

**Bernard J. Zahren, CEO**  
**ZAHREN FINANCIAL CO., LLC**  
MANAGER of CLEAN FEET INVESTORS I, LLC



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2015 JUN 22 AM 9:35

IDAHO PUBLIC  
UTILITIES COMMISSION

June 17, 2015

Idaho Public Utilities Commission

P. O. Box 83720

Boise, Idaho 83720-3762

RE: IPC-E-15-01

Dear Commissioners:

Thank you for the opportunity to comment on Idaho Power's filing with the PUC in the above referenced docket. As managers of a financial services company that invests in clean energy projects throughout the United States, we are concerned about the decision before you. While we currently have no investments in Idaho, a decision to shorten the length of PURPA contracts from the current 20-year period to 2 years would dramatically impact our ability, or that of any other investor, to invest in Idaho. With investors putting over \$40 Billion to work in clean energy every year can Idaho afford to jeopardize any investment opportunity?


Development of any new energy project has high upfront capital costs. Long-term contracts, therefore, are essential to financing. This is especially true for clean energy projects, which have low to negligible fuel costs, and are therefore almost fully financed upfront. When evaluating the length of contract necessary to finance a project we consider the price, the risk of performance, and the useful life of the project. With Idaho's low avoided costs, contract terms of at least 20 years are essential to even consider making an investment. Contract lengths of two years, or even a compromise length of five or ten years, would make it impossible for any project in Idaho to meet our thresholds as a viable investment.

On the other hand, long-term fixed price electricity contracts provide stable, predictable energy costs for utilities and customers. With Idaho's low avoided costs the utility should be locking in these favorable opportunities to mitigate the risk of volatility in natural gas costs and wholesale electricity. This provides benefits to the citizens of Idaho, not only from an environmental, but also from an economic standpoint. You cannot decrease your

dependence on dirty, volatile energy sources without the proper mechanisms to build and finance new, clean, local sources of energy.

For these reasons, we believe it is in Idaho's best interest for you to reject Idaho Power's proposal.

Sincerely,



Bernard J. Zahren

CEO, Zahren Financial Co.

Manager, Clean Feet Investors I, LLC



Jigar Shah

Founder, CEO SunEdison

Co-Founder/President, Generate Capital

*Bernard Zahren is Manager of Clean Feet Investors I, LLC and Chair of the Avon, CT Clean Energy Commission. Jigar Shah, his partner at Clean Feet, was Founder and CEO of SunEdison (the largest solar services company in the world) and Founding CEO of The Carbon War Room.*



June 22, 2015

Idaho Public Utilities Commission  
P.O. Box 83720  
472 West Washington  
Boise, ID 83720

RECEIVED  
2015 JUN 22 PM 4:52  
IDAHO PUBLIC  
UTILITIES COMMISSION

Dear Commissioners,

As one of the Magic Valley's largest employers and occupying one of the largest facilities, the College of Southern Idaho supports Idaho Power's request to review the guaranteed contract length for PURPA requirements that regulated utilities purchase energy from qualified renewable generation projects at a fixed rate for 20 years.

CSI serves roughly 8,000 students in the eight-county service region of the Magic Valley. College facilities include the 330 acre main campus in Twin Falls, off campus sites in the city, physical sites in outreach centers in Jerome, Hailey, Gooding, Burley, and Idaho Falls. Utility costs tend to loom large for us, and as rates rise, we strive to keep education affordable and accessible. If we can assist in keeping electrical rates down, it assists in keeping costs down for students.

CSI favors clean and renewable energy, and the college also supports a balanced regulatory approach, one that reflects a contemporary 2015 base. The current Public Utility regulatory Act of 1978 is over 30 years old, and it is time to review the model.

Thank you,

Dr. Jeff Fox  
President



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2015 JUN 22 PM 3:17  
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UTILITIES COMMISSION

June 22, 2015

Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074

Re: Idaho Power's request to limit solar and wind contract lengths

Dear Commissioners,

Rite Stuff Foods supports Idaho Power's request to shorten the length of guaranteed contracts for large solar and wind generation projects.

The cost of electric power is an important component in the cost of products we produce in Idaho. Keeping power costs low is of great importance in keeping our Idaho business competitive in the world market.

We don't believe Idaho Power should be required to buy electricity it does not need. We support limiting the length of large solar and wind contracts to two years.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Madden", written over a light blue horizontal line.

Jim Madden  
General Manager  
Rite Stuff Foods

Dr. Craig W. Nickisch  
4161 Bannock Highway  
Pocatello, ID 83204-4525

RECEIVED  
2015 JUN 22 AM 9:34  
IDAHO PUBLIC UTILITIES COMMISSION  
18 June 2015

Idaho Public Utilities Commission  
P. O. Box 83720  
Boise, Idaho 83720-0074

Dear Commissioners:

I am moved to write in support of Idaho Power Company's requests to the Commission in the current matter of PURPA contract conditions. In a word, it is my contention that your substantive approval of Idaho Power's request will be in the best interest of Idaho's consumers, both residential and commercial.

In the matter of PURPA itself, I was once told by a very wise mentor that "like doctrine, regulations are promulgated with commitment, even fervor - but they must be administered with judgement." Furthermore, he reminded us that, over time, commercial and cultural changes cause each regulatory requirement to become less directly applicable to the questions it was intended to address. That may well apply in this matter, and I am most appreciative of the Commission's judgement in finding an optimal contextual resolution of the matter at table.

I will refrain from addressing the specific aspects of Idaho Power Company's request, for you will certainly hear much about each of them in the upcoming hearings.

In sum, however, the proposals made by Idaho Power, and taken in context, stand the test of reason. They will allow a very reputable and conscientious organization to continue providing Idaho citizens and businesses with an essential resource at prices which support economic growth and our fine quality of life.

I sincerely appreciate your consideration.

With best regards,



Craig W. Nickisch, PhD  
Colonel, USA, Retired  
Professor Emeritus, Idaho State University