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IDAHO PUBLIC UTILITIES COMMISSION PUBLIC

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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 DONN ENGLISH IN SUPPORT OF THE STIPULATION AND SETTLEMENT

IDAHO PUBLIC UTILITIES COMMISSION

NOVEMBER 15, 2023

1 Q. Please state your name and business address. 2 My name is Donn English. My business address is 3 Α. 11331 W. Chinden Blvd., BLDG 8, STE 201-A, Boise, Idaho 4 83714. 5 By whom are you employed and in what capacity? 6 0. Α. I am employed by the Idaho Public Utilities 7 Commission ("Commission") as a Program Manager overseeing 8 the Accounting and Finance Department in the Utilities 9 Division. 10 11 Ο. Please describe your educational background and professional experience. 12 I was hired by the Commission in 2003 and I have 13 Α. provided testimony in numerous proceedings. My educational 14 15 background and professional experience are provided in more detail in Exhibit No. 101. 16 What is the purpose of your testimony in this Ο. 17 proceeding? 18 19 Α. The purpose of my testimony is to describe the Application of Idaho Power Company ("Idaho Power" or 20 "Company") for authority to increase its rates and charges 21 for electric service in Idaho, explain Staff's 22 investigation and evaluation of the Application, 23 and provide an overview of the stipulated revenue requirement. 24 Staff Witness Taylor Thomas will testify to the Cost of 25

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Service, Rate Spread and Rate Design issues, and other 1 agreements discussed in the Settlement. 2 How is your testimony organized? 3 Ο. My testimony is subdivided under the following Α. 4 headings: 5 Page 2 Background 6 7 Staff Investigation Page 4 Settlement Evaluation Page 6 8 Settlement Overview Page 7 9 Revenue/Expense Adjustments Page 7 10 Deferrals/Mechanism-Related Adj. Page 11 11 12 Revenue Sharing Mechanism Page 15 Background 13 Please describe Idaho Power's original filing. Ο. 14 15 Idaho Power made its original filing with the Α. 16 2023, requesting authority to Commission on June 1, 17 increase its revenue in Idaho by approximately \$111.3 18 million, or 8.61%, which included a corresponding decrease 19 in the Power Cost Adjustment ("PCA") of \$173.4 million and 20 reduction to the annual Energy Efficiency Rider 21 а collection of \$3.5 million. The Company requested the 22 increase to be effective July 1, 2023, recognizing that 23 the effective date would be suspended to January 1, 2024. 24 The Company proposed a 10.4% Return on Equity ("ROE") 25

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and a 4.895% cost of debt, for an overall return of 7.702% and a capital structure of 51% equity and 49% debt.

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Additionally, the Company proposed several changes to the rate design intended to recover costs. Most notably, the Company proposed increasing the residential monthly Service Charge from \$5.00 to \$15.00 and increasing by \$10.00 each year until it reaches \$35.00 after three years.

Q. How was this case processed after the Company's filing was received?

The Commission issued a combined Notice of 10 Α. 11 Application, Notice of Suspension of Proposed Effective 12 Date, and Notice of Intervention Deadline ("Notice") on The Notice established an Intervention 13 June 23, 2023. 14 Deadline of July 14, 2023. Intervenor status was 15 subsequently granted to Clean Energy Opportunities for 16 Idaho ("CEO"), City of Boise, the Federal Executive 17 Agencies ("FEA"), the Industrial Customers of Idaho Power 18 ("ICIP"), Idaho Conservation League ("ICL"), IdaHydro, 19 Idaho Irrigation Pumpers Association, Inc. ("IIPA"), 20 Micron Technology, Inc. ("Micron"), NW Energy Coalition 21 ("NWEC"), and Walmart, Inc. ("Walmart"). These entities are collectively referred to as the "Parties" along with 22 23 Staff and the Company.

The Parties participated in settlement conferences on September 18, 2023, and October 4-5, 2023. Following the

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Staff Investigation

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Q. What type of investigation did Staff conduct to evaluate the Company's rate increase request?

Staff's approach in any general rate case is to Α. 8 Company's Application 9 extensivelv review the and associated testimony and workpapers, identify adjustments 10 to the proposed revenue requirement, and prepare to file 11 12 testimony for a fully litigated proceeding. There were 15 Staff members analyzing this case consisting of auditors, 13 engineers, utility analysts, and compliance investigators. 14 Additionally, five supervisors reviewed the results of all 15 analysis. 16

Staff auditors reviewed the Company's test year 17 results of operations, capital budgets, capital spending 18 trends, operations and maintenance ("O&M") expenses and 19 trends. Additionally, Staff verified all of the Company's 20 calculations and assumptions with regard to the overall 21 The auditors reviewed thousands of revenue requirement. 22 transactions, selected samples, and performed transaction 23 testing in accordance with standard audit procedures. 24 Staff reviewed the Company's labor expenses, incentive 25

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plans, and employee benefits to ensure the appropriate
 level of expenditures are included in rates.

Staff 3 reviewed both completed and proposed Company investments to determine the prudency of capital 4 Expenditures including insurance expense, additions. 5 salaries, and M&O expenses also examined. 6 were Additionally, Staff investigated the Company's cost of 7 capital, capital structure, cost of service, 8 revenue 9 normalization, and proposed rate design. In total, Staff submitted over 300 production requests, performed an onsite 10 11 audit of the Company's books, and held several meetings with Company personnel as a part of its comprehensive 12 investigation. 13

Following its investigation, Staff proposed over 40 separate revenue requirement adjustments during settlement discussions. Many of which were either completely or partially accepted by the Company.

18 Settlement Evaluation

Q. How did Staff determine that the overall ProposedSettlement was reasonable?

A. In every settlement evaluation, Staff and other parties must examine the risks of losing positions at hearing and determine if the settlement is a better overall outcome. Staff must evaluate each individual adjustment and determine the likelihood of the Commission accepting

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or rejecting Staff's rationale for the adjustment. Ultimately, Staff's intent in every settlement conference is to negotiate the best possible outcome for customers.

Q. Does Staff support the Proposed Settlement as reasonable?

comprehensive review of the after Α. Yes, a 6 Company's Application, a thorough audit of the Company's 7 books and records, an analysis of the Company's class cost 8 of service study, and extensive negotiations with the 9 supports the Proposed Parties to the case, Staff 10 The Proposed Settlement offers a reasonable Settlement. 11 balance between the Company's opportunity to earn a 12 reasonable return on its investment and affordable rates 13 for customers. Staff believes the Proposed Settlement is 14 in the public interest; is fair, just, and reasonable; and 15 should be approved by the Commission. 16

17 Settlement Overview

Q. Would you please briefly describe the terms ofthe Proposed Settlement?

A. The Proposed Settlement provides for a reduction in the Company's requested revenue requirement. Instead of the Company's proposed increase of \$111.3 million (8.61%), under the Proposed Settlement, retail revenues for Idaho customers will increase by \$54.7 million (4.25%) effective January 1, 2024. For residential customers, the

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1 monthly Service Charge will increase from \$5.00 to \$10.00 on January 1, 2024. On January 1, 2025, the monthly Service 2 Charge will increase to \$15.00. For Small General Service 3 4 customers, the Service Charge will increase from \$5.00 per 5 month to \$25.00 per month. Other specific rate design issues in the Proposed Settlement are discussed in greater 6 7 detail in Staff Witness Thomas' testimony.

Revenue/Expense Adjustments

9 0. Please explain how the Proposed Settlement addresses the Company's cost of capital. 10

Α. The Parties agree to a 9.6% ROE and a 7.247% 11 overall rate of return applied to an Idaho jurisdictional 12 rate base of \$3,816,351,478. The Company's cost of debt 13 14 and capital structure were not specified in the Proposed 15 Settlement. The impact of this cost of capital adjustment 16 is a reduction of \$23,461,105 to the Company's requested 17 increase. Staff believes the overall cost of capital adjustment is reasonable. However, Staff's review included 18 19 a different capital structure and 9.5% ROE when justifying 20 the agreed terms in this area.

Will you please explain rate base adjustments 21 Q. identified in the Proposed Settlement? 22

23 In its Application, the Company annualized large Α. 24 capital projects that were placed in service during 2023 to include in its proposed rate base at End of Period 25

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("EOP") values. The Proposed Settlement removes the 1 Company's annualization adjustments, effectively including 2 those capital projects in rate base at an Average of 3 instead of EOP. Monthly Averages ("AMA") value 4 Additionally, Plant Held for Future Use ("PHFU") was also 5 removed from the Company's proposed rate base. The test 6 year methodology adjustment and the PHFU adjustment 7 decrease the Company's proposed revenue requirement by 8 approximately \$8.3 million. describe Ο. Please the 9 Battery Augmentation adjustment. 10

The final rate base adjustment removes the Α. 11 Battery Augmentation projects for the Black Mesa and 12 Hemingway Battery Energy Storage Systems ("BESS") from the 13 Company's proposed rate base. This adjustment removes 14 approximately \$2.3 million from the revenue requirement. 15 To offset the revenue impact of this adjustment, the 16 Company will be provided the opportunity to accelerate the 17 amortization of additional Accumulated Deferred Investment 18 Tax Credits ("ADITC"). 19

20 Q. Please explain the expense adjustments outlined 21 in the Proposed Settlement.

A. The first expense adjustment relates to Companyowned employee housing. Idaho Power provides housing for employees in remote areas where it can be difficult to attract qualified employees. To entice potential employees

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to work in those remote areas, the Company offers one year of free rent in a Company-owned residence. This adjustment imputes the revenue that could have been received if Idaho Power charged the market rate for rent on these properties. The impact of this adjustment is a \$136,485 reduction to the revenue requirement.

Q. Please explain the adjustments for employee-related expenses.

Α. The Parties agreed to two separate adjustments 9 regarding employee labor costs. The first adjustment 10 removes the long-term "Pay at Risk" payments tied to the 11 financial performance of the Company for officers and 12 Because the metrics to determine the 13 senior managers. award and calculation of these incentive payments were 14 based on financial criteria that benefit shareholders, it 15 is appropriate to remove this amount from customers' rates. 16 17 The second employee labor adjustment removes a portion of the Company's 2022 General Wage Adjustment ("GWA") and the 18 entirety of the 2024 GWA. The two adjustments reduced the 19 20 Company's rate request by approximately \$14.4 million.

Q. Will you please discuss the remaining expense adjustments?

A. The remaining expense adjustments are comprised of an adjustment to the Company's proposed uncollectible expense, miscellaneous adjustments, and a non-specific

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rate reduction adjustment. The Company proposed an 1 Uncollectible Expense adjustment that used a 10-year The Parties agreed average of actual bad debt expenses. 3 to reduce the Company's 10-year average to an amount that consistent with the Company's recent bad debt is experience. 6

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The Miscellaneous Expense adjustments remove expenses 7 associated with 1) a portion of the Company's billing 8 provide specific benefits to inserts that did not 9 injuries and damages caused by employee customers, 2) 10 actions, 3) Company airplane flights not associated with 11 to customers and the associated 12 providing service maintenance, 4) advertising to enhance the Company's image, 13 5) certain credit card expenses lacking documentation 14 15 and/or for purchases that did not provide service to customers, 6) unrealized benefits of the Company's mobile 16 application, and 7) board of directors' compensation and 17 expenses. 18

The Proposed Settlement also includes a Non-Specific 19 adjustment of approximately \$4.2 million. This adjustment 20 accounts for a portion of the value of other adjustments 21 proposed by Staff and intervenors not specifically accepted 22 by the Company and is used to arrive at the stipulated 23 revenue increase of 4.25%. 24

Deferrals/Mechanism-Related Adjustments 25

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1 Q. Will you please explain the Deferrals and other Mechanism-Related Adjustments? 2

Yes, the final set of adjustments are made to Α. 3 the Company's proposed revenue requirement to adjust for 4 either the timing of recovery for the Company or amounts 5 moved to other mechanisms for recovery. The first of these 6 adjustments relates to the Company's Energy Efficiency 7 Rider ("Rider") funded activities. In Order No. 33908, 8 9 the Commission established a 2% cap on wage increases funded through the Rider to address Staff's concerns that 10 11 Rider-funded labor expenses increase annually without the scrutiny labor expenses receive during a general rate case. 12 Rather than continue with capping the annual wage increases 13 in the Rider, the Company proposed to move all Rider-funded 14 15 labor expenses (approximately \$3.5 million) to base rates. The Company also proposed a corresponding decrease in the 16 Schedule 91, Energy Efficiency Rider, from the current 3.1% 17 to 2.25%. 18

The Parties agree that the Energy Efficiency Rider-19 funded labor should be funded through base 20 rates. Additionally, the Parties agree that existing obligations 21 for the Low-Income Weatherization Assistance Program (\$1.2 22 million) and low-income education (\$125,000) 23 should be moved from base rates to the Rider. 24 By funding these income-qualified programs through the Rider, interested 25

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parties can request changes to the Commission Ordered 1 funding levels without having to wait until the Company To account for approximately files a general rate case. 3 \$1.3 million in low-income program funding shifted from 4 base rates to the Rider, the Parties agree to increase the 5 Company's proposed Rider collection rate from 2.25% to 6 2.35%. 7

What are the terms of the Proposed Settlement Ο. 8 regarding the Company's participation in the Western 9 Resource Adequacy Program ("WRAP")? 10

Consistent with Order No. 35920 in Case No. IPC-Α. 11 E-23-08, the Parties agree that the Company will defer its 12 test year WRAP expenses in a regulatory asset account for 13 future recovery when the Company can show realized 14 15 benefits. This reduced the Company's revenue requirement by \$585,182. 16

describe Funding Please the Intervenor 17 Ο. Amortization? 18

The Company deferred all intervenor funding Α. 19 ordered since its 2011 general rate case and proposed to 20 recover the balance in this case. The Parties agree to 21 amortize the deferral balance over seven years, which 22 reduces the Company's revenue requirement by \$235,319. 23

Ο. Please describe how the Proposed Settlement 24 Company's Wildfire Expenses accounts for the and 25

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1 Amortization?

2	A. The Parties agree to remove various one-time
3	wildfire-related costs that will not continue in the
4	future, reducing the revenue requirement by \$328,055. The
5	Parties also agree to allow Idaho Power to continue to
6	defer incremental vegetation management expenses and
7	incremental insurance expenses above the 2022 actuals
8	amount until the earlier of the Company's next general rate
9	case or 2025. Additionally, expenses related to the
10	Covered Wire Evaluation pilot and the Vegetation Management
11	Satellite and Aerial Patrols pilot will continue to be
12	deferred through 2025.

13 The Company proposed to begin amortizing a portion of the wildfire deferral in this case. The Parties agree to 14 begin amortizing the total balance of the wildfire deferral 15 over seven years, which will increase the Company's revenue 16 requirement. Staff was concerned about a pancaking effect 17 in future rate cases and believes that amortization of the 18 full balance is reasonable. The balance will be offset by 19 20 \$400,000 of grants received for the Fire Mesh and Vegetation Management Satellite projects. The net effect 21 of all wildfire expense and amortization adjustments is an 22 increase of approximately \$1.6 million to the Company's 23 revenue requirement. 24

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Q. Please describe the Net Power Supply Expense

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A. This adjustment was made to update the modelling assumptions related to wheeling that reduces the Company's filed NPSE by \$5,651,170. Net of the PCA Transfer Adjustment proposed by the Company in its Application, this adjustment results in a net reduction to the Company's revenue requirement of \$291,972.

Revenue Sharing Mechanism

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9 Q. Please describe the Company's revenue sharing
10 mechanism and the terms in the Proposed Settlement
11 regarding the mechanism and ADITC?

In Order No. 30978, the Commission approved a 12 Α. stipulation that created a revenue sharing mechanism based 13 on the Company's actual earned ROE each year. This 14 mechanism has been modified and extended through several 15 orders since inception. The mechanism provides benefits 16 to customers if the Company's actual earned ROE for any 17 given year is greater than a predetermined ROE. 18 When the actual earned ROE exceeds the allowed ROE, the Company 19 returns a portion of the excess earnings to customers, 20 21 either through a rate reduction in the Company's PCA or an offset to the Company's pension deferral. If the Company's 22 actual earned ROE is below a certain threshold, the Company 23 is authorized to accelerate the amortization of ADITC, up 24 to \$25 million annually, to improve its actual ROE. 25

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1 Under the terms of the Proposed Settlement, the 2 Parties agreed to continue the mechanism, modified to include an additional amount of Investment Tax Credits 3 ("ITC") equal to the incremental ITC generated from the 4 5 Company's investment in the Black Mesa and Hemingway BESS projects. The Parties also agree to remove the \$25 million 6 7 cap on the annual accelerated amortization of ITC. The Proposed Settlement establishes a threshold of 9.12% that 8 the Company's ROE must be below for it to accelerate the 9 10 amortization of ITCs. If the Company's ROE is above 9.6%, revenue sharing will be provided as a benefit in the PCA. 11 12 The Company will no longer be required to use a portion of the excess earnings to offset its customer-funded pension 13 obligations. 14

15 Q. Do you have any other comments on the Proposed 16 Settlement?

17 Α. Yes. The Proposed Settlement is a result of detailed 18 analysis and thoughtful negotiations by all 19 Parties. The Proposed Settlement results in a mitigated 20 rate increase for customers, a reasonable resolution on several contested issues while identifying areas requiring 21 22 additional discourse to resolve. The Proposed Settlement 23 represents a compromise between the Parties to establish just, fair, and reasonable rates while providing the 24 25 Company with additional cash flows necessary to finance

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1	its	electric utility operations. Staff recommends that
2	the	Commission approve the Proposed Settlement, signed by
3	all	Parties, as filed.
4		Q. Does this conclude your testimony in this
5	prod	ceeding?
6		A. Yes, it does.
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Professional Qualifications

of

Donn English

Program Manager - Accounting and Finance Idaho Public Utilities Commission

EDUCATION

Mr. English graduated from Boise State University in 1998 with a Bachelor of Business Administration degree in Accounting. His studies concentrated on corporate finance and taxation. He was a member of the Alpha Beta Psi honor society for Accounting students. He completed the Annual Regulatory Studies Program, the Advanced Regulatory Studies Program, and the Accounting and Ratemaking Course offered through the Institute of Public Utilities at Michigan State University. Additionally, he regularly attends meeting and conferences sponsored by the National Association of Regulatory Financial Analysts.

In 2001, Mr. English became a designated member of the American Society of Pension Professionals and Actuaries (ASPPA) and was awarded the professional designation of Qualified Pension Administrator (QPA) and Qualified 401(k) Administrator (QKA). Mr. English was also a member of the Association of Certified Fraud Examinators.

BUSINESS EXPERIENCE

Prior to joining the Idaho Public Utilities Commission (IPUC), Mr. English was a Trust Accountant with a pension administration, actuarial, and consulting firm in Boise, Idaho. In 1999, he was promoted to Pension Administrator, and in 2001 he was promoted to Pension Consultant. In that capacity, Mr. English performed actuarial calculations and the required nondiscrimination calculations for hundreds of qualified retirement plans. He completed and filed Form 5500s and represented clients during audits by the Department of Labor and the Internal Revenue Service. He also participated on the task force that wrote questions for the ASPPA administrator and actuarial exams.

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Mr. English joined the IPUC in 2003 as a Staff Auditor. In 2016, he was promoted to Audit Team Lead, and in 2018 he became the Program Manager for the Accounting and Finance Department within the Utilities Division. In 2020, Mr. English accepted the responsibility of supervising the Technical Analysis and Energy Efficiency team and was the Program Manager for that team until 2022. At the Commission, Mr. English has audited a number of utilities including electric, water, and natural gas companies, and provided comments and testimony in numerous cases dealing with general rates, tax issues, pension issues, depreciation and other accounting issues, and other regulatory policy decisions. Mr. English participates in the Energy Efficiency Advisory Groups and External Stakeholder Advisory Committees for Idaho Power, Avista Utilities, Rocky Mountain Power, and Intermountain Gas Company. He is a member of several of the National Association of Regulatory Utility Commissioners (NARUC) working groups including the NARUC State Working Group on Performance-Based Regulation, the NARUC State Working Group on Electric Vehicles, and the NARUC State Working Group on Grid-Interactive Efficient Buildings in collaboration with the National Association of State Energy Officials (NASEO). Mr. English is the Chair of the NARUC Staff Subcommittee on Education and Research and the Vice Chair of the NARUC Staff Subcommittee of Accounting and Finance. Mr. English is also a faculty member of NARUC Rate School.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15th DAY OF NOVEMBER 2023, SERVED THE FOREGOING **DIRECT TESTIMONY OF DONN ENGLISH IN SUPPORT OF THE STIPULATION AND SETTLEMENT,** IN CASE NO. IPC-E-23-11, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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