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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO ACQUIRE RESOURCES TO BE ONLINE BY 2024 AND FOR APPROVAL OF A POWER PURCHASE AGREEMENT WITH FRANKLIN SOLAR LLC.	)	CASE NO. IPC-E-23-05

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

JARED L. ELLSWORTH

Q. Please state your name, business address, and present position with Idaho Power Company ("Idaho Power" or "Company").

A. My name is Jared L. Ellsworth and my business address is 1221 West Idaho Street, Boise, Idaho 83702. I am employed by Idaho Power as the Transmission, Distribution & Resource Planning Director for the Planning, Engineering & Construction Department.

Q. Please describe your educational background.

A. I graduated in 2004 and 2010 from the University of Idaho in Moscow, Idaho, receiving a Bachelor of Science Degree and Master of Engineering Degree in Electrical Engineering, respectively. I am a licensed professional engineer in the State of Idaho.

Q. Please describe your work experience with Idaho Power.

A. In 2004, I was hired as a Distribution Planning engineer in the Company's Delivery Planning department. In 2007, I moved into the System Planning department, where my principal responsibilities included planning for bulk high-voltage transmission and substation projects, generation interconnection projects, and North American Electric Reliability Corporation's ("NERC") reliability compliance standards. I transitioned into the Transmission Policy & Development group with a similar

role, and in 2013, I spent a year cross-training with the Company's Load Serving Operations group. In 2014, I was promoted to Engineering Leader of the Transmission Policy & Development department and assumed leadership of the System Planning group in 2018. In early 2020, I was promoted into my current role as the Transmission, Distribution and Resource Planning Director. I am currently responsible for the planning of the Company's wires and resources to continue to provide customers with cost-effective and reliable electrical service.

Q. What is the purpose of your testimony in this case?

A. The purpose of my testimony is to inform the Idaho Public Utilities Commission ("Commission") of the Company's need for new generation capacity by 2024 based upon the load and resource balance utilized in the 2021 Integrated Resource Plan ("IRP") and subsequently further enhanced as part of the development of the 2023 IRP. I will describe the modifications to the load and resource inputs of the load and resource balance and the resulting identification of Idaho Power's 2024 capacity deficit. Finally, I will provide support for the acquisition of new resources to address identified near-term peak capacity needs in 2024.

I. BACKGROUND

Q. What is the goal of the IRP?

A. The goal of the IRP is to ensure: (1) Idaho Power's system has sufficient resources to reliably serve customer demand and flexible capacity needs over a 20-year planning period, (2) the selected resource portfolio balances cost, risk, and environmental concerns, (3) balanced treatment is given to both supply-side resources and demand-side measures, and (4) the public is involved in the planning process in a meaningful way. For reliability purposes, in the 2021 IRP the Company planned its resource portfolio to have a Loss of Load Expectation ("LOLE") of 0.05 event-days per year or better (i.e. less than one resource adequacy related outage event-day in 20 years).

Q. Please explain the Loss of Load Expectation.

A. The LOLE is a statistical measure of a system's resource adequacy, describing the expected number of days per year that a system would be unable to meet demand. In the 2021 IRP, Idaho Power planned to meet a reliability threshold of 0.05 event-days per year, or better, which represents one resource adequacy related outage event-day, or less, in 20 years. The Company utilizes test years, based on historical data, to calculate the LOLE of any given year. Given Idaho Power's dependence on its hydro system, which fluctuates with annual water

conditions, and the increased frequency of extreme events, in the 2021 IRP the Company aligned its resource adequacy methodology with the Northwest Power and Conservation Council ("NWPCC"). The calculation of a system LOLE is complex, and many forecasting modeling software do not take a LOLE value as a direct input; therefore, the Company developed an internal tool which utilizes the LOLE methodology to produce outputs that can be converted and applied to a tabulated load and resource balance for the purposes of long-term planning.

Q. Please explain the "load and resource balance."

A. The load and resource balance is the Company's tabulated plan that identifies resource deficiencies during the 20-year IRP planning horizon. It helps ensure Idaho Power has sufficient resources to meet projected customer demand including a margin to account for extreme conditions, reserves, and resource outages, and is checked against, and derived to adhere to, the LOLE threshold of 0.05 days per year. It is critical when comparing future resource portfolios that each plan achieves at least a base reliability threshold.

Q. How is the resulting resource sufficiency or deficiency determined through the load and resource balance?

A. At a high level, the load and resource balance incorporates the expected availability of Idaho Power's existing resources, comparing the total output to the Company's forecasted load, and illustrates the resulting capacity length or deficit. This will identify the Company's first resource need date, or the point at which Idaho Power's reliability requirements may not be met.

Q. How is the expected availability of the Company's existing resources determined?

A. The availability of existing resources, including Public Utility Regulatory Policies Act ("PURPA") projects, Power Purchase Agreements ("PPA"), hydro, coal, gas, demand response, and market purchases, is determined using a number of factors such as expected stream flows, plant run times, forced outages, historical performance, and transmission import capability, among other considerations.

Q. How is the load forecast determined?

A. Each year, the Company prepares a forecast of sales and demand of electricity based on a combination of historical system data and trends in electricity usage along with numerous external economic and demographic factors. The anticipated average load and anticipated peak-hour demand forecast represent Idaho Power's most probable outcome for load requirements during the planning

period. The difference between the expected availability of the Company's existing resources and the forecasted load is the resulting capacity length or deficit.

Q. What have previous load and resource balance results indicated with respect to Idaho Power's resource sufficiency?

A. The Company has been generally resource-sufficient since the addition of the Langley Gulch natural-gas fired power plant almost a decade ago until recently. The load and resource balance from the Second Amended 2019 IRP did not show a capacity deficiency occurring until the summer of 2028. However, several converging factors, including limited third-party transmission capacity, load growth, and a decline in the peak serving effectiveness of certain supply-side and demand-side resources have caused Idaho Power to rapidly move to a near-term capacity deficiency starting in 2023. These dynamic circumstances led the Company to immediately file a request for a Certificate of Public Convenience and Necessity ("CPCN") to acquire resources to be online in 2023[1], and Idaho Power expects to acquire additional resources each year thereafter through (at least) 2027, as discussed in the Company's request in this case.

[1] Case No. IPC-E-22-13.

II. 2021 IRP LOAD AND RESOURCE BALANCE

Q. When did Idaho Power identify that there was a resource deficiency starting in 2023?

A. The Company first identified a resource deficiency beginning in 2023 in the spring of 2021 while refreshing the load and resource balance during the development of a Valmy Unit 2 exit analysis, as directed by the Commission in Order No. 34349, Idaho Power's request to update rates to reflect the accelerated depreciation associated with an early exit from coal-fired operations at Valmy, Case No. IPC-E-19-08. Following the filing of the Second Amended 2019 IRP, in the first quarter of 2021, Idaho Power began preparing the required Valmy Unit 2 exit analysis, which included an evaluation of system reliability. This analysis was performed simultaneously with preparation of the 2021 IRP, and the refreshed load and resource balance was further refined through the remainder of the development of the 2021 IRP.

Q. What drove the rapid shift from resource sufficiency to a resource deficiency at this time?

A. Several factors contributed to the change in the load and resource balance at this time, including significant current third-party transmission constraints limiting wholesale market import purchases at peak, the ability of demand response programs to meet load during the

highest peak hours, planning reserve margin determinations and methodology modernization, and load growth exceeding previously forecasted expectations. The net change between the Second Amended 2019 IRP and the updated load and resource balance utilized for the Valmy Unit 2 exit analysis was a reduction in over 500 MW in available capacity each July during the 2022 through 2025 period.

Q. Were similar adjustments made to the load and resource balance used in the 2021 IRP?

A. Yes. The load and resource balance used for the 2021 IRP was updated to include the most up-to-date resource and load inputs, as is standard when developing the load and resource balance as part of the IRP process. On the resource side, the Company applied the adjusted transmission assumptions and made further enhancements to the capacity contribution of variable energy resources utilized to meet reliability requirements, using the LOLE method.

Q. What were the adjusted transmission assumptions used in preparation of the load and resource balance prepared for the 2021 IRP?

A. As I mentioned earlier, the Company identified market purchase assumptions that required changes, primarily as a result of new and evolving market conditions due to a constrained transmission market. The changes

resulted in a net reduction to transmission capacity availability. Because the transmission market continues to be constrained, and is expected to remain constrained, the load and resource balance used in the 2021 IRP included adjusted transmission assumptions to reflect those new market conditions.

Q. You indicated Idaho Power made enhancements to the capacity contribution of variable energy resources utilized to meet reliability requirements as part of the load and resource balance update for the 2021 IRP. What enhancements were made?

A. For reliability purposes, in the 2021 IRP the Company planned its resource portfolio to have a LOLE of 0.05 event-days per year or better (i.e. less than one resource adequacy related outage event-day in 20 years). Aside from taking a more granular hourly approach, the LOLE method can also be used to evaluate the capability of existing resources to meet capacity need through the determination of Effective Load Carrying Capability ("ELCC").

Q. Did the application of ELCC values result in any significant changes to the contributing capacity of Idaho Power's existing resources?

A. Yes. When analyzing Idaho Power's system on a probabilistic hour-by-hour basis, the results indicated

that the capacity contribution of the demand response programs under the changing dynamics of Idaho Power's system was significantly lower than previously assumed. This is primarily the result of increased solar resources on the Company's system pushing net peak load hours outside the longstanding demand response program dispatch window of 1 PM to 9 PM. As a result, Idaho Power filed a request for modifications to its demand response programs that are designed to make the programs more effective at meeting system needs. On March 4, 2022, the Commission issued Order No. 35336, approving Idaho Power's proposed modifications to the demand response programs, effective for the 2022 demand response season.

Q. What resource potential did the Company assume demand response provides as part of the load and resource balance used in the 2021 IRP?

A. With an assumed reduction in participation beginning in 2022 as a result of the demand response program modifications, the 380 MW nameplate capacity was adjusted to 300 MW beginning in 2022 for IRP modeling purposes. The estimated 2021 IRP ELCC of the modified demand response portfolio was 58.5 percent, or approximately 176 MW. For comparison, in Case No. IPC-E-21-32, Idaho Power calculated the increase in capacity contribution from the prior demand response portfolio

parameters to the modified demand response portfolio parameters to be 148 MW.

Q. What was the resulting capacity deficiency identified in the load and resource balance prepared for the 2021 IRP?

A. The resulting capacity deficiency was approximately 101 MW in 2023, 186 MW in 2024, and 311 MW in 2025, which led to Idaho Power's request for a CPCN in Case No. IPC-E-22-13 for the 2023 resource procurement.

III. LOAD AND RESOURCE UPDATE

Q. Since the completion of the 2021 IRP, has the Company continued to monitor other factors that could influence the load and resource balance, and by extension, Idaho Power's resource need?

A. Yes. While the load and resource balance prepared for an IRP is the primary source of information used to inform resource procurement decisions, the Company also recognizes that during the near-term resource decision-making phase, the capacity deficit period can be very fluid. As a result, Idaho Power continually evaluates the load and resource balance to consider near-term known changes, operational enhancements, limitations, or constraints on the existing system, if any, to adequately inform resource needs today. In the face of growing loads, Idaho Power is also keenly focused on current supply chain

challenges, which requires Idaho Power to constantly monitor resource needs and respond with added urgency.

Q. As part of this near-term evaluation, what near-term known changes did the Company identify as having the potential to impact the need for new resources in 2024?

A. First, Idaho Power included the most up-to-date load and resource inputs. The Company's service area continues to experience very high load growth; in response, the load forecast was updated and implemented as soon as it became readily available. In Case No. IPC-E-21-43, Commission Staff requested that Idaho Power change the LOLE threshold to 0.1 event-days per year and increase the load forecast for future analyses; the Company has since utilized a 70th percentile peak load forecast, which for 2024 shows an increase of an expected 33 MW as compared to the 50th percentile peak load forecast utilized in the 2021 IRP. The increase is partially due to recent economic activity.

Q. What modifications were made to the resource inputs included in the revised load and resource balance?

A. Changes to the resource inputs both increased and decreased the resulting capacity deficiency of the revised load and resource balance. There were four resource additions anticipated in 2023 that reduce the previously identified capacity deficit in 2024: (1) the

addition of battery storage resources, (2) new distribution substation battery storage systems, (3) upgrades at the Company's peaking gas plants, and (4) the impact of the demand response program modifications to its effectiveness at meeting the Company's capacity need.

First, the Company added as new resources the Black Mesa project, a 40 MW solar photovoltaic ("PV") PPA in combination with a 40 MW of four-hour duration battery storage, and the Hemingway project, a Company-owned 80 MW four-hour duration battery storage facility, both of which are expected to be in service in 2023. In addition, the Company is installing a total of 11 MW of four-hour duration battery storage beginning in summer 2023 at various distribution substations that will defer transformer upgrades and coincidently effectively reduce system demand during peak hours. Next, an approximate 20 MW of capacity was added to Idaho Power's existing resources to reflect the cost-effective upgrades at two gas plants, which is expected to occur prior to the beginning of the summer of 2023. Finally, utilizing participation data from the 2022 demand response season, Idaho Power increased the nameplate of the demand response portfolio by 20 MW.

Q. What updates to the resource inputs increased the 2024 capacity deficiency?

A. There was one adjustment to the resource inputs that increased the 2024 capacity deficiency: a planned refurbishment of one hydro unit at the American Falls facility will reduce the overall resource availability by approximately 30 MW during the summer of 2024.

Q. Were any adjustments made to the transmission or market purchase assumptions to reflect changes since preparation of the load and resource balance for the 2021 IRP?

A. Yes. First, as explained in Case No. IPC-E-22-13, in late 2021, an opportunity arose for the Company to purchase energy. On December 16, 2021, Idaho Power executed an agreement for the delivery of 76 MW to Idaho Power's border, for the months June through September 2022 through 2024, seven days a week during heavy load hours, reducing the projected capacity deficit identified in the load and resource balance for 2023 and 2024. This short-term purchase only has the effect of deferring, not eliminating, the growing resource need. In addition, the Company reduced the resource availability associated with the capacity benefit margin ("CBM") of 330 MW to 200 MW.

Q. What is CBM?

A. The North American Electric Reliability Corporation ("NERC") defines CBM as:

> "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities ("LSEs"), whose loads are located on that Transmission Service Provider's system, to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements."

Including CBM within the load and resource balance recognizes this held transmission capacity allows Idaho Power to reduce its installed generation capacity to meet reliability requirements under emergency conditions. As an example, if an energy emergency is declared following the loss of multiple Idaho Power network resources, CBM transmission capacity could be utilized to fill the resource capacity need via market purchases. Effectively, Idaho Power considers CBM a reserve resource and applies credit in the load and resource balance.

Q. Why did the Company reduce CBM's capacity availability as part of the load and resource balance computation?

A. There were two primary reasons for the reduction in CBM: (1) the Company is preparing for its future non-binding participation in the Western Resource Adequacy Program ("WRAP") and CBM will not have similar value in that program, and (2) conducted evaluation of the

ability to acquire transmission to the market during emergency conditions.

Q. What is the WRAP?

A. The WRAP will deliver a region-wide approach for assessing and addressing resource adequacy and is an important step forward for reliability in the region. It started at the request of many in the industry who were concerned about the issue of resource adequacy in the west.

Q. How does the WRAP affect the Company's transmission assumption associated with CBM?

A. When evaluating resource adequacy planning requirements under the WRAP, quantification of firm resources will not allow for the inclusion of CBM to demonstrate adequacy. For Idaho Power to meet the WRAP forward showing requirements, have access to the program, and avoid penalties, the Company must acquire firm resources on firm transmission well in advance of each season. CBM, by definition, is only available as firm transmission when the Company is in an energy emergency, and therefore cannot be utilized for WRAP forward showing purposes. However, the Company believes participation in the WRAP will benefit Idaho Power and its customers. With coordination and visibility across participants, the WRAP paints a more accurate, regional picture of resource needs and supply. Participants in the WRAP benefit from

reliability assurance through collaboration, taking advantage of operating efficiencies, diversity, and the sharing of pooled resources.

Q. If CBM cannot be used in the WRAP, why is Idaho Power reducing CBM from 330 MW to 200 MW instead of reducing CBM from 330 MW to 0 MW?

A. The Company is taking an incremental approach to changing assumptions associated with the reliability benefits provided by CBM. As discussed earlier, the WRAP is only one of two major considerations. The WRAP program will not be binding until approximately the summer of 2027, and there remains uncertainty related to the load obligations Idaho Power will be required to meet in the WRAP program, and the credit the Company will receive for its resources in the WRAP program. Idaho Power will continue to consider the transmission assumptions associated with CBM in the load and resource balance as the WRAP program matures.

The second major consideration to CBM is whether it enhances the Company's ability to recover from a major unplanned disturbance. Following such a disturbance, the Company can utilize its CBM capacity to bring in reserves for one hour, and in that hour, Idaho Power must acquire capacity from the market, and the transmission between the capacity resource or market hub and the Company's transmission system, to continue to utilize CBM.

Q. What are the results of Idaho Power's evaluation of transmission acquisition under emergency conditions?

A. The Company believes that acquiring 330 MW in an emergency situation may not be possible with current transmission constraints, especially during regional extreme weather events. As evidenced during recent energy emergency events resulting from extreme weather in the region, increased demand that cannot be met with local generation results in strain on the interconnected transmission system. Understanding the importance of transmission availability during times of high electricity demand, entities have reserved transmission capacity across the west, including just outside the Company's border, significantly limiting Idaho Power's access to market hubs.

The Company's own transmission service queue was flooded with multi-year requests with third-party marketing firms looking to move energy from Mid-C across Idaho Power's transmission system to the south. These transmission service requests at the Company's borders have added to an already constrained transmission market limiting the Company's access to Mid-C. Last minute transmission acquisition under emergency conditions between the market and Idaho Power's border have not been

consistently available providing further support that an adjustment to CBM is appropriate.

Put another way, in the event of an energy emergency, the Company will be able to utilize available transmission within its borders; however, there may not be available transmission between Idaho Power's border and the Mid-C market given the new transmission constraints. The transmission constraint issue may be short term. Because the Boardman to Hemingway project will create incremental transmission capacity between Idaho Power and the Mid-C market, Idaho Power will continue to evaluate CBM benefits as part of resource planning in the future.

Given Idaho Power's movement towards WRAP, the certainty that the WRAP program will assign no resource adequacy value to CBM, and the uncertainty of being able to access emergency capacity resources when the Company is in an energy emergency (the purpose of CBM), Idaho Power has decided to reduce its reliance on CBM from 330 MW to 200 MW for resource adequacy planning purposes. The Company will continue to evaluate CBM's reliability benefits and effectiveness in future IRPs.

Q. Were there any additional updates made to the load and resource inputs?

A. No. However, additional enhancements were made to the Company's reliability evaluation in preparation for

the 2023 IRP, currently under development. First, Idaho Power adjusted the Company's resource capacities to account for Equivalent Forced Outage Rates during Demand ("EFORd") using a 5-year rolling average from the NERC Generation Availability Data System ("GADS"). The updated 5-year rolling average EFORd values will better reflect industry average generation resource performance data and resulting outage rates. Second, the Company adjusted the LOLE threshold from the 2021 IRP's 0.05 event-days per year to 0.1 event-days per year, following Commission Staff's recommendation in their comments filed in Case No. IPC-E-21-43, which recommended a change in both the LOLE threshold and load forecast percentile. These enhancements are being made as part of the load and resource balance being developed for the 2023 IRP.

Q. Based on your evaluation of the near-term factors having the potential to impact the load and resource balance for 2024, what is your estimate of the resulting capacity length or deficit?

A. While procurement of 120 MW of dispatchable energy storage addressed the 2023 capacity deficits, and reduced the 2024 deficit, a 2024 capacity deficit still exists. Following updates to the load and resource inputs, including the new 2023 resources, and enhancements to the calculation of reliability thresholds since completion of

the load and resource balance used for the 2021 IRP, the 2024 capacity deficiency has decreased from 186 MW to approximately 103 MW.

IV. MEETING THE CAPACITY DEFICIENCY

Q. Has Idaho Power taken any actions to acquire resources to meet the 2024 capacity deficit?

A. Yes. Under Idaho law, Idaho Power has an obligation to provide adequate, efficient, just, and reasonable service on a nondiscriminatory basis to all those that request it within its certificated service area.[2] In order to meet its obligations to reliably serve customer load, and given the extremely short turn-around to construct a resource to meet the first deficit in the summer of 2023, particularly in the midst of supply chain disruption, ongoing COVID-19 impacts, and constraints in the industry and in ancillary industries, on June 30, 2021 the Company conducted a competitive solicitation through a Request for Proposals ("RFP") seeking to acquire up to 80 MW of peak capacity resources to meet the 2023 capacity deficit - seeking projects to be online by June of 2023 ("2021 RFP"). As presented in Case No. IPC-E-22-13 for which the Commission granted a CPCN with Order No. 35643, the RFP process resulted in the procurement of 120 MW of dispatchable four-hour duration energy storage as well as

[2] Idaho Code §§ 61-302, 61-315, 61-507.

execution of a 20-year PPA for 40 MW of solar, all of which were necessary to adequately address 2023 capacity deficits. However, the acquisition will not completely satisfy the previously identified capacity deficiencies in 2024.

Q. What actions did Idaho Power take to satisfy the 2024 capacity deficiency?

A. As indicated by in Order No. 35643, Idaho Power is responsible for planning and managing its load and resource portfolio and the Commission expects "the Company to closely monitor its projected capacity needs going forward and to act proactively to ensure a robust RFP process can be completed."[3] Therefore, similar to the RFP issued to address the 2023 deficiency, given the short turn-around to construct a resource to meet the deficit in the summer of 2024, on December 30, 2021, the Company conducted a competitive solicitation through an RFP seeking to acquire energy and capacity to help meet Idaho Power's previously identified capacity needs of 85 MW in 2024 and an incremental 115 MW in 2025 ("2022 RFP"). As detailed in Company witness Mr. Hackett's testimony, the RFP process resulted in the selection of a 100 MW solar PV plus 60 MW four-hour duration energy storage project, consisting of a 25-year PPA associated with a 100 MW solar PV facility that

[3] Case No. IPC-E-22-13, Order No. 35643, p. 13.

supplies energy to the Company's system combined with an Idaho Power-owned 60 MW four-hour duration battery storage facility.

Q. Will the combined 100 MW solar PV plus 60 MW four-hour duration energy storage project address the near-term capacity deficit in 2024?

A. No. Evaluation of the reliability given 2024 forecasted load and generation, including the 100 MW solar PV plus 60 MW four-hour duration energy storage project, results in a remaining capacity deficit of 7 MW. To ensure the Company is able to continue to provide safe, reliable service to its customers in 2024, and as evidenced by the fluidity of the load and resource balance recently, an additional Idaho Power-owned 12 MW four-hour duration energy storage project was least-cost/least-risk and selected as part of the RFP process.

Q. Do you believe there is sufficient support for the procurement of the PPA and the 72 MW of four-hour duration battery storage resources to be online in 2024?

A. Yes, I do. The two acquisitions were pursued and procured as a least cost/least risk method of meeting the 2024 capacity deficits identified in the Company's 2021 IRP and subsequently with the results of the revised load and resource balance. The fluidity of the load and resource

balance and continued high load growth further supports this resource procurement.

V. CONCLUSION

Q. Please summarize your testimony.

A. Idaho Power's most recently updated load and resource balance has identified a 2024 capacity need of 103 MW. In response to this resource need, the Company has executed a 100 MW solar PV PPA and agreements to procure 72 MW of four-hour duration battery storage resources to satisfy the identified capacity need in 2024.

Q. Does this complete your testimony?

A. Yes, it does.

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DECLARATION OF JARED L. ELLSWORTH

I, Jared L. Ellsworth, declare under penalty of perjury under the laws of the state of Idaho:

1. My name is Jared L. Ellsworth. I am employed by Idaho Power Company as the Transmission, Distribution & Resource Planning Director for the Planning, Engineering & Construction Department.

2. On behalf of Idaho Power, I present this pre-filed direct testimony in this matter.

3. To the best of my knowledge, my pre-filed direct testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence before the Idaho Public Utilities Commission and is subject to penalty for perjury.

SIGNED this 17th day of February 2023, at Boise, Idaho.

Signed: