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**DONOVAN E. WALKER**  
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July 1, 2014

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. IPC-E-14-18  
Solar Integration Rates and Charges – Idaho Power Company's Application  
and Testimony

Dear Ms. Jewell:

Enclosed for filing in the above matter please find an original and seven (7) copies of Idaho Power Company's Application.

Also enclosed for filing are nine (9) copies each of the Direct Testimony of Philip B. DeVol and Michael J. Youngblood. One copy of each of the aforementioned testimonies has been designated as the "Reporter's Copy." In addition, a disk containing Word versions of Mr. DeVol's and Mr. Youngblood's testimonies is enclosed for the Reporter.

If you have any questions about the enclosed documents, please do not hesitate to contact me.

Very truly yours,

Donovan E. Walker

DEW:csb  
Enclosures

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Attorney for Idaho Power Company

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION )  
OF IDAHO POWER COMPANY TO ) CASE NO. IPC-E-14-18  
IMPLEMENT SOLAR INTEGRATION )  
RATES AND CHARGES. ) APPLICATION  
\_\_\_\_\_ )

In accordance with RP 052, Idaho Power Company (“Idaho Power” or “Company”) hereby respectfully requests the Idaho Public Utilities Commission (“Commission”) authorize Idaho Power to implement solar integration rates and charges consistent with its 2014 solar integration study (“Study” or “Solar Study”).

In support of this Application, Idaho Power represents as follows:

**I. INTRODUCTION**

1. Due to the variable and intermittent nature of solar generation, Idaho Power must modify its system operations to successfully integrate solar power without impacting system reliability, similar to wind generation. Idaho Power, or any electrical system operator, must provide operating reserves from resources that are capable of