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IDAHO PUBLIC
UTILITIES COMMISSION

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August 15, 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-23-14
Application for Authority to Implement Changes to the Compensation
Structure Applicable to Customer On-Site Generation Under Schedules 6, 8,
and 84 and to Establish an Export Credit Rate Methodology

Dear Ms. Noriyuki:

Attached for electronic filing is the Errata to the Direct Testimony of Jared L. Ellsworth 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:cd
Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-23-14
AUTHORITY TO IMPLEMENT CHANGES)	
TO THE COMPENSATION STRUCTURE)	ERRATA TO THE DIRECT
APPLICABLE TO CUSTOMER ON-SITE)	TESTIMONY OF JARED L.
GENERATION UNDER SCHEDULES 6,)	ELLSWORTH
8, AND 84 AND TO ESTABLISH AN)	
EXPORT CREDIT RATE)	
METHODOLOGY)	
_____)	

Idaho Power Company ("Idaho Power" or "Company") hereby respectfully submits to the Idaho Public Utilities Commission ("Commission") this Errata to the Direct Testimony of Jared L. Ellsworth ("Ellsworth Testimony") in support of the Company's Application to implement changes to its on-site, self-generation tariffs in accordance with

Order No. 35631,¹ to make the following changes to ensure accuracy, consistency, and clarity of the record as follows.

1. The Company recently became aware of a discrepancy in the Ellsworth Testimony filed on May 1, 2023, regarding the source for one of the inputs used to determine the avoided generation capacity component of the Export Credit Rate (“ECR”).

2. More specifically, in describing the resource the Company proposes be utilized as a proxy resource in determining the avoided cost of a generation resource, the Ellsworth Testimony states on page 16 (lines 10-13):

The Company proposes to rely on the levelized fixed cost associated with the least-cost dispatchable resource from the Company’s most recently acknowledged [Integrated Resource Plan]. In the 2021 IRP, that was a simple-cycle combustion turbine (“SCCT”). . .

3. While the current value of the levelized cost of the avoided resource would be based on the 2021 IRP, which does happen to be the Company’s most recently acknowledged Integrated Resource Plan (“IRP”), the statement is not reflective of the Company’s proposed timing for updating this input generally (i.e. based on the most recently *filed* IRP).

4. As described in the Direct Testimony of Grant T. Anderson (“Anderson Testimony”), the Company is proposing that those ECR inputs that are informed by the Company’s IRP be set/updated at its filing, not upon acknowledgment.²

¹ *In the Matter of Idaho Power Company’s Application to Complete the Study Review Phase of the Comprehensive Study of Costs and Benefits of On-Site Customer Generation & for Authority to Implement Changes to Schedules 6, 8, and 84*, Case No. IPC-E-22-22, Order No. 35631 at 31 (Dec. 19, 2022).

² See Anderson Testimony at 30-32.

5. Though not material to the Company's request in this proceeding, for the sake of consistency and clarity of the record the Company provides the following substitution to incorporate within Ellsworth Testimony:

- On page 16, in the answer provided on lines 10 through 13, replace the word "acknowledged" on line 12 with "filed", *to wit:* "The Company proposes to rely on the levelized fixed cost associated with the least-cost dispatchable resource from the Company's most recently acknowledged filed IRP . . ."

This update does not change anything else about the Application or the Ellsworth Testimony.

DATED at Boise, Idaho, this 15th day of August 2023.



MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of August, 2023, I served a true and correct copy of Errata to the Direct Testimony of Jared L. Ellsworth upon the following named parties by the method indicated below, and addressed to the following:

<p>Commission Staff Chris Burdin Deputy Attorney General Idaho Public Utilities Commission 11331 W. Chinden Blvd., Bldg No. 8 Suite 201-A (83714) PO Box 83720 Boise, ID 83720-0074</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email Chris.burdin@puc.idaho.gov</p>
<p>IdaHydro C. Tom Arkoosh ARKOOSH LAW OFFICES 913 W. River Street, Suite 450 P.O. Box 2900 Boise, Idaho 83701</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email tom.arkoosh@arkoosh.com erin.cecil@arkoosh.com</p>
<p>Idaho Conservation League Marie Callaway Kellner Idaho Conservation League 710 North 6th Street Boise, Idaho 83702</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email mkellner@idahoconservation.org</p>
<p>Brad Heusinkveld Idaho Conservation League 710 North 6th Street Boise, Idaho 83702</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email bheusinkveld@idahoconservation.org</p>
<p>Idaho Irrigation Pumpers Association, Inc. Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Avenue, Suite 100 P.O. Box 6119 Pocatello, Idaho 83205</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email elo@echohawk.com</p>

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<p>City of Boise Darrell G. Early Deputy City Attorney Boise City Attorney's Office 150 N. Capitol Blvd. PO Box 500 Boise, Idaho 83701-0500</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email dearly@cityofboise.org boisecityattorney@cityofboise.org</p>
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<p>Kate Bowman Regulatory Director Vote Solar 299 S. Main Street, Suite 1300 PMB 93601 Salt Lake City, UT 84111</p>	<p><input type="checkbox"/> Hand Delivered <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Overnight Mail <input type="checkbox"/> FAX <input type="checkbox"/> FTP Site <input checked="" type="checkbox"/> Email kbowman@votesolar.org</p>



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