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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COMMISSION
STAFF'S PETITION TO UPDATE INPUTS
TO THE COLSTRIP METHOD AND TO
DISCONTINUE THE SUMAS METHOD

)
) CASE NO. IPC-E-20-24 / *AVU-E-20-04*
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)
) COMMENTS OF IDAHO POWER
) COMPANY
)
)
)
)

Idaho Power Company ("Idaho Power" or "Company"), in accordance with RP 201, *et seq.*, and the applicable provisions of the Public Utility Regulatory Policies Act of 1978 ("PURPA"), as well as the Idaho Public Utilities Commission's ("IPUC" or "Commission") Notice of Modified Procedure in this matter, Order No. 34674, hereby respectfully submits the following Comments.

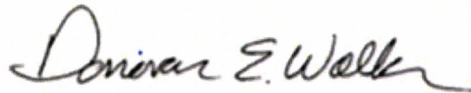
On May 14, 2020, Commission Staff filed a Petition requesting a Commission Order to implement an updated avoided cost based on the Colstrip Method for determining the adjustable portion of avoided cost rates under PURPA. The Colstrip Method was established by the Commission in Order No. 28708 and applies to certain

contracts with PURPA Qualifying Facilities ("QFs") executed from 1990 to 1995.

The Company has reviewed Commission Staff's revision to the adjustable portion of the avoided cost rate for existing PURPA contracts that utilize the Colstrip Method. Idaho Power agrees that the calculations used by the Staff for Idaho Power Company are consistent with IPUC Order No. 28708. Idaho Power has 6 contracts that utilize the Colstrip Method, the last of which will expire in September 2030.

Idaho Power confirms it has no effective PURPA contracts that utilize the Sumas Method and agrees the Commission should discontinue pricing requirements specific to the Sumas Method.

Respectfully submitted this 11th day of June, 2020.




DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of June, 2020, I served a true and correct copy of the within and foregoing COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

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

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email secretary@puc.idaho.gov



Christy Davenport, Legal Assistant