

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE IDAHO	)	CASE NO. IPC-E-26-15
HYDROELECTRIC POWER PRODUCERS	)	
TRUST’S PETITION FOR IDAHO POWER	)	NOTICE OF PETITION
COMPANY TO REDUCE ITS OPERATION	)	
AND MAINTENANCE CHARGES	)	NOTICE OF INTERVENTION
APPLICABLE TO SCHEDULE 72,	)	DEADLINE
GENERATOR INTERCONNECTIONS TO	)	
PURPA QUALIFYING FACILITY SELLERS	)	ORDER NO. 37097
	)	

On May 19, 2026, the Idaho Hydroelectric Power Producers Trust (“IdaHydro” or “Petitioner”) petitioned the Idaho Public Utilities Commission (“Commission”) requesting to update Idaho Power Company’s (“Company”) operation and maintenance (“O&M”) charges applicable to Schedule 72, generator interconnections to Public Utilities Regulatory Act (“PURPA”) qualifying facilities (“QFs”) sellers (“Schedule 72”) to actual costs (“Petition”).

The Commission now issues this Notice of Petition and sets deadlines by which interested persons may intervene.

BACKGROUND

On May 8, 2025, the Company applied seeking re-examination of the O&M charges under Schedule 72, with the revised charges to become effective January 1, 2026. Case No. IPC-E-25-22, Order No. 36894 at 1. In response, IdaHydro did not dispute the Company’s proposed updates to the inputs or calculations used to determine the Schedule 72 O&M charges. *Id.* at 5. Instead, it challenged the underlying methodology that the Commission previously approved for calculating those charges. *Id.* IdaHydro contended that the system-average approach relies on what it described as “phantom costs based on averages.” *Id.* It further asserted that the Company does not separately record actual O&M expenses attributable to individual QFs but rather includes those expenses within broader plant accounting categories. *Id.* IdaHydro believed that because actual O&M costs are not tracked at the QF level, there is no reliable means of determining whether the resulting charges accurately reflect the incremental O&M costs incurred beyond the Company’s ordinary utility operations. *Id.*

The Commission rejected IdaHydro's challenge in that proceeding, finding that Case No. IPC-E-25-22 was limited to updating the inputs used in the existing O&M charge calculation and was not intended to revisit the validity of the Commission-approved methodology. *Id.* at 12. The Commission explained that any party seeking reconsideration of the system-average methodology could request that the Commission open a separate proceeding dedicated to that issue. *Id.* The Commission also recognized that any alternative methodology, including one based on directly assigning actual O&M costs, warrants careful examination and consideration of its broader regulatory and operational impacts before being adopted. *Id.*

NOTICE OF PETITION

YOU ARE HEREBY NOTIFIED that the Petitioner requested the Commission re-examine the Company's system-average methodology used to calculate Schedule 72 O&M charges for PURPA QFs. Petition at 2.

YOU ARE FURTHER NOTIFIED that the Petitioner claims that the methodology currently employed is inconsistent with the law because the interconnection charges are not derived from the actual incremental O&M expenses attributable to a specific QF. *Id.* The Petitioner also claims that the methodology improperly includes costs that the Company would have incurred even in the absence of the interconnection and fails to satisfy PURPA's requirement that ratepayers be held financially neutral. *Id.* The Petitioner objects the Company's methodology of calculating the O&M charges using system-wide averages and generalized assumptions, despite acknowledging that it does not maintain records of actual O&M expenses for individual interconnections in a manner that allows those costs to be independently verified. *Id.*

YOU ARE FURTHER NOTIFIED that the Petitioner requests the Commission re-examine the Company's Schedule 72 O&M methodology, as contemplated in Order No. 36894; determine that the Company may not continue to justify Schedule 72 O&M charges solely through a system-average methodology; require the Company to develop and maintain accounting sufficient to identify direct-assigned actual O&M costs by facility, together with any legitimate shared administrative or overhead costs associated with interconnection maintenance, and to justify any allocation of such shared costs; and require that any future Schedule 72 O&M charges be tied to actual excess interconnection costs, consistent with 18 C.F.R. § 292.101 and the principles recognized by this Commission in Order No. 15746. *Id.* at 23.

YOU ARE FURTHER NOTIFIED that the Petition is available for public inspection during regular business hours at the Commission's office. The Petition is also available on the Commission's website at www.puc.idaho.gov. Click on the "ELECTRIC" icon, select "Open Cases," and click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code, and that all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq.*

NOTICE OF INTERVENTION DEADLINE

YOU ARE FURTHER NOTIFIED that persons desiring to intervene in this matter to obtain parties' rights of participation must file a Petition to Intervene with the Commission pursuant to this Commission's Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and -.073. **Persons who wish to intervene as a party must file a Petition to Intervene no later than 21 days after the date of service of this Order.** Such persons shall also provide the Commission Secretary with their email address to facilitate further communications. After the intervention deadline runs, the Commission Secretary shall issue a Notice of Parties that identifies the parties and assigns exhibit numbers to each party. Once the Notice of Parties has issued, Commission Staff shall informally confer with the Company and any intervening parties about how to further process this case and shall then report back to the Commission on a proposed case schedule.

YOU ARE FURTHER NOTIFIED that persons who would like to present their views without parties' rights of participation and cross-examination do not have to intervene but may present their views by submitting written comments to the Commission.

YOU ARE FURTHER NOTIFIED that the following people are designated as the Petitioner's representatives in this matter:

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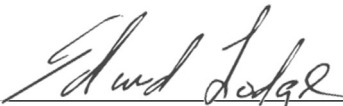
ORDER

IT IS HEREBY ORDERED that persons desiring to intervene in this matter must file a Petition to Intervene no later than 21 days from the service date of this Order. Once the deadline has passed, the Commission Secretary shall prepare and issue a Notice of Parties.

IT IS FURTHER ORDERED that, after the Notice of Parties has issued, Commission Staff shall confer with the parties regarding a procedural schedule for this matter including, if necessary, a hearing in this matter.

IT IS FURTHER ORDERED that parties comply with Order No. 35375, issued April 21, 2022. Generally, all pleadings should be filed with the Commission electronically and will be deemed timely filed when received by the Commission Secretary. *See* Rule 14.02. Service between parties should continue to be accomplished electronically when possible. However, voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 13th day of July 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary

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