ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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IDAHO PUBLIC
UTILITIES COMMISSION

April 22, 2011

VIA OVERNIGHT DELIVERY

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

RE: IN THE MATTER OF THE COMMISSION'S INVESTIGATION INTO DISAGGREGATION AND AN APPROPRIATE PUBLISHED AVOIDED COST ELIGIBILITY CAP STRUCTURE FOR PURPA QUALIFYING FACILITIES. IDAHO PUBLIC UTILITIES COMMISSION CASE NO. GNR-E-11-01

Dear Ms. Jewell:

Please find enclosed for filing in the above-captioned case an original and nine (9) copies of Rocky Mountain Power's Rebuttal Testimony of Bruce Griswold.

Sincerely,

Jeffrey Larsen /MW

Jeffrey K. Larsen
Vice President, Regulation

Cc: GNR-E-11-01 Service List

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of April, 2011, I caused to be served, via E-mail, a true and correct copy of Rocky Mountain Power's Rebuttal Testimony in Case No. GNR-E-11-01 to the following:

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S INVESTIGATION INTO DISAGGREGATION AND AN APPROPRIATE PUBLISHED AVOIDED COST RATE ELIGIBILITY CAP STRUCTURE FOR PURPA QUALIFYING FACILITIES	)	**CASE NO. GNR-E-11-01** **Rebuttal Testimony of Bruce W. Griswold**

ROCKY MOUNTAIN POWER

CASE NO. GNR-E-11-01

April 2011

1 **Q. Please state your name, business address and position with PacifiCorp dba**
2 **Rocky Mountain Power (the Company).**
3 A. My name is Bruce W. Griswold. My business address is 825 NE Multnomah,
4 Suite 600, Portland, Oregon. I am the Director, Short-term Origination and QF
5 Contracts at PacifiCorp Energy, which is responsible for the Company's electric
6 generation and energy trading functions.
7 **Q. Are you the same Bruce W. Griswold who provided direct testimony in this**
8 **proceeding?**
9 A. Yes.
10 **Purpose and Summary of Testimony**
11 **Q. What is the purpose of your testimony?**
12 A. My testimony will respond to and compare sets of rules proposed by Mr. Rick
13 Sterling of the Idaho Public Utility Commission staff ("Staff"), Ms. Megan
14 Decker of Renewable Northwest Project ("RNP"), and Mr. Benjamin Otto of the
15 Idaho Conservation League ("ICL") to reinstate the 10 aMW eligibility threshold
16 but restrict disaggregation of large single wind and solar projects. I will also
17 address why the Company's proposed set of rules and procedures from my direct
18 testimony (as updated in my rebuttal testimony) will work more effectively than
19 those proposed by others.
20 **Q. Please summarize your testimony.**
21 A. While a set of criteria to limit the disaggregation of large wind and solar projects
22 can be developed and implemented, it is clear from the Company's experience
23 that any such approach is not fool-proof and it is our experience that it can

ultimately be manipulated by large project developers. The Company's first position continues to be that the correct method of ensuring that there are controls regarding disaggregation is for the Commission to make permanent the 100 kW eligibility threshold for wind and solar QFs seeking Idaho's published avoided cost prices. Absent that directive by the Commission, Rocky Mountain Power has completed a comparison of the three strawman proposals submitted by the Staff, RNP and ICL to the Company's proposed strawman and prepared a table comparing the four proposals, attached hereto as Rocky Mountain Power Exhibit No. 204. After that review, the Company believes that its proposed strawman is still the most reasonable of the four proposals before the Commission and will provide the best assurance that large QFs will not receive the Idaho published avoided cost rates. However, the Company believes that a number of the elements of Staff's proposal are valid and the Company has modified its proposal to incorporate those elements that strengthen the Company's proposal. Even with specific disaggregation criteria in place, the ultimate eligibility test should remain whether the QF (together with any other wholesale generators developed in concert with the QF) exceeds the size eligibility cap. Therefore, the Commission should require developers to demonstrate that they are in fact not disaggregating a large project and retain the discretion to deny eligibility for published rates in the event a large QF finds a way to meet the eligibility criteria but is found by the Commission to be a large QF on other grounds.

1 **Review of Strawman Proposals**

2 **Q. Please recap Rocky Mountain Power's strawman proposal.**

3 A. Rocky Mountain Power's proposed rules are modeled after a Minnesota Statute
4 216F.011, adopted in 2007.[1] This statute established rules for size determination
5 when determining permitting requirements for wind projects. While the rules are
6 not based on any specific megawatt size limit the Company proposes using a
7 nameplate capacity of 10 MW as an absolute threshold versus the 10 aMW
8 threshold. The 10 aMW threshold is a somewhat subjective level and can lead to
9 disputes between the utility and the QF both on the acceptance by the utility that
10 the QF project meets the 10 aMW threshold and on the monitoring and
11 enforcement of the threshold throughout the term of the power purchase
12 agreement. This is especially true when the estimated output from multiple wind
13 or solar plants must be added together in the evaluation. Adding up nameplate
14 capacity is very straightforward with no room for disagreement over proposed
15 production of each QF system. The nameplate capacity of the applicant QF must
16 be combined with the nameplate capacity of any other wholesale generator[2] that:
17 (1) is located within five miles of the QF;
18 (2) is constructed within 24-months of the QF; and
19 (3) exhibits characteristics of being a common development.

[1] Minn. Stat. § 216F.011 (2010) (available at https://www.revisor.mn.gov/statutes/?id=216F.011).

[2] The Company uses the term "wholesale generator" to make clear that the rules apply to a QF that is developed in concert with a non-QF project.

1 Under Rocky Mountain Power's proposal, the utility would be responsible
2 for determining the size of the QF using information provided by the QF project
3 developer. The Company would provide a written determination within 30 days of
4 receipt of the request with any dispute resolved by the Commission. The
5 determination would be completed as part of the normal due diligence process
6 prior to the power purchase agreement being prepared. The QF would warrant
7 that it meets the size eligibility threshold at the purchase power agreement
8 ("PPA") execution and not make any changes in ownership, control, or
9 management during the term of the contract to reduce the ability of a developer to
10 manipulate the size eligibility threshold.

11 **Q. Why do you believe the Company's proposal is the most appropriate?**

12 A. The Company's proposal presented in my direct testimony established a clear and
13 concise method to stop disaggregation, however to improve the Company's
14 proposal, I have incorporated some of the other parties' proposal characteristics
15 into a revised proposal summarized later in this testimony. The Company's
16 proposal sets a five-mile limit on the distance between projects while the other
17 proposals use a one-mile criterion. We have already observed, as evidenced by
18 Cedar Creek Wind's five QF PPAs in front of the Commission for review and
19 decision, that a one-mile separation requirement does not prevent disaggregation.
20 The Company's proposal establishes that the projects cannot come on-line within
21 24 months of each other which severely limits the ability to finance or construct
22 the projects as if they were a single project. Finally, Rocky Mountain Power
23 proposes using a nameplate capacity size limit instead of a limit based on average

1 megawatts. While this is a major divergence from the current eligibility threshold,
2 it does provide a very clear size threshold on projects, eliminating future disputes
3 over project production capacity. In our revised proposal we establish 10 MW
4 nameplate capacity as the threshold because this will continue to allow
5 individuals and communities the ability to develop renewable resources, very
6 much in line with the directives of PURPA. The Company's standard QF
7 experience in Oregon demonstrates that 10 MW nameplate is a reasonable
8 threshold for published avoided cost rates while not deterring project
9 development.

10 **Q. Please summarize the ICL proposal.**

11 A. The ICL proposal summarized by Mr. Otto utilizes four criteria to determine the
12 size of a QF system comprised of more than a single electrical generator. Those
13 criteria are:

14 1. Energy Source - Uses the same energy source.

15 2. Ownership - Owned by the same person or affiliate where the affiliate
16 does not include passive investors whose sole purpose is tax credits, green
17 tags or depreciation; or control of management, operation or policies over
18 the person of owning the electrical generator.

19 3. Location - Electrical generator is located within one-mile of any other
20 electrical generator with the exception of the hydroelectric generators
21 which use the same impoundment or canal drop.

22 4. Timing - The electricity is initially delivered by each electrical generator
23 to the utility within the same 24-month period.

1 As with the Rocky Mountain Power's proposal, the size determination is
2 completed by the utility based on submitted documentation by the QF. The QF
3 must warrant and represent that its maximum size is 10 aMW and that ownership,
4 control or management will not change the size eligibility over the term of the
5 PPA. However, unlike Company's proposal, the utility has only 15 days to make
6 the determination. In the event the QF is in disagreement with the determination,
7 the QF can request a Commission review within 15 days.

8 **Q. Please explain the deficiencies of the ICL proposal.**

9 A. The major deficiency of the ICL proposal is that it does not address a number of
10 the common ownership characteristics of being a single development, including
11 an umbrella sales arrangement, shared interconnection and infrastructure, shared
12 transmission services agreement (off-system resource only), revenue sharing
13 arrangements, and common debt or equity financing, to name a few. The
14 Company also notes that the amount of time to make a determination is woefully
15 short. In the various cases where the Company had to complete due diligence on
16 the various criteria, the time to complete ranged from 30 to 45 days due to the
17 need for additional data from the QF. The Company further notes that the 10
18 aMW threshold can be subjective and provides an opportunity for disputes to
19 occur between the utility and the developer on the project's output.

20 **Q. What is contained in the RNP proposal?**

21 A. RNP's proposal summarized by Ms. Decker's testimony also has four major
22 points to determine if a project with multiple generation sources is a single QF.
23 They are:

1. Uses the same motive force as the QF.
2. Owned or controlled by the same person or affiliate where the affiliate is a person or legal entity sharing common ownership, management or control of management, operation or policies over another person or entity but the affiliate does not include passive investors whose sole purpose is tax credits, green tags or depreciation.
3. The generation source is placed into service within 12 months of the QF's on-line date.
4. Shares common interconnection, controls and infrastructure as the QF.

As with Company's proposal, the size determination is completed by the utility based on documentation submitted by the QF. In the event the QF is in disagreement with the determination, the QF can request a Commission review. The QF must warrant and represent that the project satisfies the four requirements and that ownership, control or management will not change the size eligibility over the term of the PPA.

Q. Do you see any deficiencies in the RNP proposal?

A. Yes. The RNP proposal, similar to the ICL proposal, does not address a number of important common ownership characteristics of being a single development. More importantly, the RNP proposal requires that the multiple facilities must meet all four of the conditions and be over 10 aMW in order to be deemed a single entity. A project could easily sidestep one of the conditions and all of the multiple projects are eligible for standard rates. Nor does the RNP proposal establish any minimum distance requirement; in fact, it does not even discuss the

one-mile PURPA distance requirement. Thus, the Company believes the RNP proposal is flawed and could be manipulated. As with the ICL proposal, Company notes that the 10 aMW threshold can lead to disputes over the project's size.

Q. Please **describe Staff's proposal.**

A. Staff's proposal as presented in Mr. Sterling's direct testimony is the most comprehensive of the proposals. It identifies 15 characteristics that multiple generation sources may exhibit and qualify as a single project. Many of the characteristics are similar to the other proposals but Mr. Sterling also identifies several that are not included in the Company's, RNP's or ICL's proposal including permitting multiple projects as a single entity, sharing engineering and procurement contracts, sharing common land leases. The list proposed by Mr. Sterling is very complete and his methodology for evaluation is reasonable.

Q. Do you find any deficiencies in Staff's proposal?

A. Yes. I believe the 12 month period for construction is too lenient. For example, the Company has wind QF PPAs in other states that are a single project split into two projects and constructed to come on-line 12 months apart to meet a regulatory stipulation. The projects are owned by the same entity, share common ownership traits including land lease, interconnection, and construction and procurement contracts.

Q. Does the Company have a revised disaggregation proposal?

A. Yes. After reviewing the three proposals by Staff, RNP and ICL, the Company has prepared a revised set of proposed criteria, attached hereto as Rocky Mountain Power Exhibit No. 205. A redline showing changes from my direct

1 testimony is included along with a clean version of the revised proposal. The
2 revision incorporates a number of characteristics from Staff's proposal including
3 shared common land leases, shared construction and procurement contracts, and
4 permitting of multiple projects as a single entity. Like the other proposals, the
5 Company has modified its rule to apply generally to all types of QFs, rather than
6 limiting it to wind and solar QFs. The proposal also sets the threshold limit at 10
7 MW nameplate capacity which is a key component to limiting disaggregation
8 while maintaining viability for small community developed projects.

9 **Q. Will you describe the Company's revisions to the Qualifying Facility Size**
10 **Determination Application?**

11 A. Yes. Because the revised proposal treats all QF applicants of any motive force
12 equally, the solar and wind specific application forms are replaced by a form
13 suitable for any QF applicant. Because the Company added elements of Staff's
14 proposal to its proposed rule, it added request for information about those
15 elements to the application form. The Company made additional organizational
16 changes and edits intended to make the application form shorter and easier to
17 understand. A clean version of the revised proposed Qualifying Facility Size
18 Determination Application is attached hereto as Rocky Mountain Power Exhibit
19 No. 206.

20 **Q. Does this conclude your rebuttal testimony in this proceeding?**

21 A. Yes.

Case No. GNR-E-11-01
Exhibit No. 204
Witness: Bruce W. Griswold

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Rebuttal Testimony of Bruce W. Griswold

April 2011

Proposed common characteristics between projects that indicate a single project of 10 aMW or a larger, disaggregated project	**Rocky Mountain Power**	**Commission Staff**	**ICL**	**RNP**
Shared Motive Force or fuel	√[1] All types (Rocky Mountain Power, GNR-E-11-01, Exhibit 205, page 2 of 2 to Griswold, Rebuttal Testimony)	√ All types. (IPUC, GNR-E-11-01, Exhibit 301, page 1 of 4 to Sterling Di)	√ All types. ICL, Statement of Position and Strawman Proposal, GNR-E-11-01, at 1.	√ All types. (RNP, GNR-E-11-01, Decker, Di, Attachment 1, at 1)
Common Ownership or Control	√ "Ownership by the same or affiliated entities." (*Id.*)	√ Owned or controlled by "affiliated person(s)". Includes entities but not passive investors whose ownership benefit are only tax credits, and/or green tags. (*Id.* at 2)	√ Same person or affiliate. "Owns" means holds more than 50% equity in generator. Person includes entities. Affiliate includes person who shares common control over project. "Control" power to direct operations, policies or people. (*Id.*)	√ Suggests excluding passive owners whose only benefit is obtaining tax credits and green tags. (*Id.*)
Proximate time placed in Service	√ Similar generator becomes operational within 24 months of similar project. (*Id.*)	√ Similar generator becomes operational within 12 months of an affiliated project as specified in PPA. (*Id*, at 1.)	√ Similar generator becomes operational within same 24 month period. (*Id*).	√ Similar generator becomes operational within 12 months of a similar project. (*Id.*)
Common Interconnection point	√ "Shared interconnection point, facilities and/or interconnection agreement." (*Id*)	√ Common point or interconnection facilities. (*Id.*)		√ Included under shared transmission infrastructure. (*Id.*)
Control, communications and Operation facilities	√ (*Id.*)	√ (*Id.*)		√ (*Id*)
Transmission interconnection Agreement	√ "Shared transmission agreement." (*Id.*)	√ (*Id.* at 2)		√ (*Id*)
Similar facility in same vicinity or proximity.	√ Within 5 miles. (*Id.*)	√ "Same vicinity" not defined, left to Commission determination. (*Id.*)	√ Within one mile of similar generator with same fuel. Hydro is same impoundment. (*Id.*)	√ One or five miles. (RNP, GNR-E-11-01, Decker Di, at 8).

[1] √ indicates that the party has included a particular criterion in part of their analysis of whether a project is a single QF 10aMW project or is part of a larger, disaggregated project.

Proposed common characteristics between projects that indicate a single project of 10 aMW or a larger, disaggregated project	**Rocky Mountain Power**	**Commission Staff**	**ICL**	**RNP**
Operated/maintained by same entity	√ (*Id.*)	√ (*Id.*)	√ Power to control electrical generator. (*Id*, at 1).	√ Includes staffing, personnel. (*Id.*)
Constructed by the same entity	√ Included in the size determination application. (Rocky Mountain Power, Exhibit 206, page 2 of 5 to Griswold, Rebuttal Testimony)	√ (*Id.*)		√ Shared construction contracts. (*Id.*)
Common debt/equity financing	√ (Exhibit 204, page 2 of 2).	√ (*Id.*)		√ Interdependent financing schemes may indicate a single project. (*Id.*)
Subject to common revenue sharing agreement	√ (*Id.*)	√ (*Id.*)		√ (*Id.*)
Permitting done by same entity/application	√ (*Id.*)	√ (*Id.*)		√ Siting applications completed by single entity. (*Id.*)
Engineering/procurement contract	√ (*Id.*)	√ (*Id.*)		√ Use of same equipment (*Id.*)
Common land leases	√ (*Id.*)	√ (*Id.*)		
Warrants single facility in PPA	√ (*Id.*)	√ QF Must warrant project satisfies single project requirement, that seller will not change ownership, control or management during term of PPA that would cause it to not be a single project, acknowledge that if the Commission finds not a single project, will be in default under PPA. (*Id.* at 3)		√ QF must warrant and represent that the seller will not make any changes in its ownership, control or management during the term of the PPA that would cause it not to be in compliance with the single QF requirement. (*Id.*)

Proposed Application and Administrative process to determine whether a QF project is a single 10 aMW project or part of a larger disaggregated project	**PacifiCorp**	**Staff**	**ICL**	**RNP**
Proposed Application Process	Project must file out a size determination application and provide information intended to reveal whether the project is a single project or part of a larger, disaggregated project. (*Id.*)	Project must provide the utility with any relevant information and in reasonably sufficient detail to allow the utility to make an initial determination of compliance with the single project criteria. (*Id*).	At the time the qualifying facility initiates a formal request to enter into a power purchase agreement for the published rate the qualifying facility must submit sufficient documentation to reasonably allow the purchasing utility to make an initial determination of the maximum size. The utility must make an initial size determination within 15 days based upon the submitted information. (*Id.* at 2)	Upon request, the QF will verify to the utility the ownership, management and financial structure of the QF in reasonably sufficient detail to allow the utility to make an initial determination of compliance with the ownership requirement. (RNP, GNR-E-11-01, Decker, Di, Attachment 1, at 1)
Proposed Administrative Process	Application is submitted to potential contracting utility and the utility makes a size determination within 30 days. Any disputes over the size of a project are to be resolved by the Commission. (*Id.*)	After an initial size determination, if a dispute arises, the parties may resolve the size determination before the Commission. (*Id*, at 4)	If the utility finds that the project does not satisfy the criteria needed to establish the project is a single 10 aMW project, the utility must submit a full written explanation detailing their findings and explaining how the project exceeded 10 aMW based on the criteria and the submitted information. A project may challenge the initial determination before the Commission within 15 days of receiving the initial determination. (*Id*)	Disputes over the initial size determination made by the utility are to be resolved before the Commission. (RNP, GNR-E-11-01, Decker, Di, Attachment 1, at 2)

Case No. GNR-E-11-01
Exhibit No. 205
Witness: Bruce W. Griswold

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Rebuttal Testimony of Bruce W. Griswold

April 2011

Criteria for Determining Published Avoided Cost Eligibility

(a) The total size of a combination of a small qualifying facility generating project for the purpose of determining whether that project is eligible for published avoided cost prices, must be determined according to this section. The nameplate capacity of the applicant's project must be combined with the nameplate capacity of any other wholesale generating project that:

(1) is located within five miles of any generator comprising the applicant's project;

(2) is constructed within the same 24-month period as the applicant project; and

(3) exhibits characteristics of being a developed in common with the applicant's project, including, but not limited to,

a. ownership by the same or affiliated entities,

b. an umbrella sales arrangement,

c. shared interconnection point, facilities and/or interconnection agreement,

d. shared transmission agreements,

e. common control, communication or operations facilities,

f. permitted as a single application or entity,

g. shared land leases

h. shared engineering or procurement contracts,

i. revenue sharing arrangements, and

j. common debt or equity financing.

(b) The utility shall provide forms and assistance to project applicants requesting a size determination. Upon written request of a project applicant, the utility shall provide a written size determination within 30 days of receipt of the request and of any information requested by the utility. In the case of a dispute, the Commission shall make the final size determination.

(c) An application for a power purchase agreement with published avoided cost prices is not complete without a size determination made under this rule.

(d) Any power purchase agreement including published avoided cost rates shall include a warranty from the seller that: (1) the information provided to the utility is complete and accurate as of the execution date of the power purchase agreement; and (2) that the seller will remain in compliance with the size eligibility criteria for the term of the power purchase agreement.

Criteria for Determining Published Avoided Cost Eligibility

(a) The total size of a combination of ~~wind or solar energy conversion systems for the purpose of determining whether~~ a ~~QF~~ small qualifying facility generating project for the purpose of determining whether that project is eligible for published avoided cost prices, must be determined according to this section. The nameplate capacity of ~~one wind or solar energy conversion system~~the applicant's project must be combined with the nameplate capacity of any other ~~wind or solar energy conversion system that:~~wholesale generating project that:

(1) is located within five miles of ~~the wind or solar energy conversion system;~~any generator comprising the applicant's project;

(2) is constructed within the same 24-month period as the ~~wind or solar energy conversion system~~applicant project; and

(3) exhibits characteristics of being a ~~single development~~developed in common with the applicant's project, including, but not limited to,

a. ownership ~~structure,~~ by the same or affiliated entities,

b. an umbrella sales arrangement,

c. shared interconnection~~,~~ point, facilities and/or interconnection agreement,

d. shared transmission agreements,

e. common control, communication or operations facilities,

f. permitted as a single application or entity,

g. shared land leases

h. shared engineering or procurement contracts,

i. revenue sharing arrangements, and

j. common debt or equity financing.

(b) The utility shall provide forms and assistance ~~for project developers~~ to ~~make a request for~~ project applicants requesting a size determination. Upon written request of a project ~~developer~~applicant, the utility shall provide a written size determination within 30 days of receipt of the request and of any information requested by the utility. In the case of a dispute, the Commission shall make the final size determination.

(c) An application for a power purchase agreement with published avoided cost prices ~~by a wind or solar energy conversion system~~ is not complete without a size determination made under this rule.

(d) Any power purchase agreement including published avoided cost rates shall include a warranty from the seller that: (1) the information provided to the utility is complete and accurate as of the execution date of the power purchase agreement; and (2) that the seller will remain in compliance with the size eligibility criteria for the term of the power purchase agreement.

Case No. GNR-E-11-01
Exhibit No. 206
Witness: Bruce W. Griswold

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Bruce W. Griswold

April 2011

Qualifying Facility Size Determination Application

Directions for Applicant:

This form has been developed to gather information and assist [utility] in determining the size of proposed Qualifying Facilities (QF) pursuant to Idaho Public Utilities Commission (Commission) Order No. _____. [Utility's] determination of size will determine whether a proposed QF is eligible for the avoided cost rates published by the Commission. An applicant seeking a power purchase agreement with published rates must first submit this application along with the information requested herein to [utility]. Within 30 days of receipt of this application plus any information [utility] reasonably requires, [utility] will provide applicant a written determination of the size of its QF. If applicant does not agree with the determination, it may within 30 days appeal [utility's] decision to Commission, who shall then make a final determination based upon the materials provided to [utility], [utility's] written determination, applicant's petition and [utility's] answer. If [utility] or the Commission determines that the size of the QF is less than the Commission's eligibility cap, then QF may apply for a power purchase agreement containing the Commission's published avoided cost rates. **Please note that prices set forth in any power purchase agreement or otherwise provided by [utility] during negotiations are subject to revision by Commission order and QF is not entitled to a specific avoided cost rate until the Commission has approved an executed agreement between QF and [utility].**

***Please answer the questions below, attach your answers to this form, sign the attestation at the bottom of the form, and return to*:**

[Contact information for person responsible for reviewing this form at the Utility]

A. Project Description and Location

A.1 Please provide a description of the applicant's project including: (1) generator size, make, and model, (2) number of generators, (3) location of the project (county, township), and (4) the proposed point of interconnection.

A.2 Please provide a map of the project showing:

- (a) Proposed generator locations (latitude and longitude, or other fixed location)
- (b) A USGS survey map, current aerial photograph or scale drawing showing:
  - (i) a distance scale
  - (ii) the location of each generator in the project
  - (iii) a line indicating a distance of 5 miles from the nearest project generator
  - (iv) property lines surrounding the project site
  - (v) any other wholesale power generator, in operation or in development, within 5 miles of the project.

B. Applicant Characteristics

B.1. Please provide the following information about the applicant:

(a) the name, address, telephone number, and e-mail address of applicant's representative.

(b) applicant's business entity type, its ownership (including any upstream ownership) and financial structure.

(c) the Idaho Secretary of State organizational ID number for applicant's business entity, all subordinate entities, and all wind developer entities involved with the proposed project.

B.2 Please identify any existing or planned wholesale power generator, QF or otherwise, within 5 miles of the project in which the applicant, or a principal, partner, or affiliate of the applicant, has an ownership interest or other financial interest.

B.3 Please identify any wholesale power generator, QF or otherwise, within 5 miles of the project which shares any of the following with the project: power purchase agreement, interconnection, revenues, procurement contracts, debt or equity financing.

C. Project Details

C.1 Please provide a schedule for completing the project, including dates for permitting, construction (start and end dates), and commercial operation.

C.2 Please describe the status of the project within an interconnection queue, including the transmission application queue number(s).

C.3 Please identify who will design and construct the project.

C.4 Please identify who will operate and maintain the project.

C.5 Please identify and provide contact information for the person or persons who will be the permittee for the proposed project permits, if different than the applicant.

I attest that the information provided above is accurate.

Signature: _____

Name: _____

Title: _____

Date: _____