

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSIONER ANDERSON  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL

**FROM:** EDWARD JEWELL  
DEPUTY ATTORNEY GENERAL

**DATE:** JANUARY 22, 2020

**SUBJECT:** IN THE MATTER OF IDAHO POWER COMPANY'S PETITION TO ESTABLISH AVOIDED COST RATES APPLICABLE TO PURPA ENERGY STORAGE QUALIFYING FACILITIES; CASE NO. IPC-E-20-02.


On January 21, 2020, Idaho Power Company ("Company") filed a petition to determine avoided cost rates, contract terms, and conditions for energy storage qualifying facilities ("QFs") under the Public Utility Regulatory Policies Act of 1978. The Company proposes a 100 kW project eligibility cap for energy storage QFs to qualify for published avoided cost rates and 20-year contracts, and proposes energy storage QFs larger than 100 kW be eligible for Integrated Resource Plan avoided cost rates and two year contracts. Petition at 2. The Company files its Petition in response to a federal District Court of Idaho Memorandum Decision and Order issued January 17, 2020, regarding the Commission's determination that Franklin Energy Storage 1-4 were subject to the same terms and conditions as solar QFs. *See id.* at 4-5.

### STAFF RECOMMENDATION

Staff recommends the Commission issue a Notice of Application and establish a 21-day intervention period.

### COMMISSION DECISION

Does the Commission wish to issue a Notice of Application and establish a 21-day intervention period?

  
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Edward J. Jewell  
Deputy Attorney General

