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Wednesday, June 21, 2023 10:44:35 AM  
IDAHO PUBLIC  
UTILITIES COMMISSION



MEGAN GOICOECHEA ALLEN  
Corporate Counsel  
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June 21, 2023

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 Reply Comments 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	)	
OF IDAHO POWER COMPANY FOR	)	CASE NO. IPC-E-22-30
AUTHORITY TO ESTABLISH	)	
COMPENSATION FOR THE MANDATORY	)	IDAHO POWER COMPANY'S
INTERRUPTION REQUIREMENT OF	)	REPLY COMMENTS
SCHEDULE 20 - SPECULATIVE HIGH-	)	
DENSITY LOAD.	)	

Idaho Power Company ("Idaho Power" or "Company") respectfully submits the following Reply Comments in response to Comments filed by Staff ("Staff") of the Idaho Public Utilities Commission ("Commission") in the matter of the Company's application to establish compensation for the mandatory interruption requirement of Schedule 20 – Speculative High-Density Load ("Schedule 20").

### I. **REPLY COMMENTS**

**Staff Comments** – Based on its review of the Company's proposals to provide for interruptible compensation for Schedule 20 customers, including comparison to other existing programs and schedules for context, Staff concluded that the Company's

proposal and method for providing and determining interim compensation was fair, just, and reasonable for Schedule 20 customers.<sup>1</sup>

More specifically, Staff reviewed the interim interruption methodology basis of using Schedule 9 and Schedule 19 cost assignment and found that the resulting proposed values for interruptible compensation of \$0.0734 per kilowatt (“kW”) per hour for Large General Service and \$0.0835 per kW per hour for Large Power Service provide a fair estimate that reduces the risk of overcompensation that could harm other customers and can be utilized until data from actual Schedule 20 customers is available. Staff also agreed it was reasonable for Schedule 20 interruption compensation costs to be 100 percent recoverable through the Company’s Power Cost Adjustment (“PCA”) mechanism, considering Idaho Power’s inability to negotiate these rates with individual customers and its obligation to serve.<sup>2</sup>

**Reply Comments** - Idaho Power appreciates the review by Staff in consideration of any interim interruption compensation offered to Schedule 20 for mandatory load interruption and agrees with its recommendations. The Company also agrees with Staff’s assessment that Schedule 20 interruption parameters and rates are best reviewed and determined once Schedule 20 customers are established and data has been collected as part of a general rate case. While actual Schedule 20 customer data is ultimately the most appropriate for determining interruptible parameters and rates, the Company does not currently have any Schedule 20 customers, as noted by the Company in its most recent

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<sup>1</sup> Staff Comments, p. 5

<sup>2</sup> *Id.*

general rate case, Case No. IPC-E-23-11 filed June 1, 2023.<sup>3</sup> As a result, the Company anticipates the analysis would occur in the context of a future general rate case, once Schedule 20 customers are established and can have cost assignment determined as a separate rate class. While not specific to the interruption compensation for Schedule 20, the Company has proposed as part of its pending general rate case to update the marginal energy component basis of Schedule 20 to align with proposed Schedule 9 and 19 time-of-use periods, and to replace the current Demand-Side Management Avoided Cost Average-based marginal rates with AURORA-based marginal rates.<sup>4</sup> The proposed change to an AURORA-based marginal energy rate is based on Staff's recommendation for the Company to evaluate the pricing basis of marginal energy, and ordered by the Commission as part of the Company's case to establish Schedule 20.<sup>5</sup>

## **II. CONCLUSION**

Idaho Power appreciates Staff's review and consideration of the issues in this case and the opportunity to offer these Reply Comments to address Staff's recommendations. Idaho Power respectfully requests that the Commission: (1) approve the proposed interim interruption compensation for Schedule 20 of \$0.0734 per kilowatt ("kW") per hour for Large General Service and \$0.0835 per kW per hour for Large Power Service, and (2) allow for 100 percent recovery of Schedule 20 interim interruptible compensation costs through the PCA.

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<sup>3</sup> *In the Matter of the Application of Idaho Power Company for Authority to Increase Its Rates and Charges for Electric Service in the State of Idaho and for Associated Regulatory Accounting Treatment*, Case No. IPC-E-23-11, Direct Testimony of Pawel Goralski, p. 49-50.

<sup>4</sup> *Id.* at 51.

<sup>5</sup> *In the Matter of the Application of Idaho Power Company for Authority to Establish a New Schedule to Serve Speculative High-Density Load Customers*, Case No. 21-37, Staff Comments, p. 6 (Apr. 12, 2022) and Order No 35428, p. 6-7 (Jun. 15, 2022).

Respectfully submitted this 21st day of June 2023.

A handwritten signature in black ink that reads "Megan Goicoechea Allen". The signature is written in a cursive, flowing style.

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MEGAN GOICOECHEA ALLEN  
Attorney for Idaho Power Company

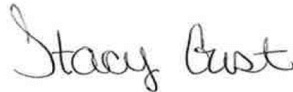
## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 21<sup>st</sup> day of June 2023, I served a true and correct copy of the foregoing Idaho Power Company's Reply Comments upon the following named parties by the method indicated below, and addressed to the following:

**Commission Staff**

Michael Duval  
Deputy Attorney General  
Idaho Public Utilities Commission  
P.O. Box 83720  
11331 West Chinden Blvd, Bldg 8  
Suite 201-A  
Boise ID 83714

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☐ FTP Site  
☒ E-mail  
[Michael.duval@puc.idaho.gov](mailto:Michael.duval@puc.idaho.gov)



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Stacy Gust, Regulatory Administrative  
Assistant