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March 19, 2015

IDAHO PUBLIC
UTILITIES COMMISSION

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

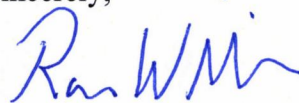
Re: IPC-E-15-01

Dear Ms. Jewell:

Enclosed please find an original and seven copies of the Renewable Energy Coalition's (REC) Response to Joint Petition and Cross Petition for Clarification of Clearwater Paper and Simplot.

Please call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr
Enclosures
cc: Service List

qualifying facilities (“QFs”), and should only apply to new intermittent wind and solar projects above the rate eligibility cap. In support of this response, REC states as follows:

On January 30, 2015, Idaho Power Company (“Idaho Power”) filed its application seeking to reduce the contract term for new QFs above the rate eligibility cap. In Order No. 33222, the Commission adopted interim relief that reduced the maximum term for all new QF contracts to five years. In response to a Petition to Clarify of the Intermountain Energy Partners and the Cross Petition of REC, the Commission clarified and revised Order No. 33222. Specifically, in Order No. 33523, the Commission clarified that the five-year term limit does “not apply to new PURPA contracts eligible for published rates.”

Clearwater/Simplot have also requested that the Commission clarify that Order No. 33222 should state that the “the maximum contract term for Idaho Power’ new PURPA intermittent (wind and solar powered) contracts shall be five years”

Clearwater/Simplot point out that the alleged problems identified by Idaho Power are entirely attributable to wind and solar QFs above the rate eligibility cap.

Clearwater/Simplot also explain that the Commission’s interim relief should not apply to baseload QFs because Idaho Power has not claimed these projects are causing any problems.

REC is not taking a position at this time in regarding the merits of Idaho Power’s claims that new intermittent wind and solar QFs are causing major problems, but REC agrees that Idaho Power has raised serious issues and concerns that warrant further investigation. REC also does not oppose the Commission’s adoption of interim relief,

and recommends that any relief be narrowly tailored to address the specific problems that Idaho Power claims it is experiencing.

Idaho Power has not submitted sufficient evidence that any baseload QFs are contributing to its potential problems associated with the acquisition of large amounts of unneeded variable wind and solar generation. Baseload QFs have long been a valuable, but small, part of Idaho Power's resource portfolio, and they will continue to provide reliable and consistent energy and capacity. Therefore, the Commission should limit any interim relief to only new intermittent wind and solar QFs above the rate eligibility cap.

WHEREFORE, REC respectfully requests that the Commission grant the Clearwater/Simplot Joint Petition and Cross Petition for Clarification limiting the interim relief that shortened the maximum contract term to five years so that it only applies to proposed intermittent wind and solar QF projects that exceed the published rate eligibility cap.

Dated this 19th day of March, 2015.

Respectfully submitted,



Ronald L. Williams,
Williams Bradbury, P.C.
Attorneys for REC

CERTIFICATE OF DELIVERY

I HEREBY CERTIFY that on this 19 day of March, 2015, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

Donovan E. Walker
Idaho Power Company
1221 West Idaho Street
PO Box 70
Boise, ID 83707
E-Mail: dwalker@idahopower.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Peter J. Richardson
Gregory M. Adams
Richardson Adams, PLLC
PO Box 7218
Boise, ID 83702
E-Mail: peter@richardsonadams.com
greg@richardsonadams.com
Attorneys for J.R. Simplot Company

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
E-Mail: dreading@mindspring.com
J.R. Simplot Company

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
E-Mail: botto@idahoconservation.org

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Dean J. Miller
McDevitt & Miller LLP
420 West Bannock Street
PO Box 2564 -83701
Boise, ID 83702
E-Mail: joe@mcdevitt-miller.com
Attorneys for Intermountain Energy Partners, LLC

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Leif Elgethun, PE, LEED AP
Intermountain Energy Partners, LLC
PO Box 7354
Boise, ID 83707
E-Mail: leif@sitebasedenergy.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Kelsey Jae Nunez
Snake River Alliance
223 N. 6th Street, Suite 317
PO Box 1731
Boise, ID 83701
E-Mail: knunez@snakeriveralliance.org

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Daniel E. Solander
Sr. Counsel
Rocky Mountain Power
201 South Main Street, Suite 2400
Salt Lake City, UT 84111
E-Mail: daniel.solander@pacificorp.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Ted Weston
ID Regulatory Affairs Manager
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, UT 84111
E-Mail: ted.weston@pacificorp.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Data Requests: datarequest@pacificorp.com

- Electronic Transmission

C. Tom Arkoosh
Arkoosh Law Offices
802 W. Bannock Street, Suite 900
PO Box 2900
Boise, ID 83701
E-Mail: tom.arkoosh@arkoosh.com
**Attorneys for Twin Falls Canal Company, North
Side Canal Company and American Falls Reservoir
District No. 2**

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

John Lowe
Renewable Energy Coalition
12050 S.W. Tremont Court
Portland, OR 97225
E-Mail: jravenesanmarcos@yahoo.com

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Irion Sanger
Sanger Law, P.C.
1117 SW 53rd Avenue
Portland, OR 97215
E-Mail: irion@sanger-law.com
Co-Counsel for Renewable Energy Coalition

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission

Scott Dale Blickenstaff
1951 S. Saturn Way, Suite 100
Boise, ID 83702
E-Mail: sblickenstaff@amalsugar.com
Attorney for Amalgamated Sugar Company LLC

- Hand Delivery
- US Mail (postage prepaid)
- Facsimile Transmission
- Federal Express
- Electronic Transmission



Ronald L. Williams