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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE APPLICATION )  
OF PACIFICORP DBA ROCKY MOUNTAIN ) CASE NO. PAC-E-13-12  
POWER FOR APPROVAL OF ITS )  
CAPACITY DEFICIENCY PERIOD TO BE )  
UTILIZED IN THE COMPANY'S SAR ) COMMENTS OF THE  
METHODOLOGY. ) COMMISSION STAFF  
\_\_\_\_\_ )**

**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, to submit the following comments in response to the Notice of Modified Procedure issued on January 24, 2014, Order No. 32970.

**BACKGROUND**

In Order No. 32697, the Commission directed that a case be initiated outside of each utility's Integrated Resource Plan (IRP) filing to establish a capacity deficiency period to be utilized in the utility's Surrogate Avoided Resource (SAR) methodology for computing avoided cost rates to be included in PURPA power purchase agreements. On October 15, 2013, PacifiCorp dba Rocky Mountain Power (Rocky Mountain Power) filed an Application requesting that the Commission approve its updated capacity deficiency periods to be utilized in its SAR avoided cost methodology.