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2009 SEP 21 AM 11:11  
IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for *Idaho Forest Group* LLC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A REVIEW OF  
THE SURROGATE AVOIDABLE  
RESOURCE (SAR) METHODOLOGY  
FOR CALCULATING PUBLISHED  
AVOIDED COST RATES

CASE NO. GNR-E-09-03

**MOTION TO PERMIT LATE FILING  
OF COMMENTS**

COMES NOW Idaho Forest Group LLC and pursuant to RP 56 moves the Commission for an Order permitting the late filing of the attached Concurrence of Idaho Forest Group, and in support thereof respectfully shows as follows:

The attached Concurrence was drafted and prepared to be filed on Friday, September 18, 2009, as required by the Commission Notice and Order No. 30873.

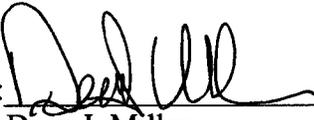
Idaho Forest Group authorized the filing of the attached Concurrence late in the day of September 18, 2009. Due, however to an interruption in electronic mail service, the undersigned did not receive from Idaho Forest Group authorization to file the attached Concurrence until after 5:00 pm on September 12, 2009.

Permitting the late filing of the attached concurrence will not prejudice the rights of any party or cause undue delay to this proceeding.

WHEREFORE, Idaho Forest Group respectfully requests that the attached  
Concurrence be accepted for late filing.

DATED this 21 day of September, 2009.

**IDAHO FOREST GROUP LLC**

By:  \_\_\_\_\_  
Dean J. Miller  
Attorney for *Idaho Forest Group LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of September, 2009, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
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Boise, ID 83720-0074  
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Fax  
Fed. Express  
Email

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BY: Heather Hule  
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IN THE MATTER OF A REVIEW OF  
THE SURROGATE AVOIDABLE  
RESOURCE (SAR) METHODOLOGY  
FOR CALCULATING PUBLISHED  
AVOIDED COST RATES

**CASE NO. GNR-E-09-03**

**CONCURRENCE OF IDAHO FOREST  
GROUP IN COMMENTS OF  
SAGEBRUSH ENERGY**

COMES NOW Idaho Forest Group (Idaho Forest) and concurs in the Comments of Sagebrush Energy LLC as follows:

Idaho Forest is engaged in the business of growing, harvesting and processing trees and forest products. It operates four lumber mills in North Idaho. Idaho Forest is in the process of developing a qualifying facility biomass cogeneration facility at its mill located in Grangeville, Idaho. Idaho Forest is actively negotiating with Avista Corporation for a purchase power agreement for the Grangeville facility. Idaho Forest estimates that the Grangeville cogeneration facility will have an annual capacity factor of approximately 90%.

The Sagebrush Energy Comments correctly observe that avoided cost rates produced the current CCCT surrogate avoided resource have been de-rated for wind QF's to take into account wind variability and lower capacity factor.

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As noted above, the expected capacity factor of Idaho Forest's intended biomass facility is approximately equal to that of the CCCT surrogate resource. By parity of reasoning, just as the CCCT SAR has been de-rated for wind projects, a wind SAR would somehow have to be up-rated for high capacity factor QF's such as Idaho Forest's planned facility. To Idaho Forest's knowledge there is no known methodology for accomplishing this necessary adjustment.

Alternatively, the Commission would be faced with having two (or maybe more) surrogate avoided resources, with the attendant expense and effort of maintaining and updating two SAR models in parallel.

Finally, if the Commission does decide to further investigate the feasibility of a wind SAR, in any Order initiating further proceedings, the Commission should re-affirm its declaration in the Notice that the current avoided costs "remain presumptively reasonable and available to QFs until changed". (*Notice and Order No. 30873, pg 3*).

DATED this 18 day of September, 2009.

**IDAHO FOREST GROUP**

By:   
\_\_\_\_\_  
Dean J. Miller  
Attorney for *Idaho Forest Group*

## CERTIFICATE OF SERVICE

I hereby certify that on the 18<sup>th</sup> day of September, 2009, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

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Idaho Public Utilities Commission  
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