

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER SMITH  
COMMISSIONER REDFORD  
COMMISSION SECRETARY  
COMMISSION STAFF  
LEGAL

**FROM:** SCOTT WOODBURY

**DATE:** JUNE 21, 2007

**SUBJECT:** CASE NO. PAC-E-07-07 (PacifiCorp)  
PETITION REGARDING PURPA WIND QFS: TO REVISE PUBLISHED  
AVOIDED COST RATES; TO ELIMINATE 90%/110% PERFORMANCE  
BAND; AND TO AMEND PUBLISHED RATE ELIGIBILITY RULES –  
(DISAGGREGATION)

CASE NO. AVU-E-07-02 (Avista)  
PETITION REGARDING PURPA WIND QFS: TO REVISE PUBLISHED  
AVOIDED COST RATES; TO ELIMINATE 90%/110% PERFORMANCE  
BAND; AND TO AMEND PUBLISHED RATE ELIGIBILITY RULES –  
(DISAGGREGATION)

A common issue in each case is “disaggregation,” a utility proposal to prevent QFs from disaggregating large QF wind projects into smaller projects to qualify for published avoided cost rates available to QFs smaller than 10 MW.

Staff (with utility acquiescence) proposes to process the disaggregation issue pursuant to Modified Procedure; i.e., by written submission rather than by hearing. IDAPA 31.01.01.201-204.

### COMMISSION DECISION

Staff recommends that the “disaggregation” issue in the above cases be processed pursuant to Modified Procedure. Does the Commission agree with the recommended procedure?

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Scott Woodbury