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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the Industrial Customers of Idaho Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE) **CASE NOS. IPC-E-14-41**
APPLICATION OF PACIFICORP DBA) **PAC-E-14-11**
ROCKY MOUNTAIN POWER AND)
IDAHO POWER COMPANY FOR AN)
ORDER AUTHORIZING THE) COMMENTS OF THE INDUSTRIAL
EXCHANGE OF CERTAIN) CUSTOMERS OF IDAHO POWER
TRANSMISSION ASSETS

I. INTRODUCTION AND SUMMARY

Pursuant to the Idaho Public Utilities Commission’s (“IPUC” or “Commission”) Order No. 33231, the Industrial Customers of Idaho Power (“ICIP”) hereby submit these comments on the Joint Application of PacifiCorp and Idaho Power Company (“Idaho Power”) in this docket. Idaho law requires the Commission to reject the Joint Application if the Commission cannot find that the transaction will leave Idaho Power’s ratepayers unharmed. Given the complexity of the transaction, the ICIP has concerns with the transaction’s potential to result in increased retail rates for Idaho Power’s ratepayers without providing any countervailing benefit that Idaho Power and its shareholders are willing to acknowledge and/or share with ratepayers.

Based upon the state of the record at this time, the ICIP makes two alternative recommendations. First, the ICIP recommends that the Commission defer ruling on the Joint Application until after the Federal Energy Regulatory Commission (“FERC”) issues its order on