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November 9, 2006

IDAHO PUBLIC
UTILITIES COMMISSION

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

Attention: Jean D. Jewell
Commission Secretary

Re: Reply Comments of PacifiCorp in Case No. GNR-E-06-2

PacifiCorp (d.b.a. Rocky Mountain Power) hereby submits for filing an original and seven (7) copies of its Reply Comments in Case No. GNR-E-06-2 In The Matter of the Commission's Consideration of the Five Amendments to Section 111 of the Public Utility Regulatory Policies Act of 1978 (PURPA) Contained in the Energy Policy Act of 2005.

Service of pleadings, exhibits, orders and other documents relating to this proceeding should be served on the following:

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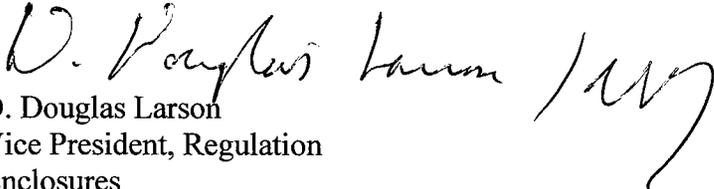
It is respectfully requested that all formal correspondence and Staff requests regarding this material be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

By fax: (503) 813-6060

Sincerely,


D. Douglas Larson
Vice President, Regulation
Enclosures

cc: Service List in Case No. GNR-E-06-2

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Attorney for PacifiCorp

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S)	CASE NO. GNR-E-06-2
CONSIDERATION OF THE FIVE)	
AMENDMENTS TO SECTION 111 OF THE)	REPLY COMMENTS OF
PUBLIC UTILITY REGULATORY POLICIES)	PACIFICORP
ACT OF 1978 (PURPA) CONTAINED IN THE)	
ENERGY POLICY ACT OF 2005)	
_____)	

COMES NOW PacifiCorp dba Rocky Mountain Power (“PacifiCorp” or the “Company”), by and through its attorney of record, and respectfully submits the following reply comments in the above referenced matter.

REPLY COMMENTS

The Company generally agrees with Staff’s comments and recommendation “that the Commission find that the utilities’ prior submittals, tariffs, prior Orders and this decision have satisfied all requirements of the [Energy Policy Act of 2005] for current action by the utilities.” Regarding the standards of Net Metering, Diversity of Fuel Sources, and Fossil Fuel Generation Efficiency, the Company agrees that no further action is required to satisfy the Act, and does not object to Staff’s recommendation that

future Integrated Resource Plans explicitly address the issue of generation efficiency as part of the planning process. With regards to Smart Metering, the Company appreciates Staff's view that implementation of such programs should be pro-active, but also measured, cost-effective, and utility-specific. The Company does not object to Staff's recommendation that the "status of the Company's time of use programs" and "plans to changes or upgrades for advanced metering" should be addressed by Rocky Mountain Power in the context of its next general rate case, in conjunction with a proceeding to address the cost recovery of any advanced metering programs.

For Interconnection, the Company agrees that the spirit and intent of the standard is met by incorporating IEEE 1547, but is unclear how it would implement Staff's recommendation that the NARUC Model Agreement ("NARUC Model") be used as a "guideline" for interconnection agreements. PacifiCorp seeks clarification as to the meaning of "guideline" as the Commission considers adopting Staff's recommendation on the use of the NARUC Model in the interconnection process and agreements with distributed generation developers. While not a comprehensive list, the following are examples of questions that might arise when using the NARUC Model:

- The NARUC Model contains a super expedited review which contains specific time performance criteria for the developer and the utility. Is it Staff's position to mandate such a super expedited process and specific time performance criteria?
- The NARUC Model contains a super expedited review in which certain interconnections must be approved on the sole basis of passing predetermined screens. Is it Staff's position to mandate such process without the provision for an engineering study of the impact of the interconnected generation?
- The NARUC Model process for applications which do not meet the super expedited process contains specific time performance criteria for the developer and the utility. Is it Staff's position to mandate such a specific time performance criteria?

- The NARUC Model does not contain an upper limit on generation size while IEEE 1547 is directed at interconnections of 10 MW and below. Does Staff propose to use the NARUC Model as a guideline for all state jurisdictional interconnections in Idaho?
- The NARUC Model does not require the interconnection customer to provide general liability insurance. Is it Staff's position that general liability insurance not be mandated to generator interconnection customers?

PacifiCorp agrees that the NARUC Model can serve as a tool or reference and the use of the word "guideline" should be in that frame of reference, and should not be applied as a rule to the Company's interconnection agreements.

It is respectfully requested that all communications regarding these comments be directed to Brian Dickman at (801) 220-4975.

Respectfully submitted this 9th day of November 2006.


Dean Brockbank
Attorney for PacifiCorp

PROOF OF SERVICE

I hereby certify that on this 9th day of November, 2006 I caused to be served, via E-mail, a true and correct copy of the foregoing REPLY COMMENTS OF PACIFICORP in Case No. GNR-E-06-02 to the following parties as shown:

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