IDAHO POWER®
An IDACORP Company

RECEIVED
2011 JAN 19 PM 4:55
IDAHO PUBLIC
UTILITIES COMMISSION

DONOVAN E. WALKER
Senior Counsel
dwalker@idahopower.com

January 19, 2011

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Case No. GNR-E-10-04
IN THE MATTER OF THE JOINT PETITION OF IDAHO POWER COMPANY, AVISTA CORPORATION, AND PACIFICORP DBA ROCKY MOUNTAIN POWER TO ADDRESS AVOIDED COST ISSUES AND TO ADJUST THE PUBLISHED AVOIDED COST RATE ELIGIBILITY CAP

Dear Ms. Jewell:

Enclosed for filing please find an original and seven (7) copies of the Reply Comments of Idaho Power Company in the above matter.

Very truly yours,

Donovan E. Walker

DEW:csb
Enclosures

DONOVAN E. WALKER (ISB No. 5921)
LISA D. NORDSTROM (ISB No. 5733)
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-5317
Facsimile: (208) 388-6936
dwalker@idahopower.com
lnordstrom@idahopower.com

Attorneys for Idaho Power Company

Street Address for Express Mail:
1221 West Idaho Street
Boise, Idaho 83702

RECEIVED
2011 JAN 19 PM 4:56
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT PETITION OF IDAHO POWER COMPANY, AVISTA CORPORATION, AND PACIFICORP DBA ROCKY MOUNTAIN POWER TO ADDRESS AVOIDED COST ISSUES AND TO ADJUST THE PUBLISHED AVOIDED COST RATE ELIGIBILITY CAP.	CASE NO. GNR-E-10-04 REPLY COMMENTS OF IDAHO POWER COMPANY

Idaho Power Company ("Idaho Power" or "Company"), by and through its attorney of record, Donovan E. Walker, and in response to the Notice of Modified Procedure issued in Order No. 32131 on December 3, 2010, and the various comments filed on or before December 22, 2010, now respectfully submits the following Reply Comments.

I. INTRODUCTION

On November 5, 2010, Idaho Power Company, Avista Corporation, and PacifiCorp d/b/a Rocky Mountain Power ("the Utilities") filed a Joint Petition requesting the Idaho Public Utilities Commission ("Commission") initiate an investigation into various avoided cost issues regarding the Public Utility Regulatory Policies Act of 1978 ("PURPA") Qualifying Facilities ("QF"). Additionally, the Utilities requested that the Commission issue an Interlocutory Order adjusting the published avoided cost rate eligibility cap for QFs from 10 average megawatts ("aMW") to 100 kilowatts ("kW") effective immediately.

On December 3, 2010, the Commission issued Notice of the Joint Petition and Notice of Modified Procedure, Intervention Deadline, and Oral Argument setting a Modified Procedure comment schedule with which to develop a record for its decision regarding the Joint Petition and Motion's request to lower the published avoided cost rate eligibility cap. Order No. 32131, Case No. GNR-E-10-04. Initial Comments were due on December 22, 2010; Reply Comments were due January 19, 2011; and Oral Argument is scheduled for January 27, 2011. The Commission also ordered that its decision regarding whether to reduce the published avoided cost rate eligibility cap become effective on December 14, 2010. *Id.*, at 6-7. In that Notice, the Commission stated that it "will first take up the request to reduce the eligibility cap." *Id.*, at 5. The Commission set out three specific topics that it is interested in receiving comments upon:

> (1) the advisability of reducing the published avoided cost eligibility cap; (2) if the eligibility cap is reduced, the appropriateness of exempting non-wind QF projects from the reduced eligibility cap; and (3) the consequences of dividing larger wind projects into 10 aMW projects to utilize the published rate.

Id.

Idaho Power filed initial Comments addressing these three topics, supporting the initial request to reduce the published avoided rate eligibility cap, and seeking application of that published rate eligibility reduction to all PURPA QF projects. Comments were also filed by Avista, Rocky Mountain Power, and Commission Staff. Additionally, several public comments were filed before and after the comment deadline and many of the intervening parties also filed comments.

II. IDAHO POWER'S REPLY COMMENTS

A. There is Sufficient Evidence to Warrant Commission Action.

Many of the comments allege that the utilities have not put forth sufficient evidence to justify Commission action as requested in the Joint Petition. Idaho Power disagrees. First, while not exhaustive, the Joint Petition sets forth sufficient facts that are of such a magnitude and extreme public interest as to support the relief requested on a stand-alone basis. Commission Staff agrees, and struck upon the heart of the matter when it stated:

> Forcing utilities to acquire generation they do not need increases rates for customers. Moreover, it negates the integrated resource planning process wherein a utility's needs can be appropriately matched with resources at the lowest cost. By default, PURPA has become one of the primary means for the utilities in Idaho to acquire new generation, but Staff is not convinced that it is the most effective, least costly way, or that it is in the best interests of ratepayers.

Staff Comments, p. 5. Staff went on to recommend:

> Staff supports the utilities' Petition seeking to reduce the avoided cost eligibility cap from the current 10 aMW to 100 kW. Staff is convinced that the problem described by the utilities in their Petition is real and requires immediate attention by the Commission. There is clear evidence in all three utilities' service territories that large wind projects are

> purposely being disaggregated into smaller 10 aMW projects in order to be eligible for published avoided cost rates. This issue alone, Staff believes, provides sufficient justification for lowering the eligibility cap for published rates.

Id. Staff ultimately acknowledges, "Published avoided cost rates, at least as currently computed, are no longer the throttle controlling new development because they may not reflect either the true value or need for new generation." *Id.*, at 7. This conclusion was also reached, and examined, by Idaho Power in its Comments, "Idaho Power is forced to purchase this [QF] power with no regard to whether it is needed on its system, with no regard to whether it is called for in the Company's IRP [Integrated Resource Planning] process, and with no regard to whether there are other lower cost alternatives for its customers." Idaho Power Comments, p. 24.

Second, with the submission of its initial Comments in this case, Idaho Power believes that what was already a sufficient case requiring immediate Commission action has been further shown to be a compelling case of immediate and grave public interest. As of December 20, 2010, the total amount of QF wind generation proposed for Idaho Power's system (840 megawatts ("MW")) exceeds all of the previously developed QF wind generation operating on Idaho Power's system since the passage of PURPA in 1978 by more than 2 ½ times (326 MW). The total amount of non-wind QF generation operating on Idaho Power's system is dwarfed by comparison with a total of 219 MW. Furthermore, as stated in Idaho Power's initial Comments, the nature and flaws inherent with the Surrogate Avoided Resource ("SAR") methodology used to establish the published avoided cost rate, combined with the disaggregation and configuration of what are or should be larger projects into 10 aMW increments in order to qualify for the published rates, when applied to just 614 MW of the proposed QF projects, results in an increased cost to customers estimated at more than $48 million annually to pay for QF generation over current forward energy market rates. This potentially drastic disparity in customer rates as well as the continued, unchecked growth of QF wind projects on Idaho Power's system justifies immediate Commission action.

B. The Commission Has the Authority to Modify the Published Rate Eligibility Cap, to Establish Avoided Cost Rates, and to Approve, Reject, and/or Reform PURPA QF Contracts in the Public Interest.

The Northwest and Intermountain Power Producers Coalition ("NIPPC") alleges infirmities with the Commission's procedure and questions the Commission's authority to grant the relief requested by the Utilities. The Commission has the jurisdiction, authority, and, in fact, the obligation to act in such a situation as outlined in the Joint Petition and Comments of the Utilities. Quite clearly, the Commission has the authority to set avoided cost rates, to order electric utilities to enter into fixed-term obligations for the purchase of energy from QFs, and to implement Federal Energy Regulatory Commission ("FERC") rules. PURPA, 16 U.S.C. § 824a; 18 C.F.R. § 292; *Connecticut Light and Power Co.*, 70 F.E.R.C. ¶ 61,012, 61,024 (1995).

As stated in Idaho Power's Comments, the incentive mandated by PURPA is not to incent renewable energy projects with an incentive price that is paid to a QF and, in fact, an incentive price for QFs is illegal under PURPA. Idaho Power Comments, p. 4. PURPA requires the Commission to set prices at the utility's avoided cost, which is to reflect the incremental cost to an electric utility of electric energy or capacity or both, which, but for the purchase from the QF, such utility would generate itself or purchase from another source. The incentive to QF development from PURPA is not in the price that a QF is entitled to but in the fact that the utility is required to contract with the QF.

See 16 U.S.C. § 824a-3(a). Idaho Power adheres to this federal PURPA mandate by making available Firm Energy Sales Agreements ("FESA") for any QF seeking to sell energy to Idaho Power. The Commission accomplishes the purpose of PURPA by requiring Idaho Power to enter into FESAs, or contracts, with QF projects, requiring specific terms and conditions to be included in these FESAs with QFs, and by requiring its review and approval of all QF FESAs prior to the agreement becoming effective.

As the designated regulatory authority for public utilities in the state of Idaho, the Commission plays a unique and special role in the contracting process and validity of contracts entered into by the public utilities that it regulates. In the state of Idaho, contracts are afforded constitutional protection against interference from the State. Idaho Const. Art. I, § 16. However, despite this constitutional protection, the Commission may annul, supersede, or reform the contracts of the public utilities it regulates in the public interest. *Agricultural Products Corp. v. Utah Power & Light Co.*, 98 Idaho 23, 29, 557 P.2d 617, 623 (1976) ("Interference with private contracts by the state regulation of rates is a valid exercise of the police power, and such regulation is not a violation of the constitutional prohibition against impairment of contractual obligations."); *See also Federal Power Comm's v. Sierra Pac. Power Co.*, 350, U.S. 348, 76 S.Ct. 368, 100 L.Ed. 388 (1956); *United Gas Pipe Line Co. v. Mobile Gas Service Corp.*, 350 U.S. 332, 76 S.Ct. 373, 100 L.Ed. 373 (1956) (U.S. Supreme Court finding that rates fixed by contract could be modified only "when necessary in the public interest"). The Commission may interfere in such a way with the contracts of a public utility only to prevent an adverse affect to the public interest. *Agricultural Products*, 98

Idaho at 29. "Private contracts with utilities are regarded as entered into subject to reserved authority of the state to modify the contract in the public interest." *Id.*

Here, there are just such public interest implications as those contemplated and required by the *Sierra-Mobile* doctrine and *Agricultural Products* and its progeny, as to invoke and authorize the Commission – in the exercise of its legislative, state police power and authority to protect the public in the contractual rates that it sets and the public utility contracts that it reviews for the purchase of energy from QF projects under PURPA.

NIPPC's alleged procedural issues related to the Commission's effective date of December 14, 2010, and NIPPC's alleged issues related to the filed rate doctrine and retroactive ratemaking are moot and inconsequential in a case such as this with such large and grave public interest ramifications as to invoke the Commission's authority to annul, supersede, or reform contracts with public utilities.

In addition, NIPPC's reliance on *Arkansas Louisiana Gas v. Hall* as a prohibition from this Commission engaging in retroactive ratemaking is misplaced. NIPCC Comments at pp. 9-10. *Arkansas Louisiana Gas* involved parties (one of which was a utility) attempting to agree, via private contract, to rates different than tariffed rates. That case did not challenge whether a utility regulator has the authority to modify contracts entered into by public utilities so as to ensure the public interest is served. In fact, the Supreme Court reiterated its position that regulators may, under "extraordinary circumstances . . . abrogate existing contractual arrangements." 453 U.S. 571, 582. As explained above and in Idaho Power's Comments, the unchecked proliferation of QF projects in combination with a current published avoided cost rate that is substantially higher than current market rates is creating an extraordinary circumstance for Idaho ratepayers. There is nothing in *Arkansas Louisiana Gas* that supports NIPCC's contention that the filed rate doctrine somehow prohibits this Commission from modifying contracts entered into by public utilities if doing so serves the public interest.

Moreover, and as explained above, PURPA and FERC have delegated broad, discretionary authority to this Commission when it comes to implementing PURPA. This Commission is charged with upholding the public interest. Thus, this Commission has both the statutory authority and well-established precedent from the state and federal judiciary to invoke the Commission's authority to annul, supersede, or reform contracts with public utilities so that the public interest is served.

C. Reduction of the Published Rate Eligibility Cap Upholds Federal Law.

NIPPC alleges that reducing the eligibility cap violates federal law. NIPPC Comments at pp. 6-8. This is incorrect. Federal law requires the Commission to put into effect standard rates for utility purchases from QFs with a design capacity of 100 kW or less. 18 C.F.R. § 292.304(c)(1). Standard rates for QFs larger than 100 kW are completely discretionary with the Commission. 18 C.F.R. § 292.304(c)(2). Federal law specifically requires that rates for QF purchases "be just and reasonable to the electric consumer of the electric utility and in the public interest." 18 C.F.R. § 292.304(a)(1)(i). Federal law requires that utility customers be economically indifferent to the effects of whether power is purchased from a QF or otherwise generated or purchased by the utility. *Southern California Edison Co.,* 71 F.E.R.C. ¶ 61,269, 1995 WL 327268 (F.E.R.C. 1995) ("The intention [of PURPA] was to make ratepayers indifferent as to whether the utility used more traditional sources of power or the newly-encouraged alternatives.").

When the utility is forced to buy QF power at a price in excess of its true avoided cost, or when the energy is not needed to serve loads, customers are no longer indifferent. When it is demonstrated that the QF purchases, regardless of need, will result in substantially increased costs for customers over less costly, and more reliable, alternative sources of energy, the public interest demands correction of the inequity. Such inequity has been shown to exist with the current application of the SAR methodology to the large amount of QF generation proposed for Idaho Power's system. Federal and state law does not prohibit and, in fact, requires corrective action.

D. <u>Published Rates are Not Guaranteed, But Subject to the Public Interest</u>.

Several comments reference the "certainty" of the published avoided cost rate for long-term planning, financing, and other considerations. NIPPC warns that "This will surely chill the market for QFs . . . ." NIPPC Comments p. 12. As stated above, "Private contracts with utilities are regarded as entered into subject to reserved authority of the state to modify the contract in the public interest." *Agricultural Products*, 98 Idaho at 29. All PURPA QF contracts are filed for review by the Commission. All PURPA QF contracts contain provisions that state the FESA is subject to the jurisdiction of the Commission and is only effective, and final, upon Commission approval of all terms and provisions of the contract without change or condition. Only after a PURPA QF contract has been executed by both parties and approved by the Commission are the terms, conditions, and pricing within that specific QF contract certain.

Published avoided cost rates change. For example, rates are changed when new natural gas forecasts are released. Methodologies change, and have done so numerous times since the inception of PURPA. The alleged notion that the published rates are "certain" and required for projects to rely upon for project planning and financing is misplaced. The published rates that are in place at the time a project is in initial development is not necessarily the published rates that will be in effect at the time the project executes the contract. Additionally, as stated above, nothing in the FESA is even final until after Commission review and approval. Anyone that relies upon a FESA, including the rates contained therein, as locked in stone prior to Commission review and approval of the same does so at their own peril and risk. Commission review is not a rubber stamp formality once the FESA is signed. It is, and must be, a meaningful review of the terms and conditions, reasonableness, and prudency of the contractual relationship and obligations. It must be a meaningful review of whether, as a whole, the FESA is in the public interest.

E. The IRP-Based Avoided Cost Price is Not Always Below the SAR-Based Avoided Cost Pricing.

The IRP-based methodology does not automatically result in an avoided cost calculation that is lower than published avoided cost rates based on the SAR methodology. As stated by Commission Staff and Idaho Power, the IRP-based methodology recognizes and considers the individual generation characteristics of projects and thus produces different rates for different projects. Idaho Power Comments, pp. 8-10; Commission Staff Comments, p. 4. The IRP-based methodology arrives at a price that better reflects a value that the generation represents on the utility's system, unlike the SAR-based methodology, which promotes a project to generate as much and as often as it can, regardless of the value to the utility or the utility's need for the energy. A resource that provides energy when the utility needs energy to serve load, during peak hours, will see a corresponding increase in pricing through the AURORAxmp® ("AURORA") based IRP-methodology. Additionally, if a resource provides energy when the utility does not need it, and is otherwise surplus, a corresponding reduction in the rates results for the minimal – or no – value that this energy provides to the utility and its customers.

For example, a project like a geothermal resource may run flat-out during all months and all hours providing energy during peak times when it is needed most, but also providing energy at off-peak times when it is not needed, thus providing little to no value. The energy price determined through the IRP-based methodology at least provides some recognition of this fact and sets a price accordingly, unlike the SAR methodology. Wind, for example, particularly because of its low capacity factor, intermittency, and poor generation profile relative to peak loads, generally does not come out of the IRP-based pricing methodology with a price that is as high as that of the SAR method. *See* Case No. IPC-E-10-24, Rockland Wind Project, (for the recently approved Rockland Wind project, the energy price identified by the AURORA run was $62.71, or $56.21 after a discount of $6.50 per MW-hour for wind integration). Consequently, this results in the great aversion that wind developers have to negotiating a QF contract under the IRP-based methodology and the resulting disaggregation of what should legitimately be larger projects into 10 aMW increments to qualify for the published rates instead.

Another example on the other end of the spectrum would be a representative solar project. When a typical southern Idaho solar project is run through AURORA, the IRP-based avoided cost methodology results can be somewhat surprising. A recent run of a 20 MW nameplate solar energy project, on-line in 2012, results in a 20-year levelized price of just over $97 per megawatt-hour ("MWh"). Consequently, the comments, arguments, and accusations that Idaho Power is simply trying to push the IRP-based methodology because it always results in a price that is less than the published rate are not true. The IRP-based methodology results in an AURORA energy price that is less than published rates for those resources that provide little to no value to the Company's system and the loads that it is required by law to meet.

F. The Published Rate Eligibility Cap Reduction Should Apply to All QF Projects.

Commission Staff recommends that the Commission reduce the published rate eligibility cap to 100 kW, but only for wind QFs. While Idaho Power appreciates and respects Staff's position, the Company believes that all PURPA QF projects should be included in the published avoided cost rate eligibility cap reduction for the simple reason that they all suffer from, and contribute to, the same SAR-methodology problems mentioned above and discussed in Idaho Power's initial Comments. All QFs generate during light load hours and contribute to the price and cost differentials already discussed. The lack of any consideration of the utility's need for the energy, or load, in relation to when the QF supplies generation that the utility must take from it does not change because the QF is a non-wind resource.

Additionally, with the cumulative nature of more than thirty years of QF projects entering onto Idaho Power's system, as well as the more recent phenomenon of larger and larger projects that intentionally break themselves into 10 aMW increments so as to qualify for published rates, it can no longer be said that the financial impact to the utility's customers from any QF project, no matter how small, has a "small" impact to the rates that customers must pay for electricity. While the scale of non-wind QFs is much smaller, many of the same problems are, and the same financial harm is, caused by non-wind QFs just the same. A reduction in the published rate eligibility should apply equally to all QF projects.

G. <u>AURORA Modeling Capabilities</u>.

As stated, Idaho Power believes that all QF projects, even smaller projects, suffer from, and contribute to, the same SAR-methodology problems mentioned above and discussed in Idaho Power's initial Comments. However, in researching the AURORA modeling capabilities, the software provider has advised that there may be some issues with the software producing dependable results for projects that are less than 2 MW. One of reasons being that the pricing in the IRP-based methodology is a result of subtracting the base model results (that do not include the proposed project) from the model results, including the proposed project. If the project is small enough that it does not trigger changes in the base model operations, i.e., it is lost in the rounding to MWs or MWhs, then the base model results could be identical to the modeled results that include the project. This would result in an AUROA pricing of zero.

While Idaho Power believes using the IRP-based methodology for any project above 100 kW is the right answer, there are some limitations to modeling projects below a certain size. To remedy this situation, Idaho Power proposes to work with Staff to reach an appropriate solution for analyzing these smaller projects. Initially, Idaho Power anticipates scaling smaller projects up to a larger size, retaining the original project's generation profile, and calculating the IRP-based avoided cost rate. In any event, the point is that there are some technical issues that will need to be resolved for those small projects that fall into a range from 10 kW to around 2 MW. Idaho Power is confident that it can, along with Commission Staff, develop a workable solution consistent with the approved IRP-based methodology.

III. CONCLUSION

A situation has developed with the rapid and large scale proliferation of proposed QF generation for Idaho Power's system at levels that exceed the total load on the Company's entire system during minimum load hours – and exceeds 1/3 of the total system load for the Company's all-time system peak load. This large scale of proposed QF generation also comes with a large scale price and cost to Idaho Power's customers. This cost, regardless of the question of whether the generation is needed or not, exceeds the cost of other available generation sources by an estimated $48 million on an annual basis, and is not in the public interest. The price and cost disparity that has been demonstrated to exist with just a portion of the now pending contractual PURPA QF obligations filed for review with the Commission is of such a magnitude as to invoke the Commission's inherent authority to annul, supersede, or reform in the public interest the contracts of the public utilities it regulates.

As stated in the Company's Comments, it does not expect the parties, nor the Commission, to solve all of the issues or problems identified with avoided costs and QF generation at this moment. However, we are fortunate that an existing, approved avoided cost methodology, the IRP-based methodology, exists and, as demonstrated, is a very reasonable method for addressing some of the most pressing problems raised in this proceeding – particularly that of introducing some concept of need and value of these generation sources on Idaho Power's system – while these important issues are considered by the parties and the Commission.

Idaho Power respectfully urges the Commission to reduce the published avoided cost rate eligibility cap for PURPA QFs from 10 aMW to 100 kW.

DATED at Boise, Idaho, this 19th day of January 2011.

DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of January 2011 I served a true and correct copy of REPLY COMMENTS OF IDAHO POWER COMPANY upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff Donald L. Howell, II Kristine Sasser Deputy Attorneys General Idaho Public Utilities Commission 472 West Washington P.O. Box 83720 Boise, Idaho 83720-0074	_X_ Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email don.howell@puc.idaho.gov kris.sasser@puc.idaho.gov
Avista Corporation Michael G. Andrea Clint Kalich Avista Corporation 1411 East Mission Avenue – MSC-23 P.O. Box 3727 Spokane, Washington 99220-3727	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email michael.andrea@avistacorp.com clint.kalich@avistacorp.com
PacifiCorp d/b/a Rocky Mountain Power Daniel E. Solander J. Ted Weston Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, Utah 84111	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email daniel.solander@pacificorp.com ted.weston@pacificorp.com
Bruce Griswold PacifiCorp 825 NE Multnomah Portland, Oregon 97232	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email bruce.griswold@pacifiCorp.com
Exergy, Grand View Solar, J. R. Simplot, Northwest and Intermountain Power Producers Coalition, & Board of Commissioners of Adams County, Idaho Peter J. Richardson Greg Adams RICHARDSON & O'LEARY, PLLC 515 North 27th Street P.O. Box 7218 Boise, Idaho 83702	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email peter@richardsonandoleary.com greg@richardsonandoleary.com

Exergy Development Group
James Carkulis, Managing Member
Exergy Development Group of Idaho, LLC
802 West Bannock Street, Suite 1200
Boise, Idaho 83702

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email jcarkulis@exergydevelopment.com

Grand View Solar II
Robert A. Paul
Grand View Solar II
15960 Vista Circle
Desert Hot Springs, California 92241

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email robertapaul08@gmail.com

J.R. Simplot Company
Don Sturtevant, Energy Director
J.R. Simplot Company
One Capital Center
999 Main Street
P.O. Box 27
Boise, Idaho 83707-0027

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email don.sturtevant@simplot.com

Northwest and Intermountain Power Producers Coalition
Robert D. Kahn, Executive Director
Northwest and Intermountain Power
Producers Coalition
1117 Minor Avenue, Suite 300
Seattle, Washington 98101

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email rkahn@nippc.org

Renewable Energy Coalition
Thomas H. Nelson, Attorney
P.O. Box 1211
Welches, Oregon 97067-1211

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email nelson@thnelson.com

John R. Lowe, Consultant
Renewable Energy Coalition
12050 SW Tremont Street
Portland, Oregon 97225

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email jravenesanmarcos@yahoo.com

Cedar Creek Wind, LLC, & Dynamis Energy, LLC
Ronald L. Williams
WILLIAMS BRADBURY, P.C.
1015 West Hays Street
Boise, Idaho 83702

____Hand Delivered
____U.S. Mail
____Overnight Mail
____FAX
X Email ron@williamsbradbury.com

Cedar Creek Wind, LLC Scott Montgomery, President Cedar Creek Wind, LLC 668 Rockwood Drive North Salt Lake, Utah 84054	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email scott@westernenergy.us
Dana Zentz, Vice President Summit Power Group, Inc. 2006 East Westminster Spokane, Washington 99223	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email dzentz@summitpower.com
Dynamis Energy, LLC Wade Thomas, General Counsel Dynamis Energy, LLC 776 East Riverside Drive, Suite 15 Eagle, Idaho 83616	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email wthomas@dynamisenergy.com
Idaho Windfarms, LLC Glenn Ikemoto Margaret Rueger Idaho Windfarms, LLC 672 Blair Avenue Piedmont, California 94611	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email glenni@EnvisionWind.com Margaret@EnvisionWind.com
Interconnect Solar Development, LLC R. Greg Ferney MIMURA LAW OFFICES, PLLC 2176 East Franklin Road, Suite 120 Meridian, Idaho 83642	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email greg@mimuralaw.com
Bill Piske, Manager Interconnect Solar Development, LLC 1303 East Carter Boise, Idaho 83706	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email billpiske@cableone.net
Intermountain Wind LLC Dean J. Miller McDEVITT & MILLER LLP 420 West Bannock Street P.O. Box 2564 Boise, Idaho 83701	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX __X__ Email joe@mcdevitt-miller.com

Paul Martin Intermountain Wind LLC P.O. Box 353 Boulder, Colorado 80306	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email paulmartin@intermountainwind.com
North Side Canal Company and Twin Falls Canal Company Shelley M. Davis BARKER ROSHOLT & SIMPSON, LLP 1010 West Jefferson Street, Suite 102 P.O. Box 2139 Boise, Idaho 83701-2139	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email smd@idahowaters.com
Brian Olmstead, General Manager Twin Falls Canal Company P.O. Box 326 Twin Falls, Idaho 83303	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email olmstead@tfcanal.com
Ted Diehl, General Manager North Side Canal Company 921 North Lincoln Street Jerome, Idaho 83338	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email nscanal@cableone.net
Board of Commissioners of Adams County, Idaho Bill Brown, Chair Board of Commissioners of Adams County, Idaho P.O. Box 48 Council, Idaho 83612	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email bdbrown@frontiernet.net
Birch Power Company Ted S. Sorenson, P.E. Birch Power Company 5203 South 11th East Idaho Falls, Idaho 83404	____Hand Delivered ____U.S. Mail ____Overnight Mail ____FAX _X_ Email ted@tsorenson.net

Donovan E. Walker