

KRISTINE A. SASSER  
DEPUTY ATTORNEY GENERAL  
IDAHO PUBLIC UTILITIES COMMISSION  
PO BOX 83720  
BOISE, IDAHO 83720-0074  
(208) 334-0357  
BAR NO. 6618

RECEIVED  
2014 JUL 24 PM 2:10  
IDAHO PUBLIC  
UTILITIES COMMISSION

Street Address for Express Mail:  
472 W. WASHINGTON  
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION OF )  
IDAHO POWER COMPANY FOR APPROVAL ) CASE NO. IPC-E-14-12  
OR REJECTION OF AN ENERGY SALES )  
AGREEMENT WITH EIGHTMILE HYDRO ) COMMENTS OF THE  
CORPORATION FOR THE SALE AND ) COMMISSION STAFF  
PURCHASE OF ELECTRIC ENERGY FROM )  
THE EIGHTMILE HYDRO PROJECT. )**

**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 33063 on June 26, 2014, in Case No. IPC-E-14-12, submits the following comments.

**BACKGROUND**

On May 27, 2014, Idaho Power Company filed an Application requesting that the Commission accept or reject an Agreement between Idaho Power and Eightmile Hydro Corporation (Eightmile Hydro), for the sale and purchase of electric energy generated by the Eightmile Hydro Project. On May 5, 2014, Idaho Power and Eightmile Hydro entered into an Agreement pursuant to the terms and conditions of various Commission Orders applicable to PURPA agreements for non-seasonal hydro projects. Idaho Power states that Eightmile Hydro proposes to operate and maintain a 360 kilowatt (kW) non-seasonal hydro energy facility to be