



Idaho Public Utilities Commission

P.O. Box 83720, Boise, ID 83720-0074

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2023 MAY 15 PM 3:23

IDAHO PUBLIC UTILITIES COMMISSION

Brad Little, Governor

Eric Anderson, President

John R. Hammond, Jr., Commissioner

Edward Lodge, Commissioner

May 15, 2023

Jan Noriyuki
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720

Dear Ms. Noriyuki:

The Staff of the Idaho Public Utilities Commission identified a typographical error in Staff Comments filed on May 10, 2023 in Case No. PAC-E-23-09. The comma placement in the table on page 9 makes the totals more difficult to read. Therefore, Staff is filing a Replacement Page to the May 10, 2023 Staff Comments which corrects the typographical error.

Sincerely,

Terri Carlock
Administrator Utilities Commission

1. A comparison of costs used to determine NPC in base rates to actual cost broken down by sources the Company uses to meet load;
2. A comparison of the amount of generation from each source used to determine NPC in base rates versus the amount of generation used to meet load during the ECAM year;
3. A comparison of the actual monthly amounts of coal generation across the 2022 ECAM year to historical amounts; and
4. Information contained in discovery and from other sources to identify the root cause leading to lack of coal generation.

Staff compared 2022 actual NPC by FERC account/resource type to NPC embedded in base rates, as shown in Table No. 2 below. It illustrates the impact of actual NPC on the deferral amount with positive amounts showing an increase in the deferral and negative amounts showing a decrease.

Table No. 2:

Source	Adjusted Actual NPC	Base NPC ⁴	Impact to Deferral	Percentage Impact
Wholesale Sales (revenue)	(\$285,405,303)	(\$463,692,258)	\$178,286,955 ⁵	38.4%
Purchased Power / Net Interchange (cost)	\$942,771,832	\$844,451,804	\$98,320,028	11.6%
Wheeling (cost)	\$164,088,727	\$154,137,105	\$9,951,622	6.5%
Coal (cost)	\$581,031,513	\$599,876,421	(\$18,844,908)	-3.1%
Gas (cost)	\$610,525,466	\$228,727,764	\$381,797,702	166.9%
Other - Primarily Wind (cost)	\$5,382,209	\$4,416,584	\$965,625	21.9%
Total System	\$2,018,394,444	\$1,367,917,419	\$650,477,024	47.6%

Examining Table No. 2, the largest impacts to the deferral amount in order of magnitude is the increase in natural gas generation, a reduction in the amount of wholesale sales revenue, and an increase in purchased power expense. However, there is a significant reduction in the

⁴ Referenced to Case No. PAC-E-21-07 PacifiCorp -General Rate Case.

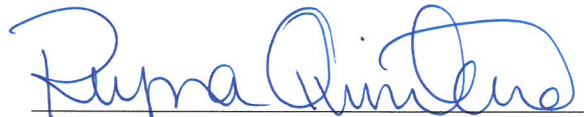
⁵ The positive amount for the wholesale sales base-to-actual difference represents a reduction in revenue from the total actual amount of sales relative to the base amounts; whereas positive amounts for base-to-actual cost components represent increases in actual cost as compared to base amounts.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15th DAY OF MAY 2023, SERVED THE FOREGOING **REPLACEMENT PAGE 9 TO COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-23-09, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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SECRETARY