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IDAHO PUBLIC
UTILITIES COMMISSION

1407 W. North Temple, Suite 330
Salt Lake City, Utah 84116

March 10, 2021

VIA ELECTRONIC DELIVERY

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 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 Motion for Stay 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

Emily L. Wegener, (pro hac vice)
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) ROCKY MOUNTAIN POWER
AGREEMENT BETWEEN PACIFICORP) UNOPPOSED MOTION FOR STAY
AND AMY FAMILY HOLDINGS, LLC)**

Comes now Rocky Mountain Power, a division of PacifiCorp, (“Company”) pursuant to RP 324 – Stay of Order, respectfully files this unopposed Motion for Stay with the Idaho Public Utilities Commission (“Commission”). In support of this Application, Rocky Mountain Power states as follows:

I. BACKGROUND

1. On December 3, 2020, the Company filed this application (“Application”) with the Commission requesting a one-year extension to the Amy Family Holdings, LLC qualified facility contract (“Seller”). Seller owns, operates, and maintains a small hydro-electric power plant (the “Facility”) located in Butte County, Idaho with a nameplate capacity rating of 450 kilowatts (“kW”). Seller operates the Facility as a Qualifying Facility (“QF”) under the applicable provisions of PURPA.

2. The Seller’s current PURPA contract entered into on January 3, 1985, is scheduled to expire on December 31, 2021. The PURPA contract was entered into prior to PacifiCorp separating its energy supply and transmission functions as required by federal law and regulations.

3. Therefore, the contract includes provisions that address both energy sales and interconnection requirements. The Seller has expressed a desire to continue to make sales from the Facility to PacifiCorp consistent with the requirements of PURPA as implemented in the State of Idaho.

4. The Seller and PacifiCorp are in the process of securing a new stand-alone interconnection agreement that, after all distribution system upgrades are constructed and in-service, will replace the interconnection provisions in the current PURPA contract.

5. The Application requested a one-year extension to the contract to provide the Seller enough time to complete the required interconnection agreement before a new QF contract can be completed. Since filing the Application, the Seller has made significant progress on the new interconnection provisions to the point the Company is reasonably certain the Seller should be able to complete the interconnection requirements before the current contract expires.

6. Based on the Seller's progress to acquire an interconnection agreement and discussions with Commission Staff the Company respectfully files this Motion for Stay with the Commission subject to the Seller acquiring an interconnection agreement by October 15, 2021.

II. COMMUNICATIONS

7. 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

Emily Wegener (pro hac vice)
Senior Counsel
Rocky Mountain Power
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Salt Lake City, Utah 84116
Telephone: (801) 220-4526
Email: emily.wegener@pacificorp.com

In addition, Rocky Mountain Power requests that all data requests regarding this Application be sent in Microsoft Word to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 Multnomah, Suite 2000
Portland, Oregon 97232

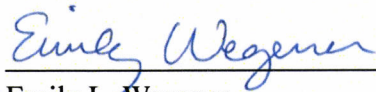
Informal questions may be directed to Ted Weston, Idaho Regulatory Affairs Manager at (801) 220-2963.

III. REQUEST FOR STAY

WHEREFORE, Rocky Mountain Power respectfully files the unopposed motion for Stay in the above referenced proceeding with the Idaho Public Utilities Commission.

DATED this 10th day of March, 2021.

Respectfully submitted,
ROCKY MOUNTAIN POWER



Emily L. Wegener

Attorney for Rocky Mountain Power