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LAW OFFICES, PLLC

John L. Runft | Jon M. Steele

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IDAHO PUBLIC
UTILITIES COMMISSION

February 1, 2012

Idaho Public Utilities Commissioners
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Via Hand Delivery

Re: *Case No. IPC-E-11-25*
IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY
FOR A DETERMINATION REGARDING THE FIRM ENERGY SALES
AGREEMENT FOR THE SALE AND PURCHASE OF ELECTRIC ENERGY
BETWEEN IDAHO POWER COMPANY AND DYNAMIS ENERGY, LLC

Dear Commissioners:

On behalf of Mr. Hubert Osborne, an Idaho Power customer, I submit the following objections and comments concerning Case No. IPC-E-11-25:

1. There has been no waste-to-energy plants built in the United States for the last 15 years. *See p. 83 attached.*
2. Idaho has no renewable energy standards and no energy plan. *See pp. 85-89 attached.*
3. In this vacuum of leadership Idaho's cities, counties, and urban renewal districts have rushed to fill that void. *See pp. 3-79 attached.*
4. Our local governments have spent millions of dollars researching the feasibility of technology that Dynamis Energy LLC labels "experimental." *See pp. 17, 59, 63, 65, 68-69, and 70 attached.*

r u n f t s t e e l e . c o m

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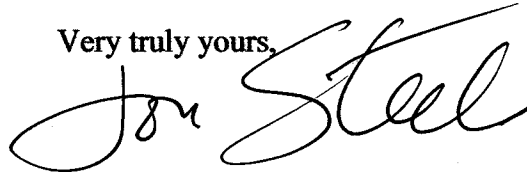
5. In June of 2010 Ada County agreed to pay Dynamis almost two million dollars for the design of a trash-to-energy Project labeled as “experimental.” *See* pp. 17 and 23; *see also*, p. 42 (referring to Ada County’s purchase of the design and the sale of the design back to Dynamis.)
6. The Eastern Idaho Regional Solid Waste District, which includes Clark, Bonneville, Madison and Fremont counties, retained Precision Systems Engineering to analyze the Dynamis Energy 3.0 thermal oxidation system technology. This report concluded “[t]here are many factors in the operation of a plant this complex that cannot be foreseen. For this reason, PSE believes the EIRSWD will be exposed to some risk.” In summary the report concluded that: “Subject to these areas of uncertainty and further subject to the detail of the information provided to PSE by Dynamis, PSE believes that the Dynamis technology is feasible and has a reasonable likelihood of being operable. *See*, EIRSWD Waste to Energy Project, meeting of March 3, 2011, PSE Independent Analysis Findings (available online).
7. On October 17, 2011, Nampa City and the Nampa Development Corporation, after commissioning a \$250,000 study (*see* pp. 61-70) were advised by McKinstry that the Dynamis proposal was not cost-effective under the recently revised PURPA power purchasing rates as set by the Idaho PUC. *See* p. 70 attached.
8. FERC’s implementing regulations allow this Commission, in setting rates for purchases, to differentiate among various technologies on the basis of the supply characteristics of such technologies (18 C.F.R. § 292.304(c)(3)(ii)) and to consider “[t]he expected or demonstrated reliability of the qualifying facility.” (18 C.F.R. § 292-304(e)(2)(ii))
9. It is virtually impossible for this Commission to determine the reliability of the Dynamis technology, the economic viability or the feasibility of this application based upon the record before the Commission.
10. According to Dynamis the technology for this project is a patented process and a trade secret. *See*, pp. 22 and 58.
11. The application contains only a general description of the Dynamis technology and Idaho Power specifically disclaims responsibility for the Dynamis technology.
12. The application commits Dynamis to deliver up to 20MW of non-intermittent energy during heavy load hours. Yet, the Dynamis contract with Ada County addresses interruptions or shortfalls of waste delivery. *See* pp. 44-46.

13. In determining the avoided cost of this application, the Commission must also consider the falling prices of natural gas. *See pp. 80-81 attached.*
14. The Commission must also consider the cumulative renewable power generation previously approved. Idaho Power could have 1,100 MW of wind-powered generation on its system in the near term that would exceed the minimum loads experienced on Idaho Power's system this year.
"Cumulatively, this amount of generation would exceed any other single source of generation – hydro, coal, natural gas, or renewables – that exists on Idaho Power's system. *See p. 2 attached.*
15. A waste-to-energy facility has three potential sources of revenue.
 - a. Energy sales
 - b. Credit and renewable energy credits *See pp. 31, 39 and 50.*
 - c. Tipping fees *See p. 90.*
16. Ada County will not charge Dynamis a tipping fee. *See pp. 44 and 46.* But Dynamis may charge a tipping fee to third parties (p. 46) and may request fees after the initial term of the Ada County contract. *See p. 48.*
17. The Commission will soon be entertaining additional Dynamis applications. Now is the time for the Commission to scrutinize the technology and the real avoided cost of this application.
18. As a negotiated price, and not a posted rate, the rate to be paid Dynamis is subject to objection that it is too high.
19. The Dynamis avoided cost of \$92.36 per MWH far exceeds other renewable energy rates. *See p. 91*
20. The Dynamis application will saddle Idaho Power customers with additional costs and higher power rates.
21. The Commission has the responsibility to set cost rates that are just and reasonable to Idaho Power ratepayers, not Dynamis.
22. This application presents the Commission with policy and feasibility questions that require a technical hearing.
23. The modified procedure requested by Idaho Power does not serve the public interest.

Idaho energy policies should be addressed by our state legislators, our IPUC Commissioners, and technical and financial experts. This application is driven by locally elected officials with little or no knowledge in this specialized area who can be easily influenced and who are forcing Idaho energy policy into a black hole.

Mr. Osborne, on behalf of himself and other Idaho Power ratepayers, pray that the Commission schedule a technical hearing so that the Commission can take testimony and evidence concerning this application.

Very truly yours,

A handwritten signature in black ink that reads "Jon Steele". The signature is written in a cursive style with a large, sweeping "S" for the last name.

Jon M. Steele
Runft & Steele Law Offices, PLLC

JMS:kra
Enclosures

Sources

1. Attorney Steele letter to Idaho Public Utilities Commission dated December 15, 2011 pp. 1-2
2. Attorney Steele Press Release: *Backdoor Politics: The Ada County Commissioners and Dynamis Energy, LLC* pp. 3-5
3. Attorney Steele Press Release: *Backdoor Politics: The Ada County Commissioners and Dynamis Energy, LLC, Chapter 2* pp. 6-7
4. Contract for Professional Consulting Services Between Ada County and Dynamis Energy, LLC Where the Fee is Actual Cost with A Guaranteed Maximum Price pp. 8-34
5. Franchise Agreement Between Ada County and Dynamis Energy, LLC pp. 35-57
6. Dynamis Energy 3.0 State of the Art Technology copyright 2010 Dynamis Energy, LLC p. 58
7. Cynthia Sewell, *Two plants in Idaho could turn 250 tons of trash a day into power for 10,000 homes*, Idaho Statesman, February 15, 2011 p. 59
8. Cynthia Sewell, *Eagle company to build waste-to-energy plant in Italy*, Idaho Statesman, June 9, 2011 p. 60
9. Minutes from Special Meeting of the Nampa Development Corporation, Wednesday April 13, 2011 p. 61
10. Minutes from Special Council meeting, May 10, 2011 pp. 62-64
11. Minutes from the Meeting of the Nampa Development Corporation, Wednesday, October 12, 2011 pp. 65-67
12. *Nampa wise to look into waste power plant idea (take poll at right)*, Idaho Press Tribune, May 12, 2011, [http://www.idahopress.com/opinion/editorial/nampa wise to look...](http://www.idahopress.com/opinion/editorial/nampa_wise_to_look...) pp. 68-69

13. Letter from McKinstry to Nampa City Mayor, Tom Dale, dated October 17, 2011 p. 70
14. Jeremy Fugleberg, *Companies plan garbage-fueled power plants in Wyoming*, Star Tribune, May 18, 2011. pp. 71-73
15. *Dynamis Energy and Planova Sign Agreement to Construct Waste-to-Energy Plants in Brazil*, Brazil Business Today, October 11, 2011, [http://brazilbusiness.einnews.com/pr_news/61266432/dynamis energy and planova...](http://brazilbusiness.einnews.com/pr_news/61266432/dynamis_energy_and_planova...) pp. 74-75
16. Jeremy Fugleberg, *Wyoming garbage-fueled power plants move forward*, Star-Tribune, November 27, 2011 pp. 76-77
17. Sven Berg, *Projects Spark Discussion on Waste-To Energy Technology*, Idaho Falls Post Register, January 15, 2012 pp. 78-79
18. Julie Johnsson and Mark Chediak, *Electricity Declines 50% as Shale Spurs Natural Gas Glut: Energy*, Businessweek, January 19, 2012, [http://www.businessweek.com/new/2012-01-19/electricity-declines-50-as](http://www.businessweek.com/new/2012-01-19/electricity-declines-50-as.....) pp. 80-81
19. Spokane Waste to Energy Facility, <http://spokane.wastetoenergy.com/WastetoEnergy.htm> pp. 82-84
20. Comments of Idaho Power Company to the Interim Committee on Energy, Environment and Technology on the Draft 2012 Idaho Energy Plan pp. 85-89
21. Tipping fee chart p. 90
22. Comparison of Renewable Energy Rates p. 91



RUNFT & STEELE
LAW OFFICES, PLLC

John L. Runft | Jon M. Steele

December 15, 2011

Mr. Gene Fadness
Executive Assistant
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Mr. Rick Sterling
Staff Engineer
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

VIA HAND DELIVERY

Re: *Case No. IPC-E-11-25*
**IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY
FOR A DETERMINATION REGARDING THE FIRM ENERGY SALES
AGREEMENT FOR THE SALE AND PURCHASE OF ELECTRIC ENERGY
BETWEEN IDAHO POWER COMPANY AND DYNAMIS ENERGY, LLC**

Dear Mr. Fadness and Mr. Sterling:

I represent Mr. Hubert Osborne, an Idaho Power customer and resident of Canyon County. Mr. Osborne and a number of other Idaho Power customers have concerns about the above-referenced application.

Although PURPA was intended to encourage the development of renewable energy technologies as alternatives to the use of fossil fuels, this application is premised upon unproven technology, government payments, and tax credits. The unique characteristics of this application differentiate it from PURPA qualifying facilities.

The modified procedure requested by Idaho Power does not serve the public interest. Not only is the proposed technology unproven but the framework of the entire business model is premised upon contracts with other public entities which do not have the ability to question the representations of Dynamis Energy, LLC.

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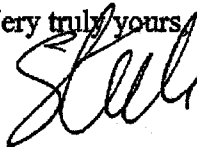
The application states the contract price will be a negotiated price between the utility and developer. Without knowing the rate the Commission has no basis for determining it to be reasonable. Additionally, this application is intended to formulate a model to be repeated in other Idaho counties.

The public deserves to be heard on the energy policy issues presented by this application as the issues involved in this application will affect the future of alternative energy resources in our state. The Commission should require complete transparency and disclosure of all conflicts of interest.

Please place the following individuals on the Interested Parties list:

1. Jon M. Steele jsteele@runftsteele.com
2. Hubert Osborne hlclosborne@aol.com

Idaho Power's request that this application be handled by modified procedure must be denied and a hearing date scheduled.

Very truly yours,


Jon M. Steele
Runft & Steele Law Offices, PLLC

JMS:kra

Cc: Hubert Osborne

PRESS RELEASE

Backdoor Politics: The Ada County Commissioners and Dynamis Energy, LLC

Why would Idaho Power agree to pay Dynamis Energy far more than any other alternative energy provider?

The Idaho Public Utilities Commission has been asked to approve a "deal" between Dynamis Energy, LLC and Idaho Power Company that will require Idaho Power to pay Dynamis more than twice the going rate for electricity. The Dynamis electricity is planned to be generated at a proposed trash-to-energy Project located at the Ada County landfill.

While the public spotlight is now focused upon Idaho Power and the Idaho Public Utilities Commissioners, this boondoggle originated with the Ada County Commissioners.

Although Idaho Power has made the application to the Idaho Public Utilities Commission for approval of the Dynamis "deal," a close reading of the Idaho Power papers discloses a less than enthusiastic endorsement. The garbage to energy concept sounds green and clean and may even be technically feasible, but it will be expensive for Idahoans, who have enjoyed the cheapest electric rates in the United States.

In June of 2010 the Ada County Commissioners agreed to pay Dynamis almost 2 million dollars for the design of a trash-to-energy Project to be built at the Ada County landfill. The primary benefit to Ada County is the possibility of extending the useful life of the landfill because the Project will incinerate garbage rather than bury it.

However, unlike many communities, Ada County has a landfill that will provide solid waste disposal for roughly 70 to 100 years – the Hidden Hollow Landfill off of Hill Road. In 2007 Ada County opened a new landfill section, the North Ravine Cell, located on 2700 acres of County-owned property. The North Ravine Cell is the replacement landfill for the nearly full Hidden Hollow Landfill.

In 2005, Ada County contracted with Fortistar Energy to burn the natural byproduct at the Hidden Hollow Landfill - gas - which is used as fuel to generate electricity. Fortistar can generate roughly 3.2 mega-watts of electricity – enough to power about 2,400 homes. In 2010 Fortistar paid Ada County \$260,786 for gas produced by rotting garbage which was converted to electricity and sold to Idaho Power. Yet, the rate paid to Fortistar by Idaho Power is substantially lower than the rate to be paid Dynamis.

Dynamis, according to its website, is composed of "...a group of highly committed professionals that are dedicated to clean renewable energy through waste recovery systems." If their website is to be believed, Dynamis is "...your best source for value-driven, environmentally sound, global turnkey waste to energy services." Dynamis owns "...state-of-the-art proprietary waste-to-energy technology." Their "...patented process reduces reliance on fossil fuels,

decreases harmful emissions and provides numerous immeasurable long-term benefits, clearing a new path toward a sustainable and cleaner world.” Who can argue with that?

In June of 2010 Ada County Commissioners Fred Tillman, Sharon M. Ullman, and Rick Yzaguirre took it upon themselves to sign a contract with Dynamis which says that Dynamis will design “... a 250 ton per day waste to energy facility...” referred to as the Project. The Dynamis website states that ... “[o]ne of our 250 ton per day plants produces on average 15 megawatts, which means **in theory** we can provide power for 14,000 homes.” [emphasis added].

Between July 15 and December 17, 2011, Ada County paid Dynamis almost 2 million dollars. These payments were for the design of the Project. None of these payments purchased any material or labor or permits that will be required to build the Project.

The Dynamis contract does not guarantee that the waste to energy Project will work or even that the waste to energy Project will *probably* work. Rather, the contract states that the almost 2 million dollar Project design is based upon “experimental technologies” and that after review of the Project design Ada County “...may not want to proceed.”

On November 1, 2011 the Ada County Commissioners entered into a second agreement with Dynamis. This time, however, Commissioner Vern Bisterfeldt refused to go along, but majority ruled. This agreement allows Dynamis to finance the Project, build it, own it, and operate a 54,400 square foot plant costing \$60,000,000 on County land for \$1 a year. The County will deliver 408 tons of waste daily to Dynamis at no charge. Dynamis will convert the trash to electricity which it plans to sell to Idaho Power, which brings us back to the Idaho Power application before the Idaho Public Utilities Commission.

Energy law requires Idaho Power to contract with Dynamis, but not at an inflated price which will ultimately be paid by Idaho Power customers. This “deal” favors Dynamis over Idaho Power customers. While science and technology make the Dynamis project *possible*, science and technology have not made the Dynamis project *economically feasible*.

The Ada County Commissioners’ rush to contract with Dynamis left little time for any analysis. The driving forces behind the rush to contract were government payments, tax incentives about to expire, and cash.

Approval of this “deal” will open the flood gates. The Dynamis “deal” is based upon a franchise business model designed to be repeated over and over again with local governments who are lured into approval by the “clean and green” mantra and the possibility of economic growth.

Any opposition to the Idaho Power application before the Idaho Public Utilities Commission runs the risk of being labeled as anti-clean, anti-green, and anti-environment. But these are not the issues to be decided. The real issue is whether we saddle the next generation of Idahoans with obligations that are not economically feasible. The simple question is: Why would Idaho Power agree to pay Dynamis far more than any other alternative energy provider?

The Idaho Public Utilities Commission is taking comment on the Dynamis "deal" through February 2, 2012. Comments are accepted via e-mail by accessing the Commission's homepage at www.puc.idaho.gov and clicking on "Comments & Questions About a Case." Fill in the case number (IPC-E-11-25) and enter your comments. Comments can also be mailed to P.O. Box 83720, Boise, ID 83720-0074 or faxed to (208) 334-3762. Be sure to join the list of "Interested Parties."

The public's only opportunity to express views on the Dynamis "deal" is to submit comments before February 2. As of today, there will be no public hearing for you to attend. Our Public Utility Commissioners will read and respect your comments, but only if you beat the February 2 deadline.

The full text of the Commission's order in this application, along with other documents related to this case, are available on the Commission's Web site at www.puc.idaho.gov. Click on "File Room" and then on "Electric Cases" and scroll down to the above case number.

The Ada County Commissioners can be reached at (208) 287-7000.

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PRESS RELEASE

Backdoor Politics: Ada County Commissioners and Dynamis Energy, LLC Chapter 2

We are all in favor of renewable energy. We favor renewable energy so much that our lawmakers have made it a favored industry. If it's renewable a project receives favorable press, tax status, and all the benefits our lawmakers can dole out. Unfortunately, some lawmakers do not know how to identify a renewable energy project.

The theory behind renewable energy is to encourage clean energy like solar, wind, biomass, geothermal, and landfill gas generators. Typically these alternative or renewable energy projects must spend a significant amount of time and money securing and analyzing the motive force that leads to the generation of electricity before they commit to project contracts.

The Dynamis project skips the analysis phase and goes straight to the project contracts. Should the Idaho Public Utilities Commission approve this "deal" between Dynamis Energy, LLC and Idaho Power Company it would be signing off on technology that has no operational history anywhere in the world.

The garbage business has become big business. The Dynamis project, in the renewable energy arena, is huge. Dynamis projects the cost at \$60,000,000.

Idaho Power is obligated by federal energy law to offer to purchase the electricity that may be generated by the Dynamis "project," even though Idaho Power is choking on renewable energy projects. They have enough wind generation contracts in the works to exceed any other single source of generation – hydro, coal, natural gas or renewables – that exists on Idaho Powers' systems.

This boondoggle assumes the technology will work. But Dynamis has not made that promise to anyone. In fact, according to Dynamis, the technology is "experimental." Idaho Power disclaims any responsibility for the Dynamis technology.

The Dynamis "sales pitch" is that using their "experimental technology" garbage will not have to be pretreated, sorted or shredded. The problem with the sales pitch is that garbage contains "biogenic" material, such as paper, yard trimmings and food waste and "non-biogenic" material like plastics, rubber, and metals. Incinerating the biogenic materials is good. But incinerating the non-biogenic materials is bad. The non-biogenic materials are considered the same as burning fossil fuels, like coal.

Our Idaho Public Utility Commission should take another look at the Dynamis project. Other states, like Arizona, are struggling with the question of whether trash to energy is a renewable energy source.

The Dynamis sales pitch works. Ada County handed over almost 2 million dollars and signed a sweetheart deal leasing property to Dynamis for 20 years at \$1 a year.

Last week Bonneville, Madison, Clark, and Fremont Counties signed up for the same sweetheart deal for \$15,000 each. Nampa passed on the sales pitch after commissioning a \$250,000 study.

It's time to bring this boondoggle to a halt.

The Idaho Public Utilities Commission is taking comment on the Dynamis "deal" through February 2, 2012. Comments are accepted via e-mail by accessing the Commission's homepage at www.puc.idaho.gov and clicking on "Comments & Questions About a Case." Fill in the case number (IPC-E-11-25) and enter your comments. Comments can also be mailed to P.O. Box 83720, Boise, ID 83720-0074 or faxed to (208) 334-3762.

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The Ada County Commissioners can be reached at (208) 287-7000. Commissioner Vern Bisterfeldt has opposed the Dynamis deal.

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AGREEMENT NO. 8952

**CONTRACT
FOR PROFESSIONAL CONSULTING
SERVICES BETWEEN ADA COUNTY
AND DYNAMIS ENERGY, LLC
WHERE THE FEE IS ACTUAL COST
WITH A GUARANTEED MAXIMUM
PRICE**

ADA COUNTY WASTE TO ENERGY PROJECT

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AGREEMENT NO. _____

**CONTRACT FOR PROFESSIONAL SERVICES
BETWEEN OWNER AND DYNAMIS ENERGY, LLC**

THIS CONTRACT FOR PROFESSIONAL SERVICES BETWEEN OWNER AND CONSULTANT (the "Contract") is made and entered into by Ada County, a duly formed and existing county pursuant to the laws and Constitution of the State of Idaho, (the "Owner") and Dynamis Energy, LLC, an Idaho Limited Liability Company (the "Consultant").

The professional services required by this Contract are to be rendered for a design of a 250 ton per day waste to energy facility at the Hidden Hollow Sanitary Landfill (the "Project").

NOW, THEREFORE, in consideration of the mutual promises, covenants, and agreements stated herein, and for other good and valuable consideration, the sufficiency of which is hereby acknowledged, the Owner and the Consultant agree:

ARTICLE I.

REPRESENTATIONS AND WARRANTIES

By executing this Contract, the Consultant makes the following express representations and warranties to the Owner:

- A. The Consultant will be professionally qualified to act in whatever capacity required for the Project and licensed to practice in that capacity by all public entities having jurisdiction over the Consultant and the Project;
- B. The Consultant shall maintain all necessary licenses, permits, or other authorizations necessary to act as Consultant for the Project until the Consultant's duties hereunder have been fully satisfied;
- C. The Consultant has become familiar with and examined the Project site, facilities, existing structures, and the local conditions under which the Project is to be designed, constructed, and operated;
- D. The Consultant shall prepare all documents and items required by this Contract including, but not limited to, designs, advice, reports, needs assessments, and all

contract plans and specifications. Such documents and items shall be accurate, coordinated, adequate for construction, sufficient to accomplish the purposes of the Project, and shall be in conformity and comply with all applicable laws, codes, and regulations.

E. The Consultant assumes full responsibility to the Owner for the improper acts and/or omissions (excluding intentional acts) of its consultants or others employed or retained by the Consultant in connection with the Project, but not for acts and omissions expressly directed by the Owner; and

F. Consultant shall promptly notify Owner of any material changes in Consultant's duties for the Project.

ARTICLE II.

**PRELIMINARY CONSULTATION, EXAMINATION,
AND REPORT OF OWNER'S CRITERIA**

Owner shall name a liaison for the Project. Prior to the preparation of the Preliminary Design as required by Article III below, the Consultant shall first consult in detail with the Owner and shall carefully examine any information provided by the Owner concerning the Owner's purposes, concepts, desires, existing facilities, and requirements (the "Owner's Criteria"), including, but not limited to, the Preliminary Owner's Criteria attached hereto as Exhibit "B" and any design, construction, scheduling, budgetary, or operational Project needs, restrictions, or requirements. Following such examination, the Consultant shall prepare and submit to the Owner a written report detailing the Consultant's understanding of the Owner's Criteria and identifying any design, construction, scheduling, budgetary, operational, or other problems or recommendations which may result from the Owner's Criteria. The report shall contain a preliminary Master Schedule containing both a design and construction schedule. The written report of the Consultant shall also include proposed solutions, if appropriate, addressing each of such identified problems.

Owner shall review the report with the Consultant in a timely manner.

ARTICLE III.

PRELIMINARY DESIGN

After reviewing with the Owner the written report required by Article II above, agreeing upon any proposed solutions to identified problems resulting from the Owner's Criteria, and in accordance with Article IX hereof, the Consultant shall draft and submit to the Owner a Preliminary Design for the Project. The Preliminary Design shall be consistent with the Owner's Criteria, as, and if, modified and shall include all of the following tasks which apply:

A. Preliminary plans that depict, as appropriate, each of the basic aspects of the Project including, but not necessarily limited to, the size, location, and dimensions of each structure, machine, and component;

B. Preliminary plans which depict each exterior view of each structure, machine, and component;

C. A floor plan for each pad and covered structure within the Project and the dimensions thereof;

D. Written preliminary specifications, together with preliminary plans, if and as necessary or useful to the Owner, of the architectural, electrical, mechanical, geotechnical, hydrological, structural, engineering and, if relevant, other systems to be incorporated in the Project;

E. A site analysis of contributing county waste streams and environmental conditions, as required to complete paragraphs G and H of this Article and Consultant's tasks described in Article IV;

F. Identify external utilities, permits, and licenses necessary for plant construction, as required to complete paragraphs G and H of this Article and Consultant's tasks described in Article IV below;

G. Develop and submit the Preliminary Engineering Plan (PER) for the Project to State of Idaho Department of Environmental Quality;

H. Development and submittal of Air Quality Models associated with the Project to State of Idaho Department of Environmental Quality;

