

CHRIS BURDIN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0314
IDAHO BAR NO. 9810

Street Address for Express Mail:
11331 W CHINDEN BLVD, BLDG 8, SUITE 201-A
BOISE, ID 83714

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-25-20
AUTHORITY TO IMPLEMENT POWER)	
COST ADJUSTMENT ("PCA") RATES FOR)	
ELECTRIC SERVICE FROM JUNE 1, 2025,)	FIRST PRODUCTION
THROUGH MAY 31, 2026)	REQUEST OF THE
)	COMMISSION STAFF
)	TO IDAHO POWER COMPANY
)	

Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Chris Burdin, Deputy Attorney General, requests that Idaho Power Company ("Company") provide the following documents and information as soon as possible, but no later than **THURSDAY, MAY 1, 2025.**¹

This Production Request is to be considered as continuing, and the Company is requested to provide, by way of supplementary responses, additional documents that it, or any person acting on its behalf, may later obtain that will augment the documents or information produced.

Please provide answers to each question, supporting workpapers that provide detail or are the source of information used in calculations, and the name, job title, and telephone number of

¹ Staff is requesting an expedited response. If responding by this date will be problematic, please call Staff's attorney at (208) 334-0314.

the person preparing the documents. Please also identify the name, job title, location, and telephone number of the record holder.

In addition to the written copies provided as response to the requests, please provide all Excel spreadsheets and electronic files with formulas intact and enabled.

REQUEST NO. 1: Please provide the monthly number of megawatt-hours (“MWh”) associated with the system base and actual net power costs for all Net Power Supply Accounts including Federal Energy Regulatory Commission accounts 501 (Coal), account 536 (Water for power), account 547 (Gas), account 555 (Non-PURPA), account 565 (3rd party transmission), account 447 (Surplus Sales), account 555, (PURPA), and account 555 (Demand Response Incentives).

REQUEST NO. 2: Did the Company re-distribute or smooth base NPSE in this year’s filing? If so, please provide workpapers that reflect the calculations/method used to derive the revenue-smoothed (redistributed) base NPSE included in Exhibit #2 from the Aurora generated NPSE that was last authorized by the Commission for the deferral period for all NPSE accounts. Please include all worksheets with calculations intact.

REQUEST NO. 3: Please provide data on the reservoir levels for the Upper Snake River Basin for both current and 2025 forecasted amounts.

REQUEST NO. 4: Please provide the length of time and amount of production in MWhs lost for forced downtime (unscheduled) that Company-owned generation facilities/units experienced each month during the deferral period. For each forced downtime, please explain the cause and resolution of the downtime.

REQUEST NO. 5: Please provide all occurrences of Company-owned facility unforced downtime (scheduled), during the deferral period for each generation unit. Please also provide the following for each occurrence:

- a. The date range/amount of time planned vs. actual downtime.
- b. The reason for the downtime.

- c. If the actual downtime exceeded the planned amount, please provide the following:
 - i. The cause and resolution for the amount of downtime being greater than planned; and
 - ii. The amount of Megawatt-hours lost due to the actual downtime being greater than planned.


REQUEST NO. 6: Please explain the Company's plan for recovering expenses related to the Kuna Battery Energy Storage System Energy Storage Agreement in the upcoming general rate case (Case No. IPC-E-25-16) and future PCA filings.

REQUEST NO. 7: Please provide the following for Brisbie and the Clean Energy Your Way ("CEYW") resources associated with Brisbie.

- a. Please provide Brisbie's monthly load ramp forecast for the years 2025 through 2030 included in Case No. IPC-E-23-18. Please include monthly forecasted load in MWs and energy in MWhs.
- b. Please provide Brisbie's current monthly load ramp forecast for the years 2025 through 2030. Please include monthly forecasted load in MWs and energy in MWhs.
 - i. Please explain the reasons for any changes in the current monthly load ramp forecast and the load ramp forecast included in Case No. IPC-E-23-18.
- c. Please provide the Brisbie CEYW resources generation forecasts for the years 2025 through 2030 included in Case No. IPC-E-23-18. Please include monthly forecasted generation capacity in MWs and energy in MWhs.
- d. Please provide Brisbie's current CEYW resources generation forecasts for the years 2025 through 2030. Please include monthly forecasted generation capacity in MWs and energy in MWhs.
 - i. Please explain the reasons for any changes in the current generation forecasts and the generation forecasts included in Case No. IPC-E-23-18.
- e. In reference to page 13 of Brady's Direct testimony where it states Pleasant Valley Solar will be coming online in March of 2025. Please provide the commercial operation date of Pleasant Valley Solar. If the Pleasant Valley Solar came online during the deferral period, please provide the amount of MWhs of excess solar

generation and payment amounts, broken down by excess energy and renewable capacity credits, included for each month during the deferral period.

DATED at Boise, Idaho, this 24th day of April 2025.



Chris Burdin
Deputy Attorney General

I:\Utility\UMISC\PRDREQ\IPC-E-25-20 PR #1.docx

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24th DAY OF APRIL 2025, SERVED
THE FOREGOING **FIRST PRODUCTION REQUEST OF THE COMMISSION STAFF**
TO IDAHO POWER COMPANY, IN CASE NO. IPC-E-25-20, BY E-MAILING A COPY
THEREOF, TO THE FOLLOWING:

MEGAN GOICOECHEA ALLEN
DONOVAN E. WALKER
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL:
mgoicoeachaallen@idahopower.com
dwalker@idahopower.com
dockets@idahopower.com

MATTHEW T. LARKIN
TIMOTHY E. TATUM
JESSI BRADY
IDAHO POWER COMPANY
PO BOX 70
BOISE ID 83707-0070
E-MAIL: mlarkin@idahopower.com
ttatum@idahopower.com
jbrady@idahopower.com


PATRICIA JORDAN, SECRETARY