

C. Tom Arkoosh, ISB No. 2253  
ARKOOSH LAW OFFICES  
913 W. River Street, Suite 450  
P.O. Box 2900  
Boise, ID 83701  
Telephone: (208) 343-5105  
Facsimile: (208) 343-5456  
Email: [tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)  
Admin copy: [erin.cecil@arkoosh.com](mailto:erin.cecil@arkoosh.com)

Attorneys for IdaHydro

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY’S FOR )  
APPROVAL OR REJECTION OF THE )  
SECOND AMENDMENT TO THE )  
ENERGY SALES AGREEMENT WITH )  
MC6 HYDRO LLC FOR THE SALE AND )  
PURCHASE OF ELECTRIC ENERGY )  
FROM THE MC6 HYDRO PROJECT. )

Case No. IPC-E-21-30  
**MC6 HYDRO LLC’S PETITION FOR  
CROSS-RECONSIDERATION**

Comes now MC6 Hydro LLC, an Idaho limited liability company (“MC6”), by and through its counsel of record, C. Tom Arkoosh of Arkoosh Law Offices, pursuant to Rule 331, and files this *Petition for Cross-Reconsideration* in support of the *Petition for Reconsideration* (“*Reconsideration*”) filed by Idaho Power Company in the instant docket.

MC6 concurs with the *Reconsideration*. MC6 is in the process of amending the nameplate capacity of the project generator to 2.1 megawatts (MW).

MC6 urges the Commission to set a reasonable materiality threshold for contracts at *de minimum* variance with the machinery name plate capacity on a project. From the experience of this developer, a variation of 1 MW or less in actual nameplate capacity, when compared to the legal and administrative costs incurred by Idaho Power Company, the developer, and the Commission, insistence upon an exact match-up between nameplate capacity and contract values, is wasteful. Further, for the most part, the magnitude of these variances has proven to be

“noise” in the utility’s system, thus not affecting rate payers.

DATED this 5<sup>th</sup> day of January 2022.

ARKOOSH LAW OFFICES



---

C. Tom Arkoosh  
Attorney for IdaHydro

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on the 5<sup>th</sup> day of January 2022, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

|                                     |              |  |
|-------------------------------------|--------------|--|
| Commission Secretary                | _____        | U.S. Mail, Postage Prepaid   |
| Idaho Public Utilities Commission   | _____        | Overnight Courier  |
| 11331 W. Chinden Blvd., Building 8, | _____        | Hand Delivered   |
| Suite 201-A                         | _____        | Via Facsimile  |
| P.O. Box 83720                      | <u>  X  </u> | E-mail:  |
| Boise, ID 83720-0074                |              | <a href="mailto:secretary@puc.idaho.gov">secretary@puc.idaho.gov</a> |

|                                   |              |  |
|-----------------------------------|--------------|--|
| Riley Newton                      | _____        | U.S. Mail, Postage Prepaid   |
| Deputy Attorney General           | _____        | Overnight Courier  |
| Idaho Public Utilities Commission | _____        | Hand Delivered   |
| P.O. Box 83720                    | _____        | Via Facsimile  |
| Boise, ID 83720-0074              | <u>  X  </u> | E-mail:  |
|                                   |              | <a href="mailto:riley.newton@puc.idaho.gov">riley.newton@puc.idaho.gov</a> |

**Idaho Power:**

|                                |              |  |
|--------------------------------|--------------|--|
| Donovan E. Walker              | _____        | U.S. Mail, Postage Prepaid   |
| Regulatory Dockets             | _____        | Overnight Courier  |
| Idaho Power Company            | _____        | Hand Delivered   |
| 1221 West Idaho Street (83702) | _____        | Via Facsimile  |
| P.O. Box 70                    | <u>  X  </u> | E-mail:  |
| Boise, ID 83707                |              | <a href="mailto:dwalker@idahopower.com">dwalker@idahopower.com</a>                 |
|                                |              | <a href="mailto:dockets@idahopower.com">dockets@idahopower.com</a>                 |
|                                |              | <a href="mailto:energycontracts@idahopower.com">energycontracts@idahopower.com</a> |



---

C. Tom Arkoosh