

Thomas H. Nelson, ISB 7034
PO Box 1211
Welches, OR 97067
Tel: 503.622.3262
Email: nelson@thnelson.com
Attorney for Renewable Energy Coalition

RECEIVED
2010 NOV 10 AM 8:35
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE JOINT
PETITION OF IDAHO POWER
COMPANY, AVISTA CORPORATION,
AND ROCKY MOUNTAIN POWER TO
ADDRESS AVOIDED COST ISSUES
AND JOINT MOTION TO ADJUST
THE PUBLISHED AVOIDED COST
RATE ELIGIBILITY CAP

CASE NO. GNR-~~E~~10-04

RENEWABLE ENERGY COALITION'S
OPPOSITION TO IMMEDIATE
ADMINISTRATIVE ACTION

On November 5, 2010, the three major investor-owned electric utilities operating in Idaho filed a joint petition to reduce the avoided-cost rate eligibility cap for all types of qualifying facilities ("QFs") to 1/100th of its current level, i.e., from 10,000 kilowatts to 100 kilowatts. This joint petition was filed even though the documentation supporting it clearly establishes that such a reduction would affect each of the three utilities very differently, was clearly a set of issues associated exclusively with large commercial scale wind projects, and was not related to any other type of existing or proposed QFs. Renewable Energy Coalition, an Oregon-based consortium of existing base-load hydroelectric and biomass QFs located in the Northwest ("REC"), opposes the joint petition on the grounds that the relief sought is overly expansive and unnecessary. Consequently, REC respectfully requests that the Commission take no immediate action to modify the eligibility cap for avoided-cost purchases from QFs, i.e. that the

Commission either dismiss the petition outright or set the matter for full administrative consideration. In addition REC requests that if there are any subsequent changes or restrictions to the application of the eligibility cap, they not impact non-wind QFs.

REC reserves the right to participate fully in any administrative proceeding established consequent to the joint petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas H. Nelson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Thomas H. Nelson, ISB 7034
PO Box 1211
Welches, OR 97067
Tel: 503.622.3262
Email: nelson@thnelson.com
Attorney, Renewable Energy Coalition

CERTIFICATE OF SERVICE

I hereby certify that I have on this 8th day of November, 2010, I served a copy of the foregoing Opposition to Immediate Administrative Action on the entities designated as served by the Joint Petitioners in the captioned docket on November 5, 2010, by serving an electronic copy on their email addresses of record as set forth below. The original and seven (7) copies of this document were filed with the Commission electronically and by United States Mail, postage prepaid, on the 8th of November, 2010.

Jean Jewell, Secretary Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 jjewell@puc.state.id.us	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- <u>X</u> (Original + 7 Copies) -- -- <u>X</u>
Scott Woodbury Idaho Public Utilities Commission 472 West Washington Street P.O. Box 83720 Boise, ID 83720-0074 scott.woodbury@puc.idaho.gov	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- <u>X</u>
Donovan Walker Lisa Nordstrom, Esq. Idaho Power P.O. Box 70 Boise, ID 83702 lnordstrom@idahopower.com dwalker@idahopower.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- <u>X</u>
Daniel Solander Rocky Mountain Power One Utah Center 201 S. Main Street, Suite 2300 Salt Lake City, UT 84111 Daniel.solander@pacificorp.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- <u>X</u>
Michael G. Andrea Senior Counsel Avista Corporation 1411 E. Mission Avenue, MSC-23 Spokane, WA 99202 michael.andrea@avistacorp.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- <u>X</u>
Sagebrush Energy, LLC Dean J. Miller MCDEVITT & MILLER P.O. Box 2564 Boise, Idaho 83701 joe@mcdevittmiller.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- <u>X</u>

Avista Corporation Clint Kalich 1411 E. Mission Avenue PO Box 3727 Spokane, WA 99202 Clint.kalich@avistacorp.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
Bruce Griswold PaciCorp 825 NE Multnomah Portland, OR 97232 Bruce.griswold@Pacifcorp.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
J. Ted Weston Rocky Mountain Power 201 South Main Street, Suite 2300 Salt Lake City, UT 84111 Ted.weston@pacifcorp.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
Peter Richardson Greg Adams Richardson & O'Leary PLLC 515 North 27th Street PO Box 7218 Boise, ID 83702 peter@richardsonandoleary.com greg@richardsonandoleary.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
Idaho Forest Group, LLC Dean J. Miller MCDEVITT & MILLER P.O. Box 2564 Boise, Idaho 83701 joe@mcdevittmiller.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
Sorenson Engineering, Inc. Ted S. Sorenson, P.E. 5203 South 11th East Idaho Falls, ID 83404-7692 ted@tsorenson.net	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
American Falls Reservoir District 2 Lynn Harmon 409 North Apple Street Shoshone, ID 83352 lynnharmon@cableone.net	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X
Aaron F. Jepson Blue Ribbon Energy LLC ArronEsq@aol.com	Hand Delivered U.S. Mail Facsimile Federal Express Electronic Mail	-- -- -- -- X

Idaho Conservation League
Benjamin Otto
710 North Sixth Street
PO box 844
Boise, ID 83701
botto@idahoconservation.org

Hand Delivered --
U.S. Mail --
Facsimile --
Federal Express --
Electronic Mail X

Idaho Windfarms, LLC
Glenn Ikemoto
Idaho Windfarms, LLC
672 Blair Avenue
Piedmont, California 94611
glenni@pacbell.net

Hand Delivered --
U.S. Mail --
Facsimile --
Federal Express --
Electronic Mail X

Faulkner Brothers Hydro
Mitch Arkoosh
28989 South 1875 East
Gooding, ID 83330
markoosh@magiclink.com

Hand Delivered --
U.S. Mail --
Facsimile --
Federal Express --
Electronic Mail X

This Certificate of Service is executed on November 8, 2010, at Zigzag, Oregon.



Thomas H. Nelson
PO Box 1211
Welches, OR 97067-1211
Tel: 503.622.3262
Cell: 503.709.6397
E-Mail: nelson@thnelson.com

Attorney, Renewable Energy Coalition