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December 22, 2010

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities commission
472 W. Washington
Boise, ID 83702

RE: GNR-E-10-04

Dear Ms. Jewell:

Please file the enclosed original and seven copies of the Comments of Interconnect Solar Development, LLC in the above case.

Thank you for your consideration of this matter. Please feel free to call me should you have any questions.

Sincerely,


Greg Ferney

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Attorneys for Interconnect Solar Development, LLC

BEFORE THE IDAHO PUBLIC UTILITES COMMISSION

IN THE MATTER OF THE JOINT)	Case No. GNR-E-10-04
PETITION OF IDAHO POWER COMPANY,))	
AVISTA CORPORTION, AND ROCKY)	COMMENTS IN OPPOSITION TO
MOUNTAIN POWER TO ADDRESS)	JOINT PETITION TO ADJUST
AVOIDED COST ISSUES AND JOINT)	PUBLISHED AVOIDED COST RATE
MOTION TO ADJUST THE PUBLISHED)	ELIGIBILITY CAP
<u>AVOIDED COST RATE ELIGIBILITY CAP)</u>	

Interconnect Solar Development, LLC (“Interconnect Solar” or “ISD”) is a solar energy company with two proposed projects in Owyhee County, Idaho. Both projects are near the town of Murphy, Idaho and are less than 10 aMW in size. Interconnect Solar files these Comments in Opposition to the Joint Petition of Idaho Power Company, Avista Corporation and PacifiCorp dba Rocky Mountain Power and requests that the Commission refuse to grant the Order adjusting the published avoided cost rate eligibility cap (“Cap”) for QFs from 10 MW to 100 kW.

A. Solar Energy QFs Should Be Exempt from any Reduction in the 10 MW Eligibility

Cap: Interconnect Solar concurs in the comments of the J.R. Simplot Company previously filed in this case, that “non-wind PURPA resources should be excluded from the Joint Petition” of the three utilities. As noted in those comments, solar QFs “have very different generating

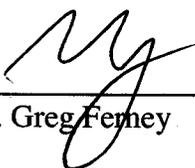
characteristics from wind” and “should therefore not be caught in the overly broad sweep of the Joint Motion.” *Answer of the J.R. Simplot Company, GNR-E-1—04, p. 3.*

No evidence has yet been presented by any of the three utilities in the case. Only allegations have been made, all referencing the system impact of intermittent wind resources. Solar power is not ‘intermittent’ and instead has a firm nature to its production that directly matches a utility’s need for energy and capacity during heavy load hours. As noted in Idaho Power’s Integrated Resource Plan, solar energy production closely matches the Company’s peak demand occurring “. . . during July typically between 4:00 p.m. and 8:00 p.m. and is primarily due to air conditioning and irrigation load. *Idaho Power Company, 2009 IRP, p. 65.* Continued development of solar energy PURPA resources that are not intermittent and delivered during peak summer hours should be encouraged through the continuation of the 10 MW Cap. Solar PURPA resources are not the cause of the alleged resource problem for any of the three utilities.

The 10 MW Cap and standard avoided cost rates should remain in place for non-wind PURPA facilities.

Dated this 22 day of December, 2010.

Respectfully submitted,



R. Greg Ferney

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 22 day of December, 2010, I caused to be served a true and correct copy of the foregoing document upon the following individuals via Email:

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