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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF IDAHO POWER COMPANY FOR)	CASE NO. IPC-E-23-11
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC)	
SERVICE IN THE STATE OF IDAHO AND)	
FOR ASSOCIATED REGULATORY)	
TREATMENT)	

TESTIMONY IN SUPPORT OF SETTLEMENT STIPULATION

OF BRADLEY J. HEUSINKVELD
FOR THE IDAHO CONSERVATION LEAGUE

November 15, 2023

1 **I. INTRODUCTION AND TESTIMONY**

2 **Q. Please state your name.**

3 A. My name is Bradley J. Heusinkveld.

4 **Q. Please state your employer, business address, and position.**

5 A. I am the Energy Policy Associate for the Idaho Conservation League. My business
6 address is 710 N. 6th Street, Boise, Idaho.

7 **Q. Please describe your educational and professional background.**

8 A. I hold a Bachelor of Science Degree in Chemistry from the University of Puget
9 Sound and Juris Doctorate from Lewis & Clark Law School. Prior to pursuing a law degree,
10 I worked as an analytic chemist, first under contract for the Environmental Protection
11 Agency's Region 10 CERCLA Emergency Response program in Seattle, Washington, and
12 then for Glorietta Geoscience, Inc., a hydrogeology consulting firm in Santa Fe, New
13 Mexico.

14 I joined the Idaho Conservation League ("ICL") as its Energy Policy Associate in
15 August 2022. My responsibilities include engaging with Idaho's regulated utilities in
16 Integrated Resource Planning, efficiency program development, and other avenues for
17 energy and decarbonization advocacy. I frequently engage in utility dockets at the Idaho
18 Public Utilities Commission ("PUC" or "Commission"), including general rate cases
19 brought by Intermountain Gas Company and Avista Corporation in the past calendar year. I
20 advise my colleagues at ICL on energy and regulatory matters as they intersect with other
21 organizational campaigns and Idaho's natural values. As part of my portfolio, I coordinate
22 with colleagues across the Pacific and Intermountain West on regional energy advocacy.

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1 My organizational goal is to promote access to affordable and reliable energy that
2 ensures the quality of life of Idahoans by protecting clean air, clean water, resilient
3 landscapes and critical to all, a stable climate system.

4 **Q. Have you previously testified before the Commission?**

5 **A.** Yes. I sponsored the direct testimony of Lauren McCloy in Avista Corporation’s
6 General Rate Case, AVU-E-23-01, at technical hearings before the Commission on August
7 2, 2023. My testimony was limited in scope to the written responses of Lauren McCloy, a
8 colleague employed by the Northwest Energy Coalition.

9 **Q. What is the purpose of your testimony in this proceeding?**

10 **A.** The purpose of my testimony is to support the settlement stipulations agreed to by
11 Idaho Power (“Company”), the Commission Staff (“Staff”), and all intervenor parties
12 regarding the Company’s general rate case, IPC-E-23-11. Intervenor parties (collectively,
13 “Parties”) are: Clean Energy Opportunities for Idaho (“CEO”), Industrial Customers of
14 Idaho Power (“ICIP”), City of Boise, Idaho Irrigation Pumpers Association, (“IIPA”),
15 Micron Technology Inc. (“Micron”), the Federal Executive Agencies (“FEA”), NW Energy
16 Coalition (“NWEC”), IdaHydro, Walmart, Inc., and ICL. The Company filed a proposed
17 settlement agreement and an accompanying motion with the Commission on October 27,
18 2023. My testimony expresses the Idaho Conservation League’s support of the proposed
19 settlement and recommends the Commission adopt it without material alteration or
20 conditions.

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1 **Q. Do you believe the settlement is in the public interest and meets fair, just, and**
2 **reasonable standards.**

3 **A.** Yes. Parties agreed to the proposed settlement following extensive negotiations and
4 review of the Company’s applications, work papers, discovery, and data requests.
5 Importantly, all Parties agreed to the settlement in its totality. Staff and intervenors
6 collectively represent a diverse set of customer groups and interests. Reaching an agreeable
7 compromise between all twelve Parties necessitated balancing these interests, while
8 accommodating the Company’s need for cost recovery and financial stability. For its part,
9 ICL believes the settlement is a fair compromise and in the public interest. Parties arrived at
10 moderate reductions in revenue requirement, rate of return, revenue adjustments, and
11 reasonable alterations to rate design elements. Broadly, these adjustments would reduce bill
12 impacts to customers, more equitably spread revenue burdens between customer classes,
13 gradually change rate design elements, and better align cost allocation to system costs. We
14 believe the proposed settlement better aligns with the public interest than the Company’s
15 application.

16 **Q. How did the Parties arrive at settlement?**

17 **A.** Settlement meetings with the Company began on September 18, 2023 followed by a
18 series meetings between Staff and intervenors. All parties attended, in person or remotely.
19 While the contents of the negotiations remain confidential under Commission Rule 272, the
20 parties extensively negotiated the multitude of issues presented by the Company’s
21 application, resulting in several iterative settlement proposals. Individual parties supported
22 positions with various analyses and sample work papers, some of which are incorporated
23 into the proposed settlement before the Commission. Over three weeks of meetings

1 concluding on October 5, 2023, Parties and the Company gradually moved towards the
2 broad contours of a prospective agreement while addressing individual issues and
3 navigating inherent tensions and trade-offs between party positions. Staff and all the
4 intervenor parties aligned around a wholistic offer, which the Company accepted before
5 drafting and revising the proposed settlement and motion delivered to the Commission on
6 October 27, 2023.

7 **Q. Did ICL advocate for any settlement provisions?**

8 **A.** Yes. During negotiations ICL advocated for several positions and, at times,
9 supported the requests of other parties. In other instances, we withheld commentary or
10 deferred to the positions and analysis of others. To reach agreement, we moderated our
11 positions to accommodate other parties and the Company.

12 **Q. How does the Settlement Address the Idaho Conservation Leagues interests?**

13 **A.** ICL's energy program aims to promote energy efficiency and renewable integration
14 as steps toward decarbonization. We believe the proposed settlement offers a marked
15 improvement in these matters over the Company's application. If adopted by the
16 Commission, the settlement would more gradually increase monthly customer charges, an
17 issue we focused on in previous dockets before the Commission, as it impacts rate payer
18 interests in efficiency, intraclass equity, and its relation to long term resource planning and
19 utility investment. We also welcome progress on the Company's time of use schedules,
20 commitment to develop a revenue neutral bill protection program, and engagement with
21 parties on examining cost of service methodologies. Additionally, the settlement allows the
22 Company to better utilize investment tax credits, support demand side management
23 programs, and manage its efficiency programs.

1 **Q. How did ICL evaluate the settlement stipulations?**

2 A. ICL assessed the settlement stipulations in their totality. While we advocated for a
3 number of provisions, we ultimately agreed to the proposal as a whole, based on its fairness
4 and compatibility with the public interest. Many issues presented in the Company's
5 application and the stipulations are interrelated, and fairness requires delicate balancing and
6 co-consideration. We believe the negotiations and proposed settlement before the
7 Commission accommodate this balance, and so offer our support. We would have been
8 unlikely to accept a bifurcated settlement with some parties agreeing on individual issues
9 and disagreeing on others. In this instance, an all-parties, all-issues settlement was key to
10 our evaluation of a fair and just offer.

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12 **II. CONCLUSION**

13 **Q. What are your recommendations regarding the proposed settlement?**

14 A. I recommend the Commission accept the proposed settlement in whole without
15 material alteration or condition. It represents a fair compromise between the Company and
16 Parties, addresses ICL's concerns, and accommodates the public interest.

17 **Q. Do you offer other concluding remarks?**

18 A. Yes. I appreciate the efforts of the Staff, Company, and Parties in this matter. In my
19 opinion, the breadth and complexity of matters in this rate case is impressive and was well
20 handled. Reaching settlement required respect, tact, and flexibility from all, and it is good to
21 see commonality emerge from our various posts and perspectives.

22 **Q. Does this conclude your testimony?**

23 A. Yes, it does.

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DECLARATION OF BRADLEY J. HEUSINKVELD

I, Bradley J. Heusinkveld, declare under penalty of perjury under the laws of the state of Idaho:

- 1. My name is Bradley J. Heusinkveld. I am employed by the Idaho Conservation League as Energy Policy Associate.
- 2. On behalf of the Idaho Conservation League, I present this pre-filed direct testimony.
- 3. To the best of my knowledge, my testimony is true and accurate.

I 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 of perjury.

SIGNED this 15th Day of November 2023 in Boise, Idaho.

Signed : 
Bradley J. Heusinkveld

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of November, 2023, I delivered true and correct copies of the foregoing TESTIMONY to the following persons via the method of service noted:

/s/ Matthew A. Nykiel

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