



RECEIVED

2021 NOV 17 PM 3:25

IDAHO PUBLIC
UTILITIES COMMISSION

Salt Lake City, Utah 84116

November 17, 2021

VIA ELECTRONIC DELIVERY

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
1131 W. Chinden Blvd
Building 8 Suite 201A
Boise, ID 83714

**Re: CASE NO. PAC-E-20-18
IN THE MATTER OF THE APPLICATION FOR APPROVAL OR REJECTION
OF THE AMENDED POWER PURCHASE AGREEMENT BETWEEN
PACIFICORP AND AMY FAMILY HOLDINGS, LLC**

Dear Ms. Noriyuki:

Please find for filing Rocky Mountain Power's errata pages 1, 2, and 4 in the above-referenced matter.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

A handwritten signature in blue ink that reads "Joelle Steward".

Joelle R. Steward
Vice-President of Regulation

Enclosures

Emily L. Wegener (ISB #11614)
Rocky Mountain Power
1407 West North Temple, Rm 320
Salt Lake City, Utah 84116
Telephone: (801) 220-4526
Email: emily.wegener@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION
IN THE MATTER OF THE APPLICATION) CASE NO. PAC-E-20-18
FOR APPROVAL OR REJECTION OF THE)
AMENDED POWER PURCHASE) APPLICATION OF
AGREEMENT BETWEEN PACIFICORP) ROCKY MOUNTAIN POWER
AND AMY FAMILY HOLDINGS, LLC)

Pursuant to the Rules of Procedure of the Idaho Public Utilities Commission, Rule 52, and the applicable provisions of the Public Utility Regulatory Policies Act of 1978 (“PURPA”), 16 U.S.C. § Rocky Mountain Power, a division of PacificCorp, (“Company”) respectfully requests that the Idaho Public Utilities Commission (“Commission”) issue an order approving or rejecting the amendment to extend for one year the Power Purchase Agreement (“PPA”) between PacificCorp and Amy Family Holdings, LLC qualified facility, (“Seller”) dated November 18, 2020. In support of this Application, Rocky Mountain Power states as follows:

I. INTRODUCTION

1. Rocky Mountain Power provides electric service to retail customers in the states of Idaho, Wyoming, and Utah. Rocky Mountain Power is a public utility in the state of Idaho and is subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers pursuant to Idaho Code 61-129. Rocky Mountain Power provides retail electric service to approximately 84,000 customers in the state of Idaho.

2. Seller owns, operates, and maintains a small hydro-electric power plant (the “Facility”) located in Butte County, Idaho with a nameplate capacity rating of 650 kilowatts

("kW"). Seller operates the Facility as a Qualifying Facility ("QF") under the applicable provisions of PURPA, with a contract capacity of 600 kW.

3. Sections 201 and 210 of PURPA, and pertinent regulations of the Federal Energy Regulatory Commission ("FERC") require that regulated electric utilities purchase electricity produced by co-generators or small power producers that obtain QF status. The rate a QF receives for the sale of its electricity is generally referred to as the avoided cost and must reflect the incremental cost to an electric utility of electric energy or capacity or both, which, but for the purchase from the QF, such utility would generate itself or purchase from another source.

4. The Commission has authority under PURPA, Sections 201 and 210 and FERC regulations, 18 C.F.R. 292, to set avoided costs, order electric utilities to enter into fixed-term obligations for the purchase of electricity from QFs and implement FERC rules.

5. On December 18, 2012, the Commission issued Order No. 32697,¹ which established parameters for published and negotiated avoided cost rate calculations. The Commission further established and defined numerous contract terms and conditions for standard PPAs entered into between regulated utilities and QFs.

6. On January 2, 2013, the Commission issued an Errata to Order No. 32697, which corrected published avoided cost rates to include energy payments not discounted by transmission and line loss. Subsequently the Commission issued reconsideration Orders Nos. 32737 and 32802 on February 5, 2013 and May 5, 2013, respectively, which further clarified certain terms and conditions of PPAs.

¹ *In the Matter of the Commission's Review of PURPA QF Contract Provisions Including the Surrogate Avoided Resource (SAR) and Integrated Resource Planning (IRP) Methodologies for Calculating Avoided Cost Rates*, Case No. GNR-E-11-03.

the existing PURPA contract, with updated pricing for energy sales during the extended term. The extension of the term is from January 1, 2022, through December 31, 2022, and total contract capacity of the facility remains unchanged at 600 kW.

12. The Seller has demonstrated to the Company's reasonable satisfaction that: (1) the Facility's net energy will equal the energy delivery schedules for the extended term of this Amendment; and (2) the likelihood that the Facility, under average design conditions, will generate at no more than 2.5 aMW in any calendar month. The Facility's estimated net output over the extended term is 1,904 megawatt-hours.

13. The Amendment submitted herewith, as Attachment 1, complies with the Commission's previous orders, and except as otherwise indicated, the Company will pay the Seller the price set forth in Exhibit A to the Amendment.

14. Paragraph 5 of the Amendment provides that the contract will not become effective until the Commission has approved it and determined that the prices paid for energy and capacity are just and reasonable, in the public interest, and that costs incurred by the Company for purchasing energy and capacity are legitimate expenses, all of which the Commission will allow the Company to recover in Idaho rates in the event other jurisdictions deny recovery of their proportionate share of said expenses.

III. COMMUNICATIONS

15. Communications regarding this filing should be addressed to:

Ted Weston
Idaho Regulatory Affairs Manager
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, Utah 84116
Telephone: (801) 220-2963
Email: ted.weston@pacificorp.com
IdahoDockets@pacificorp.com