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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
AVISTA CORPORATION FOR APPROVAL OF) CASE NO. AVU-E-14-08
AN ELECTRIC DISTRIBUTION SERVICE)
AGREEMENT WITH EAST GREENACRES) COMMENTS OF THE
IRRIGATION DISTRICT.) COMMISSION STAFF
_____)**

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Daphne Huang, Deputy Attorney General, and in response to the Notice of Modified Procedure issued in Order No. 33106, submits the following comments.

BACKGROUND

On August 14, 2014, Avista Corporation ("Avista" or "Company") filed an Application with the Commission seeking approval of its Electric Distribution Service Agreement ("Agreement") with East Greenacres Irrigation District ("East Greenacres"). Greenacres operates and maintains two Bureau of Reclamation-built pumping facilities on the Rathdrum Prairie, providing irrigation and domestic water supply to approximately 5,300 acres of land. Application at 2. To operate the pumping facilities, Greenacres receives electric power from the Bureau of Reclamation which is delivered through Avista's transmission and distribution facilities. *Id.* at 2-3. Greenacres and Avista have entered into a second Agreement for transfer of Bureau of Reclamation energy over Avista's distribution facilities. *Id.* at 3. The Agreement