho Power's system, and evaluation of cost assignment responsibility for Schedule 20 is completed at a general rate case. This limits the potential that all Idaho Power customers over-compensate Schedule 20 customers for interruption when the electric service rates of Schedule 20 do not yet fully reflect the class's system utilization. Idaho Power would evaluate the statistical characteristics of a future Schedule 20 cohort, such as, but not limited to, a coefficient of variation being one or less, once Schedule 20 customers are part of the system. This will ensure the Company can validate the count and magnitude of customers to ensure it is sufficient to complete class cost assignment at a general rate case.

IV. INTERRUPTION COMPENSATION IN RECOGNITION OF CURRENT COSTS EMBEDDED IN RATES

17. If the Commission determines it is appropriate to compensate Schedule 20 customers for mandatory interruption prior to evaluation of cost assignment at a general rate case, the Company proposes interruption compensation should be based on the same cost basis as what is included in Schedule 20 rates today. As Schedule 20 interruption parameters were determined to address the need for a peaking resource, the existing cost of a peak-load service resource in Schedule 9 and 19 rates is the appropriate basis for interruption compensation. That is, the Company believes that an appropriate interim compensation structure for Schedule 20 would be to allow Schedule 20 customers to avoid some, or all, of the base rate charges intended to recover the cost of the Company's peak-serving resources based on the timing and frequency of interruption.

18. Idaho Power evaluated the cost-of-service cost assignment for peak-load functionalized costs under Schedule 9 and 19 at the time of the 2011 general rate case and adjusted that cost assignment on a per kW basis for all subsequent revenue requirement filings which resulted in an increase or decrease to capacity-classified generation plant costs. For Schedule 9, embedded in existing rates is recovery of $16.51 per kW annually for the cost of peak-load functionalized costs, and for Schedule 19 this amount is $18.79 per kW annually.

19. Schedule 20 interruption parameters include the potential for up to 225 hours of annual interruption. Interruption compensation is determined by dividing the annual peak load functionalized per kW cost by the total potential hours of interruption. For each hour of interruption, compensation for Schedule 20 Large General Service customers, rates developed from Schedule 9 rates, are proposed to be compensated $0.0734 per kW per hour of interruption ($16.51 divided by 225 hours). For Schedule 20

Large Power Service customers, rates developed from Schedule 19 rates, are proposed to be compensated $0.0835 per kW per hour of interruption ($18.79 divided by 225 hours). Attachment 1 to this Application is the work paper supporting the calculation of interruption compensation rates. At the full 225 hours of interruption, the compensation offered to Schedule 20 customers would represent approximately 25 percent of the annual collections from the schedule's Billing Demand charge and Basic Load Capacity charge. Attachment 2 to this Application is the revised Schedule 20 tariff if interruption compensation is included.

20. Measurement of load reductions from interruption events would follow a similar basis as the Company's existing methodology utilized for the Flex Peak Program. This includes developing a baseline measurement of the highest three energy usage days from a 10-day period, as well as a Day-of-Adjustment ("DOA") determination to arrive at an adjusted baseline. The DOA is necessary to address situations where load is lower or higher than it has historically been, and the baseline does not accurately reflect the load behavior immediately prior to the knowledge of an interruption event.

V. COMMUNICATIONS AND SERVICE OF PLEADINGS

21. While the Company is not aware of any existing customers who would qualify for Schedule 20, this Application will be brought to the attention of prospective Schedule 20 customers seeking to site in Idaho Power's service area as requests for service are received. Additionally, Idaho Power has served the three entities that participated in Case No. IPC-E-21-37 with a copy of this Application. Idaho Power will also keep its Application open for public inspection at its offices throughout the state of Idaho. Idaho Power believes these efforts will provide appropriate notice to ventures likely to be impacted by the Company's Application; 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. Communications and service of pleadings with reference to this Application should be sent to the following:

Megan Goicoechea Allen
Lisa D. Nordstrom
Idaho Power Company
1221 West Idaho Street (83702)
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pgoralski@idahopower.com

VI. MODIFIED PROCEDURE

23. Idaho Power believes that it would be appropriate to process this case by means of Modified Procedure (i.e., by written submissions rather than by hearing) in accordance with the provisions of RP 201-210 *et seq.*

VII. CONCLUSION

24. Idaho Power respectfully requests that the Commission issue an order prior to the start of the June 15 – September 15 interruption period either: (1) establishing interruption compensation for Schedule 20 of $0.0734 per kW per hour of interruption for Large General Service Rates, and $0.0835 per kW per hour of interruption for Large Power Service Rates, **or** alternatively, (2) defer approving a compensation structure for the mandatory interruption requirement of Schedule 20 until evaluation of cost assignment responsibility for Schedule 20 is completed at a general rate case.

DATED at Boise, Idaho, this 28th day of December 2022.

MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 28th day of December 2022, I served a true and correct copy of Idaho Power Company's Application upon the following named parties by the method indicated below, and addressed to the following:

GeoBitmine LLC
Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th Street
P.O. Box 7218
Boise, Idaho 83702

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
____FTP Site
__X__Email peter@richardsonadams.com

Industrial Customers of Idaho Power
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Richardson Adams, PLLC
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____FAX
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2140 Labs LLC
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____FAX
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Stacy Gust

Stacy Gust, Regulatory Administrative Assistant

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E-22-30

IDAHO POWER COMPANY

ATTACHMENT NO. 1

WORKPAPER

	A	B	C	D	E	F	G	H	I	J	K	L
1	**IPC-E-22-30 - Attachment 1 - Large General Service Interruption Rate Workpaper**											
2												
3		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
4												
5		"Unit Cost by Schedule"	Class COS Results	Cap and Spread	Cap and Spread		OATT Deferral		Depreciation Study		Boardman	
6		Row Numbers	per Stipulation	Uniform	Adjusted	GRC	as approved	OATT Deferral	per Stipulation	Depr Study	Approved	Boardman
7		from FC Model	Case No. IPC-E-11-08	Adjustment	Revenue Requirement	$/kWh	Case No. IPC-E-12-06	$/kWh	Case No. IPC-E-12-08	$/kWh	Case No. IPC-E-12-09	$/kWh
8												
9												
10												
11	Production											
12	**Demand - Total**		**$5,358,310**	**-2.26%**	**$5,237,039**	**$20.20722**		**$0.00000**	**($8,915.86)**	**($0.03209)**	**$14,724**	**$0.05299**
13	Demand - BNS				$3,062,190	$11.81552		$0.00000	($5,213.26)	($0.01876)	$8,609	$0.03099
14	Demand - BS				$1,084,705	$4.18536		$0.00000	($1,846.67)	($0.00665)	$3,050	$0.01098
15	*Demand - Peak*				*$1,090,145*	*$4.20634*		*$0.00000*	*($1,855.93)*	*($0.00668)*	*$3,065*	*$0.01103*
16	9P & 9T Summer Demand (kW)					259,167		277,835		277,835		277,835
17												
18	**Proportions from 2011 GRC**											
19	DEMAND - Base-load Non-Summer		3,133,099	**58%**								
20	DEMAND - Base-load Summer		1,109,823	**21%**								
21	DEMAND - Peak		1,115,388	**21%**								
22	Total		5,358,310	**100%**								
23												
24	Columns	5	7, 9, 11, 13	17	19	21	23	26	28	30	32	
25	**Update**	**GRC 2011**	**OATT Depr Board AMI**	**Langley**	**NPSE**	**Valmy**	**Tax Reform**	**Valmy**	**Boardman**	**Boardman**	**Bridger**	
26	9P Summer Demand	257,168	275,524	275,524	311,166	317,482	350,199	371,892	376,368	371,535	419,917	
27	9T Summer Demand	1,999	2,311	2,311	1,340	2,760	3,582	3,698	3,698	3,455	3,376	
28	**Total Demand**	**259,167**	**277,835**	**277,835**	**312,506**	**320,242**	**353,781**	**375,590**	**380,065**	**374,990**	**423,293**	
29												
30	Total Demand-Peak $/kW	$5.5045										
31	Annual Collection $/kW	$16.51										
32	**Interruption Compensation**	**$ 0.0734**										

	M	N	O	P	Q	R	S	T	U	V	W
1	**IPC-E-22-30 - Attachment 1 - Large General Service Interruption Rate Workpaper**										
2											
3	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	(21)	
4											
5	Remove Accel Depr		Langley Gulch	Cap and Spread	Cap and Spread		NPSE		Valmy 2019/2025		Sum of
6	for Non-AMI Meters	Non-AMI Depr	per Stipulation	Uniform	Adjusted	Langley	as Approved	NPSE	per Stipulation	Valmy	All Components
7	Case No. IPC-E-12-07	$/kWh	Case No. IPC-E-12-14	Adjustment	Revenue Requirement	$/kWh	Case No. IPC-E-13-20	$/kWh	Case No. IPC-E-16-24	$/kWh	pre-Tax Reform
8											
9											
10											
11											
12		**$0.00000**	**$ 489,920**	**-11.82%**	**$432,009**	**$1.55491**	**$ 1,322,952**	**$4.23336**	**$ 138,420**	**$0.43224**	**$ 7,136,228**
13		$0.00000			$252,603	$0.90918	$ 773,553	$2.47532	$ 80,937	$0.25274	
14		$0.00000			$89,478	$0.32206	$ 274,012	$0.87682	$ 28,670	$0.08953	
15		*$0.00000*			*$89,927*	*$0.32367*	*$ 275,386*	*$0.88122*	*$ 28,814*	*$0.08997*	
16		277,835				277,835		312,506		320,242	
17											
18											
19											
20											
21											
22											
23											
24											
25											
26											
27											
28											
29											
30											
31											
32											

	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI
1	**IPC-E-22-30 - Attachment 1 - Large General Service Interruption Rate Workpaper**											
2												
3	(22)	(23)	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)		
4												
5	Tax Reform		Valmy 2019 Adj		Boardman		Boardman		Bridger			
6	per Stipulation	Tax Reform	As Approved	Valmy	Approved	Boardman	Approved	Boardman	Approved	Bridger		
7	Case No. GNR-U-18-01	$/kWh	Case No. IPC-E-19-08	$/kWh	Case No. IPC-E-19-32	$/kWh	Case No. IPC-E-20-32	$/kWh	Case No. IPC-E-21-17	$/kWh		
8												
9												
10												
11												
12	**$ (159,043)**	**($0.44955)**	**$ 14,435**	**$0.03843**	**$ (12,816)**	**($0.03372)**	**$ (47,549)**	**($0.12680)**	**$ 239,903**	**$0.56675**	$7,171,157	Demand
13	$ (92,995)	($0.26286)	$ 8,440	$0.02247	$ (7,494)	($0.01972)	$ (27,803)	($0.07414)	$ 140,276	$0.33139		
14	$ (32,941)	($0.09311)	$ 2,990	$0.00796	$ (2,655)	($0.00698)	$ (9,848)	($0.02626)	$ 49,689	$0.11739		
15	*$ (33,106)*	*($0.09358)*	*$ 3,005*	*$0.00800*	*$ (2,668)*	*($0.00702)*	*$ (9,898)*	*($0.02640)*	*$ 49,938*	*$0.11798*	*$5.5045*	*Peak $/kW*
16		353,781		375,590		380,065		374,990		423,293		
17												
18												
19												
20												
21												
22												
23												
24												
25												
26												
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29												
30												
31												
32												

	A	B	C	D	E	F	G	H	I	J	K
1	**IPC-E-22-30 - Attachment 1 - Large Power Service Interruption Rate Workpaper**										
2											
3			Class COS Results	Cap and Spread	Cap and Spread		Depreciation Study		Boardman		Langley Gulch
4			per Stipulation	Uniform	Adjusted	GRC	per Stipulation	Dep Study	Approved	Boardman	per Stipulation
5		% of Total	Case No. IPC-E-11-08	Adjustment	Revenue Requirement	$/kW	Case No. IPC-E-12-08	$/kW	Case No. IPC-E-12-09	$/kW	Case No. IPC-E-12-14
6											
7	Production										
8	*Demand - BNS*	*16.2%*	*$13,849,618*	*1.26%*	*$14,024,182*		*-$22,539*		*$33,489*		*$1,291,616*
9	*Demand - BS*	*5.8%*	*$4,951,199*	*1.26%*	*$5,013,605*		*-$8,058*		*$11,972*		*$461,749*
10	***Demand - Peak***	***5.8%***	***$4,963,798***	***1.26%***	***$5,026,363***	***$4.67***	***-$8,078***	***($0.01)***	***$12,003***	***$0.01***	***$462,924***
11	Demand	27.8%	$23,764,616	1.26%	$24,064,150		-$38,675		$57,464		$2,216,289
12	Energy	49.6%	$42,335,731	1.26%	$42,869,340						
13											
14	Transmission										
15	Demand	12.3%	$10,509,627	1.26%	$10,642,093						
16											
17	Distribution										
18	Demand & Cust	14.9%	$12,757,716	1.26%	$12,918,517						
19					$0						
20											
21	Other										
22	Customer	-5.0%	-$4,240,987	1.26%	-$4,294,441						
23	Energy	0.3%	$293,639	1.26%	$297,340						
24											
25	**Total** *(or Summer kW units (S/P/T)*	**100.0%**	**$85,420,342**	**86,496,998**	**$86,496,998**	**1,076,402**	**(139,014)**	**1,046,347**	**159,833**	**1,046,347**	**7,998,686**
26											
27	Demand Subtotal Check	OK	OK		OK		OK		OK		OK
28											
29	**Update**	**GRC 2011**	**OATT Depr Board AMI**	**Langley**	**NPSE**	**Valmy**	**Tax Reform**	**Valmy**	**Boardman**	**Boardman**	**Bridger**
30	19S Summer Demand	3,132	3,056	3,056	3,051	3,149	2,904	3,012	3,012	3,036	-
31	19P Summer Demand	1,051,491	1,021,980	1,021,980	1,078,635	1,090,177	1,119,510	1,096,543	1,125,841	1,150,102	1,181,641
32	19T Summer Demand	21,779	21,311	21,311	16,956	15,219	14,778	14,463	14,733	14,562	14,925
33	**Total Demand**	**1,076,402**	**1,046,347**	**1,046,347**	**1,098,642**	**1,108,545**	**1,137,191**	**1,114,018**	**1,143,586**	**1,167,699**	**1,196,567**
34											
35											
36	Total Demand-Peak $/kW	$6.2644									
37	Annual Collection $/kW	$18.79									
38	**Interruption Compensation**	**$ 0.0835**									

	L	M	N	O	P	Q	R	S	T	U	V	W	X
1	**IPC-E-22-30 - Attachment 1 - Large Power Service Interruption Rate Workpaper**												**IPC-E-22-30 - A**
2													
3	Cap and Spread	Cap and Spread		NPSE		Valmy 2019/2025		Tax Reform		Valmy 2019 Adj		Boardman	
4	Uniform	Adjusted	Langley	as Approved	NPSE	per Stipulation	Valmy	per Stipulation	Tax Reform	As Approved	Valmy	Approved	Boardman
5	Adjustment	Revenue Requirement	$/kW	Case No. IPC-E-13-20	$/kW	Case No. IPC-E-16-24	$/kW	Case No. GNR-U-18-01	$/kW	Case No. IPC-E-19-08	$/kW	Case No. IPC-E-19-32	$/kW
6													
7													
8	*-25.86%*	*$957,588*		*$3,584,319*		*$318,346*		*-$375,259*		*$28,621*		*-$25,917*	
9	*-25.86%*	*$342,335*		*$1,281,384*		*$113,808*		*-$134,154*		*$10,232*		*-$9,265*	
10	***-25.86%***	***$343,206***	***$0.33***	***$1,284,645***	***$1.17***	***$114,097***	***$0.10***	***-$134,496***	***($0.12)***	***$10,258***	***$0.01***	***-$9,289***	***($0.01)***
11	-25.86%	$1,643,130		$6,150,348		$546,251		-$643,909		$49,111		-$44,471	
12												-$79,223	
13													
14													
15													
16													
17													
18													
19													
20													
21													
22													
23													
24													
25	**5,930,129**	**$1,643,130**	**1,046,347**	**15,810,663**	**1,098,642**		**1,108,545**	**(2,182,754)**	**1,137,191**	**138,991**	**1,114,018**	**(123,694)**	**1,143,586**
26													
27		OK		OK		OK		OK		OK		OK	
28													
29													
30													
31													
32													
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34													
35													
36													
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38													

	Y	Z	AA	AB	AC	AD
1	**Attachment 1 - Large Power Service Interruption Rate Workpaper**					
2						
3	Boardman		Bridger			
4	Approved	Boardman	Approved	Bridger		
5	Case No. IPC-E-20-32	$/kW	Case No. IPC-E-21-17	$/kW		
6						
7						
8	*-$96,419*		*$459,388*			
9	*-$34,469*		*$164,230*			
10	***-$34,557***	***($0.03)***	***$164,648***	***$0.14***	$6.26	*Peak $/kW*
11	-$165,445		$788,265			
12	-$294,734		$1,404,263			
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25	**(460,179)**	**1,167,699**	**2,192,528**	**1,196,567**		
26						
27	OK		OK			
28						
29						
30						
31						
32						
33						
34						
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36						
37						
38						

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E-22-30

IDAHO POWER COMPANY

ATTACHMENT NO. 2

SCHEDULE 20
(CLEAN AND LEGISLATIVE)

SCHEDULE 20
SPECULATIVE HIGH-DENSITY LOAD
(Continued)

INTERRUPTION COMPENSATION

Fixed Capacity Reduction Rate:

Large General Service Rates	**$0.0734 per kilowatt of reduction per event hour**
Large Power Service Rates	**$0.0835 per kilowatt of reduction per event hour**

DEFINITIONS

Actual kW Reduction. The kilowatt (kW) reduction during an Interruption Event, which is the difference between a Participant's hourly average kW measured at the Facility Site's meter and the corresponding hour of the Adjusted Baseline kW.

Adjusted Baseline kW. The Original Baseline kW plus or minus the "Day of" Load Adjustment amount.

"Day of" Load Adjustment. The difference between the Original Baseline kW and the actual metered kW during the hour prior to the Participant receiving notification of an event. Scalar values will be calculated by dividing the Original Baseline kW for each Interruption Event hour by the Baseline kW of the hour preceding the event notification time. The scalars are multiplied by the actual event day kW for the hour preceding the event notification time to create the Adjusted Baseline kW from which load reduction is measured. The Adjusted Baseline kW for each hour will be capped at 120% of the maximum kW amount for any hour from the Highest Energy Use Days or the hours during the event day prior to event notification.

Facility Site(s). All of a Participant's facility or equipment that is metered from a single service location that a Participant has taken service under Schedule 20.

Highest Energy Usage Days. The three days out of the immediate past 10 non-event Business Days that have the highest sum total kW as measured across the Interruption Event daily parameters.

Interruption Compensation. The Actual kW Reduction for each hour multiplied by the Fixed Capacity Reduction Rate. Participants are paid based on the average event kilowatt reduction.

Load Control Device. Refers to any technology, device, or system utilized under Schedule 20 to enable the Company to initiate the Interruption Event.

Interruption Event. Refers to an event where the Company requests or calls for interruption of specific loads with the use of one or more Load Control Devices.

Original Baseline kW. The arithmetic mean (average) kW of the Highest Energy Usage Days during the Interruption Event daily parameters, calculated for each Facility Site for each hour.

SCHEDULE 20
SPECULATIVE HIGH-DENSITY LOAD
(Continued)

INTERRUPTION COMPENSATION

Fixed Capacity Reduction Rate:

Large General Service Rates	**$0.0734 per kilowatt of reduction per event hour**
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DEFINITIONS

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"Day of" Load Adjustment. The difference between the Original Baseline kW and the actual metered kW during the hour prior to the Participant receiving notification of an event. Scalar values will be calculated by dividing the Original Baseline kW for each Interruption Event hour by the Baseline kW of the hour preceding the event notification time. The scalars are multiplied by the actual event day kW for the hour preceding the event notification time to create the Adjusted Baseline kW from which load reduction is measured. The Adjusted Baseline kW for each hour will be capped at 120% of the maximum kW amount for any hour from the Highest Energy Use Days or the hours during the event day prior to event notification.

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