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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR APPROVAL) **CASE NO. IPC-E-22-19**
OR REJECTION OF THE SECOND)
AMENDMENT TO ITS ENERGY SALES)
AGREEMENT WITH AMERICAN FALLS) **COMMENTS OF THE**
SOLAR, LLC) **COMMISSION STAFF**
)
)
)

Staff of the Idaho Public Utilities Commission ("Staff"), by and through its attorney of record, Riley Newton, Deputy Attorney General, and submits the following comments.

BACKGROUND

On June 14, 2022, Idaho Power Company ("Company") filed an Application with the Commission requesting approval of the Second Amendment to its Energy Sales Agreement ("ESA") with American Falls Solar, LLC ("Seller") who sells energy generated by the Seller's 20-megawatt solar photovoltaic project ("Facility") located in Power County, Idaho. The Facility is a qualifying facility ("QF") under the Public Utility Regulatory Policies Act of 1978 ("PURPA").

The Second Amendment seeks to delete Section 6.2.2 of the ESA and replace it with a new Section 6.2.2, which modifies the timeframe for adjusting the monthly estimated Net Energy

Amount (“NEA”). The new timeframe allows the Seller to make adjustments by the 25th day of the preceding month in which a change is requested. The Second Amendment does not change any other obligations of the parties or provisions of the ESA.

STAFF REVIEW

Staff has reviewed the Application and recommends approval of the five-day advanced notice because monthly estimates provided closer to the time of delivery can improve the accuracy of input used for short-term operational planning. In addition, the five-day advanced notice has been authorized in prior Commission Order Nos. 34263, 34870 and 34937.

STAFF RECOMMENDATION

Staff recommends that the Commission approve the Second Amendment to the ESA, as filed on June 14, 2022.

Respectfully submitted this 14th day of July 2022.



Riley Newton,
Deputy Attorney General

Technical Staff: Yao Yin

i:umisc/comments/ipce22.14rnyy comments

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 14TH DAY OF JUNE 2022, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-22-19, BY E-MAILING A COPY THEREOF, TO THE FOLLOWING:

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SECRETARY