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IDAHO PUBLIC
UTILITIES COMMISSION

MEGAN GOICOECHEA-ALLEN
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December 9, 2022

VIA ELECTRONIC FILING

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-22-06
In the Matter of Idaho Power Company's Application for Approval of a
Replacement Special Contract with Micron Technology, Inc. and A Power
Purchase Agreement with Black Mesa Energy, LLC

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power's Motion for Extension of Time to Make Compliance Filing in the above-entitled matter.

Please feel free to contact me directly with any questions you might have about this filing.

Very truly yours,

Megan Goicoechea-Allen

MGA:cd
Enclosure

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR) CASE NO. IPC-E-22-06
APPROVAL OF A REPLACEMENT)
SPECIAL CONTRACT WITH MICRON) IDAHO POWER COMPANY'S
TECHNOLOGY, INC. AND A POWER) MOTION FOR EXTENSION OF
PURCHASE AGREEMENT WITH BLACK) TIME TO MAKE COMPLIANCE
MESA ENERGY, LLC.) FILING
)
)

COMES NOW, Idaho Power Company ("Idaho Power" or "Company") and moves the Idaho Public Utilities Commission ("Commission") for an order granting additional time for the Company to make its compliance filing in this case as directed by the Commission in Order No. 35532. The grounds and reasons for this request are as follows:

1. On August 1, 2022, the Commission issued its ruling on Idaho Power's Application seeking approval, of the Revised Special Contract ("Micron ESA") with Micron Technology, Inc. ("Micron"). In pertinent part, Order No. 35482, directed modifications to the Micron ESA, including use of a new method for calculating renewable capacity

credit(s) (“RCCs”), and instructed the Company to file an updated ESA and Schedule 26 as a result.

2. The Company filed a Petition for Clarification and Reconsideration on August 22, 2022, which, among other things, sought clarification on how to calculate the renewable capacity credit(s) (“RCCs”) under the Micron ESA. In granting the Company’s Petition, the Commission noted that the method of calculating the RCC that it directed with respect to the Micron ESA departed from traditional Integrated Resource (“IRP”)-based methodologies and incorporated new methods. Accordingly, the Commission found it would be beneficial to have the Company and Staff “work together to develop a rate structure for calculating Micron’s RCC under the ESA which the Company shall file as a compliance filing in this case by December 13, 2022.” Order No. 35532, p. 10.

3. Following the issuance of Order No. 35532, the Company and Staff have worked together in good faith to fulfill the Commission’s mandate, participating in five meetings between November 2, 2022, and December 8, 2022, during which the parties engaged in open dialogue and exchanged information and ideas with a goal of implementing the Commission’s intent for the treatment of RCCs under the ESA.

4. As a result of these efforts, Staff and the Company have agreed on the basic parameters of the rate structure for calculating Micron’s RCC, but additional time is needed to work through some of the details and finalize the understanding.

5. In order to provide it with adequate time to prepare a considered and appropriate compliance filing, Idaho Power respectfully requests that the Commission issue an order extending the deadline for the Company to make its compliance filing by 10 days, from December 13th to December 23rd.

6. Idaho Power contacted Staff, regarding this request for extension and was advised that Staff has no objection to extending the deadline for the Company's compliance filing.

Respectfully submitted this 9th day of December 2022.

A handwritten signature in black ink that reads "Megan Goicoechea Allen". The signature is written in a cursive style with a large initial 'M' and 'A'.

MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 9th day of December 2022, I served a true and correct copy of the foregoing Idaho Power Company's Motion for Extension of Time to Make Compliance Filing upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff
Riley Newton
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Christy Davenport
Legal Administrative Assistant