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March 17, 2023

VIA ELECTRONIC MAIL

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 West Chinden Blvd., Building 8
Suite 201-A
Boise, Idaho 83714

Re: Case No. IPC-E-23-02
Bypass Hydro Project
Idaho Power Company's Application re Energy Sales Agreement with
North Side Energy Company, Inc.

Dear Ms. Noriyuki:

Attached for electronic filing is Idaho Power Company's Motion for Extension of Time to File Reply Comments in the above-entitled matter. If you have any questions about the attached documents, please do not hesitate to contact me.

Very truly yours,



Megan Goicoechea Allen

MGA:cld
Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF IDAHO POWER COMPANY FOR)	CASE NO. IPC-E-23-02
APPROVAL OR REJECTION OF AN)	
ENERGY SALES AGREEMENT WITH)	IDAHO POWER COMPANY'S
NORTH SIDE ENERGY COMPANY, INC.)	MOTION FOR EXTENSION OF
FOR THE SALE AND PURCHASE OF)	TIME TO FILE REPLY COMMENTS
ELECTRIC ENERGY FROM THE BYPASS)	
HYDRO PROJECT.)	
_____)	

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 file its Reply Comments pursuant to the Notice of Modified Procedure, Order No. 35676. The grounds and reasons for this request are as follows:

1. On March 13, 2023, Staff filed its Comments relative to the proposed replacement Energy Sales Agreement ("ESA" or "Agreement") between Idaho Power and North Side Energy Company, Inc. ("North Side" or "Seller"), for energy generated by the Bypass Hydro Project, which is a qualifying facility ("QF" or "Facility") under the Public Utility Regulatory Policies Act of 1978 ("PURPA"). In reviewing the ESA, Staff focused on

the following: Section B-7 Designated Network Resource (“DNR”), Facility nameplate capacity, capacity payments, avoided cost rates, and Article XXIII Modification. While Staff did not identify any issues related to capacity payments or avoided cost rates, it did make several recommendations to update the ESA, some of which are agreeable to Idaho Power but others warrant additional consideration.

2. More specifically, some of Staff’s recommendations have broader implications beyond this specific case and overlap with the Commission’s directives set forth in Order No. 35705, also issued on March 13, 2023, in the case pertaining to the Lowline #2 Hydro Project (Case No IPC-E-22-28). Both cases address a previously heretofore standard PURPA ESA provision related to possible QF modifications and identify shortcomings with both the Company’s existing and proposed contract language. In light of the Commission’s Order, which directed the Company to add additional language to more clearly and explicitly incorporate the Commission’s objectives, Idaho Power has been considering the issues raised and determining how to fulfill the Commission’s intent in both cases and in ESAs moving forward but needs additional time to ensure a cohesive and expedient approach.

3. In addition, the Company is considering the recommendation (and directive in Case No. IPC-E-22-28) that the Company only be allowed to include net power supply expenses in its Power Cost Adjustment (“PCA”) that reflect the proper authorized rate for all energy delivered as of the first operation date as a modified QF *regardless* of what is paid to the QF. The Company needs more time to evaluate how to mitigate and address the far reaching ramifications and detrimental impact of the cost recovery disallowances that could result under this proposition.

4. Because the ESA with North Side contains similar provisions as the Lowline #2 Hydro Project ESA, the Reply Comments in the instant case will address many of the same issues raised by the Commission's decision in that matter and must be evaluated in concert with the Company's forthcoming compliance filing. In both cases, Idaho Power believes it would be useful to work with Staff in an effort to reach alignment on the contract amendments and related issues but has not yet been able to arrange this meeting.

5. In order to provide the Company adequate time to work through details and prepare considered and appropriate filings replying to Staff's Comments and complying with the Commission's directive, Idaho Power respectfully requests that the Commission issue an order extending the deadline for the Company to file its reply comments to March 31, 2023.¹

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 17th day of March 2023.



MEGAN GOICOECHEA ALLEN
Attorney for Idaho Power Company

¹ Idaho Power will also be making a filing in Case No. IPC-E-22-28, seeking an extension to make its compliance filing in case until March 31, 2023.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of March 2023, I served a true and correct copy of the foregoing Idaho Power Company’s Motion for Extension of Time to File Reply Comments upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff	<input type="checkbox"/> Hand Delivered
Riley Newton	<input type="checkbox"/> U.S. Mail
Deputy Attorney General	<input type="checkbox"/> Overnight Mail
Idaho Public Utilities Commission	<input type="checkbox"/> FAX
11331 W. Chinden Blvd., Bldg No. 8,	<input checked="" type="checkbox"/> Email – riley.newton@puc.idaho.gov
Suite 201-A (83714)	
PO Box 83720	
Boise, ID 83720-0074	

Alan W. Hansten, General Manager	<input type="checkbox"/> Hand Delivered
North Side Energy Company	<input type="checkbox"/> U.S. Mail
921 N. Lincoln Ave.	<input type="checkbox"/> Overnight Mail
Jerome, ID 83338	<input type="checkbox"/> FAX
	<input checked="" type="checkbox"/> Email – awh@northsidecanal.com



Christy Davenport
Legal Administrative Assistant