

Avista Corp.
1411 East Mission PO Box 3727
Spokane, Washington 99220-3727
Telephone 509-489-0500
Toll Free 800-727-9170



April 26, 2011

RECEIVED
2011 APR 27 PM 1:58
IDAHO PUBLIC
UTILITIES COMMISSION

Via Overnight Mail and Email

Jean Jewell
Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 93702
Email: jean.jewell@puc.idaho.gov

**Re: Avista Corporation's Answer to Motion to Strike Portions of the Direct Testimony of Clint Kalich
IPUC Docket No. GNR-E-11-01**

Dear Ms. Jewell:

Please find enclosed for filing an original and seven copies of Avista Corporation's Answer to Motion to Strike Portions of the Direct Testimony of Clint Kalich for filing in the above-referenced docket. Please let me know if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael G. Andrea", written in a cursive style.

Michael G. Andrea
Senior Counsel

Enclosures

cc: Service List

MICHAEL G. ANDREA (ISB No. 8308)
Avista Corporation
1411 E. Mission Ave., MSC-23
Spokane, WA 99202
Telephone: (509) 495-2564
michael.andrea@avistacorp.com

RECEIVED
2011 APR 27 PM 1:59
IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Avista Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S)	
INVESTIGATION INTO)	CASE NO. GNR-E-11-01
DISAGGREGATION AND AN)	
APPROPRIATE PUBLISHED AVOIDED)	AVISTA CORPORATION'S
COST RATE ELIGIBILITY CAP)	ANSWER TO MOTION TO STRIKE
STRUCTURE FOR PURPA QUALIFYING)	PORTIONS OF THE DIRECT
FACILITIES)	TESTIMONY OF CLINT KALICH
)	
)	
)	

Pursuant to Rule 57.03 of the Idaho Public Utilities Commission's ("IPUC" or "Commission") Rules of Procedure, Avista Corporation ("Avista") submits its answer to Renewable Northwest Project's ("RNP") Motion to Strike Portions of the Direct Testimony of Clint Kalich and filed in the above-referenced proceeding, in which the Northwest and Intermountain Power Producer's Coalition ("NIPPC") joins ("Motion").

The issues set for this phase of the proceeding include the Commission's request for information and investigation of a published avoided cost rate eligibility cap structure that prevents disaggregation and includes "criteria within which small wind and solar QFs can obtain a published avoided cost rate without allowing large QFs to obtain a rate that is not an accurate reflection of a utility's avoided cost for such projects." Notice of Inquiry, Notice of Intervention Deadline, Notice of Scheduling, Notice of Technical Hearing, issued February 25, 2011

("Notice") at 3 (emphasis added). RNP and NIPPC move to strike testimony that bears directly on issues set for this proceeding—i.e., whether a published avoided cost rate eligibility cap structure can be adopted by the Commission that (1) allows QFs as large as 10 aMW to take advantage of published avoided cost rates; (2) prevents disaggregation; and (3) does not allow large QFs to obtain a rate that is not an accurate reflection of a utility's actual avoided cost for such projects. *See* Notice at 3. RNP and NIPPC generally seek to strike substantial portions of Mr. Kalich's testimony that demonstrates that the current published avoided cost rate exceeds the utility's actual avoided costs, which provides the economic incentive that is the primary driver behind developers disaggregating their projects to take advantage of those rates. Therefore, in adopting any published avoided cost rate eligibility cap structure that provides published rates to QFs as large as 10 aMW, it is important that the Commission be made aware that such high rates are the driver of disaggregation. Further, absent a modification to the published avoided cost rates, there is significant danger that raising eligibility from the present 100 kW that will allow large QFs to take advantage of published rates that do not accurately reflect the utility's actual avoided costs.

RNP and NIPPC also seek to strike testimony that demonstrates that QFs larger than 100 kW are "large" QFs and that the Commission can satisfy its stated goals of (1) providing published avoided cost rates to small QF projects, (2) preventing disaggregation, and (3) ensuring that large QFs do not obtain a rate that is not an accurate reflection of a utility's avoided cost for such projects by retaining the 100 kW published avoided cost rate eligibility cap.

The Kalich Testimony that RNP and NIPPC seek to strike is squarely within the scope of the Commission's request for information and investigation of a published avoided cost rate eligibility cap structure that provides published rates to small QFs, prevents disaggregation and

ensures that large QFs do not “obtain a rate that is not an accurate reflection of a utility’s avoided cost for such projects.” *See* Notice at 3. The Motion is without merit and, therefore, Avista respectfully requests that the Commission issue an order denying the Motion in its entirety.

I. Background

On February 25, 2011, the Commission issued the Notice in the above-captioned proceeding “seek[ing] information regarding criteria within which small wind and solar QFs can obtain a published avoided cost rate without allowing large QFs to obtain a rate that is not an accurate reflection of a utility’s avoided cost for such projects” and specifically “solicit[ing] “information and investigation of a published avoided cost rate eligibility cap structure that: (1) allows small wind and solar QFs to avail themselves of published rates for projects producing 10 aMW or less; (2) prevents large QFs from disaggregating in order to obtain a published avoided cost rate that exceeds a utility’s avoided cost.” Notice at 3. Pursuant to the Notice, direct testimony and exhibits were due on March 25, 2011. Rebuttal testimony was due on April 22, 2011. A technical hearing is scheduled in this matter for May 10, 2011.

On March 24, 2011, Avista submitted the Direct Testimony of Clint Kalich (“Kalich Direct”) for filing in this proceeding. On April 13, 2011, RNP filed its Motion seeking to strike substantial portions of the Kalich Direct on the sole ground that such portions “are outside the scope of the present phase of this proceeding[.]” Motion at 3. On April 14, 2011, NIPPC filed a motion in which, in relevant part, it joined in RNP’s Motion. The portions of the Kalich Direct that RNP and NIPPC seek to strike bear directly on the issues in this proceeding. The Motion is without merit and, therefore, should be denied in its entirety.

II. Argument

As stated above, the Commission has expressly requested “information and investigation of a published avoided cost rate eligibility cap structure that: (1) allows small wind and solar QFs to avail themselves of published rates for projects producing 10 aMW or less; (2) prevents large QFs from disaggregating in order to obtain a published avoided cost rate that exceeds a utility’s avoided cost”, and (3) that does not allow “large QFs to obtain a rate that is not an accurate reflection of a utility’s avoided cost for such projects.” Notice at 3. The portions of Mr. Kalich’s direct testimony that RNP and NIPPC seek to strike is directly responsive to the Commission’s request for information and investigation in this proceeding.

A. Testimony Regarding the Published Avoided Cost Rate to Be Used in a Published Avoided Cost Rate Eligibility Cap Structure is Within the Scope of this Phase of this Proceeding.

RNP and NIPPC generally seek to strike broad portions of Mr. Kalich’s testimony that demonstrate that: (i) the current published avoided cost rate is too high; (2) such published avoided cost rate provides the economic incentive that is driving developers to disaggregate their projects to take advantage of those rates; and (3) at a minimum, to prevent disaggregation, the published avoided cost rate to be applied in any published avoided cost rate eligibility cap structure that provides published rates to QFs as large as 10 aMW, must not exceed the utilities’ actual avoided costs. Mr. Kalich’s testimony regarding the published avoided cost rate that will be applied in any published avoided cost rate eligibility cap structure that may be adopted in this proceeding is clearly within the scope of the Commission’s request for information regarding an published avoided rate eligibility cap structure that prevents disaggregation and ensures that QFs are not able to obtain a rate that exceeds the utility’s actual avoided cost. *See* Notice at 3. This is especially true given that, as noted in the Kalich Direct, the economics associated with the

current published avoided cost rate is a fundamental driver of the disaggregation problem that the Commission is seeking to prevent in this proceeding. *See, e.g., Kalich Testimony at 6; see also Notice at 3.*

1. Page 5, Line 1 through Page 9, Line 23 of Mr. Kalich's Direct Testimony Should Not be Stricken.

RNP and NIPPC seek to strike page 5, line 1 through page 9, line 23 of the Kalich Direct on the ground that, “[t]his section of testimony argues that the current published avoided cost rates are too high for variable energy resources, from the utility perspective. Accordingly, it is beyond the scope of issues identified for consideration in this proceeding.” Motion at 3.

In this section of the Kalich Direct, Mr. Kalich testifies that the variable energy resources being constructed by QF developers are fundamentally different from a combined cycle combustion turbine (“CCCT”) and, as a result, the rate paid for such variable generation based on a surrogate avoided cost CCCT does not approximate true utility avoided costs for variable generation resources. Kalich Direct at 5:1-6:8, 9:1-9:23. Mr. Kalich further explains that published avoided cost rates that exceed the utilities’ actual avoided costs is the fundamental driver of the disaggregation problem that the Commission seeks to solve in this phase of the proceeding. Kalich Direct at 6:9-8:10. Mr. Kalich concludes that “if the Commission reestablishes a 10 aMW eligibility cap for published avoided cost rates, this mismatch between the published avoided cost rate and the utilities’ actual avoided cost for a similar resource is the threshold issue that must be addressed to solve Idaho’s PURPA issues—including disaggregation.” Kalich Direct at 8:6-8:10. Any argument that such testimony, which is on the central element of any published avoided cost rate eligibility cap structure—i.e., the published avoided cost rate to be used in that structure—is not within the scope of the Commission’s

request for information “of a published avoided cost rate eligibility cap structure” is without merit.¹

2. Page 10, Line 20 through Page 22, Line 10 of Mr. Kalich’s Direct Testimony Should Not be Stricken.

RNP seeks to strike page 10, line 20 through page 22, line 10 of the Kalich Testimony on the ground that, “[t]his section of text argues that current published avoided costs result in exorbitant profits for wind developers. Accordingly, it is beyond the scope of issues identified for consideration in this proceeding.” Motion at 3. Again, any assertion that testimony regarding a central element of any published avoided cost rate eligibility cap structure—i.e., the published avoided cost rate to be applied in such structure—is without merit. This is especially true here, where the profits developers derive from the current published avoided cost rate provides the economic incentive to disaggregate large projects into smaller QF projects.

In this portion of testimony that RNP and NIPPC seeks to strike, Mr. Kalich testifies that changing the published rate paid for QF resources is essential to preventing disaggregation. Kalich Direct at 10:20-11:23. Mr. Kalich further provides testimony regarding the history of wind development in Idaho to demonstrate that economics has been, and continues to be, the principle driver of such wind development. Kalich Direct at 12:122:10. Mr. Kalich’s testimony

¹Avista notes that the Motion sweeps into its request to strike this section of the Kalich Direct page 8, lines 11-22. This section of the Kalich Direct does not, as the Motion asserts “argue[] that the current published avoided cost rates are too high for variable energy resources, from the utility perspective.” Motion at 3. Rather, this portion of the Kalich Direct is directed at the fact that projects as large as 10 aMW have a price tag of \$60 million or more and, therefore, cannot fairly be characterized as “small” QFs for which published rates are necessary in order to simplify the contracting process. *See* Kalich Direct at 8:11-22. RNP does not provide any basis for moving to strike this portion of the Kalich Direct. To the extent the Motion can be read to suggest that this portion is beyond the scope of this proceeding (Motion at 3), such suggestion is without merit. As discussed in the Kalich Direct, applying the eligibility cap to projects as large as 10 aMW is both unnecessary and is a fundamental driver of the disaggregation problem that is at issue in this proceeding. *See, e.g.*, Kalich Direct at 8:11-22.

demonstrates that, under the current published avoided cost rate, “[a] 10 aMW wind project is being overpaid by approximately \$63 million over 20 years.” Kalich Direct at 21:19-20.

This testimony is directly responsive to the Commission’s request for information on a published avoided cost rate eligibility cap structure that both prevents disaggregation and ensures that “large QFs [are not allowed] to obtain a rate that is not an accurate reflection of a utility’s avoided cost for such projects.” See Notice at 3. Overpayment by utilities for variable resource projects as large as 10 aMW as a result of published avoided cost rates that do not accurately reflect the utility’s actual avoided costs provides a strong economic incentive, and is the primary driver, for developers to disaggregate their projects in order to take advantage of those published rates. Accordingly, if the Commission (1) adopts any published avoided cost rate eligibility cap structure that allows QFs as large as 10 aMW to take advantage of published rates and (2) hopes to both prevent disaggregation and ensure that QFs are not obtaining a rate that is not an accurate reflection of the utility’s avoided cost, the Commission must as a threshold matter ensure the published avoided cost rate that will be applied in that structure accurately reflect the utilities’ true avoided costs. See Notice at 3; *e.g.*, Kalich Direct at 8:6-10 (stating “if the Commission reestablishes a 10 aMW eligibility cap for published avoided cost rates, this mismatch between the published avoided cost rate and the utilities’ actual avoided cost for a similar resources is the threshold issue that must be addressed to solve Idaho’s PURPA issues—including disaggregation.”). RNP’s and NIPPC’s motion to strike testimony on the central threshold issue in this phase of the proceeding should be denied.

3. Page 22, Line 11 through Page 30, Line 2 of Mr. Kalich's Direct Testimony Should Not be Stricken.

RNP and NIPPC also seek to strike the Kalich Direct that appears at (i) page 22, line 11 through page 24, line 19; (ii) page 24, line 20 through page 25, line 19; and (iii) page 25, line 20 through page 30, line 2 on the grounds that, these sections argue (1) "that an IRP methodology is more appropriate", (2) "that PURPA rates have negatively impacted Avista's Customers", and (3) "that the utility's need for resources should be reflected in avoided costs." Motion at 3-4. In RNP and NIPPC's view, these sections of testimony are "beyond the scope of issues identified for consideration in this proceeding." Motion at 3-4. Such testimony is squarely within the scope of the issues set for this phase of this proceeding. The Motion to strike this testimony should be denied.

Again, the Commission has expressly requested information regarding a published avoided cost rate eligibility cap structure that prevents disaggregation and does not provide large QFs a published avoided cost rate that is not an accurate reflection of a utility's avoided cost. Notice at 3. As discussed above, any published avoided cost rate eligibility cap structure that provides published avoided cost rates to QFs as large as 10 aMW, and both attempts to prevent larger QFs from disaggregating to take advantage of those rates and ensures that such structure does not provide QFs a published avoided cost rate that does not accurately reflect the utility's actual avoided cost, must, as a threshold matter, include a published avoided cost rate that reflects the actual avoided costs of the utilities.

In these sections of the Kalich Direct, Mr. Kalich testifies about the need to modify the current SAR methodology that is used to set published avoided cost rates to ensure that the published avoided cost rates reflect actual avoided costs. Kalich Testimony at 22:11-25:19. Based in large part on this testimony, Mr. Kalich concludes that "the best means to determine

actual avoided costs in the current environment is to calculate the value of the PURPA development using the IRP Methodology.”² Kalich Direct at 24:17-19. Finally, Mr. Kalich testifies that avoided cost rates should consider utility need. Kalich Direct at 25:20-30:2. Mr. Kalich’s testimony is squarely within the scope of the Commission’s request for information regarding a published avoided cost rate eligibility cap structure that attempts to prevent disaggregation and also does not provide QFs a published avoided cost rate that does not reflect the utility’s actual avoided cost. *See* Notice at 3. The Motion is without merit and, therefore, should be denied.

B. Testimony on An Avoided Cost Rate Eligibility Cap Structure That Provides Published Avoided Cost Rates to Small QFs and Satisfies the Commission’s Stated Goals of Preventing Disaggregation and Ensuring the Avoided Cost Rate Provided to Large QFs Accurately Reflects the Utility’s Avoided Cost is Within the Scope of this Proceeding.

RNP and NIPPC seek to strike the Kalich Direct at page 34, line 10 through page 41, line 17 on the ground that, the Commission is seeking only “information on possible ways single PURPA projects of up to 10 aMW could receive published rates while preventing disaggregation of larger projects” and that the Commission “did not invite parties to reargue the theory that 100 KW is a better cap for rate eligibility purposes.” Motion at 4. Accordingly, in RNP and

² To the extent that RNP and NIPPC rely on the Commission’s bench order issued on March 23, 2011 (“Bench Order”), to support the Motion, such reliance is misplaced. The Bench Order granted a protective order prohibiting discovery on issues regarding the validity of the IRP Methodology. *See* Minutes of Decision Meeting, March 21, 2011 (Commission Smith stating that she did not believe the validity of the IRP methodology is an issue the Commission designated for hearing on May 10th). Avista acknowledges that the IRP Methodology is an accepted and approved methodology. In that light, the Kalich Direct does not in any way question the validity of the IRP methodology. Rather, in the context of testimony regarding how to ensure that QFs are not able to obtain a published avoided cost rate that does not accurately reflect the utility’s actual avoided cost (an issue expressly set for this phase of this proceeding), the Kalich Direct asserts that the IRP Methodology is a fair way to ensure comparability between the published avoided cost rate and the costs associated with resources the utilities would build and own or otherwise acquire. *See* Kalich Direct at 22:13-24:19. Such testimony is within the scope of this phase of this proceeding.

NIPPC's view, this section of testimony is "beyond the scope of issues identified for consideration in this proceeding." Motion at 3-4. RNP and NIPPC read the Notice initiating this proceeding too narrowly.

The Commission expressly requested "information and investigation of a published avoided cost rate eligibility cap structure that: (1) allows small wind and solar QFs to avail themselves of published rates for projects producing 10 aMW or less; (2) prevents large QFs from disaggregating in order to obtain a published avoided cost rate that exceeds a utility's avoided cost", and (3) that does not allow "large QFs to obtain a rate that is not an accurate reflection of a utility's avoided cost for such projects." Notice at 3. Mr. Kalich testifies that "[i]t is very unlikely that the Commission will be able to adopt a PURPA eligibility cap structure that both allows wind and solar QFs as large as 10 aMW to avail themselves to published rates and also prevent disaggregation." Kalich Direct at 10. In support of that position, Mr. Kalich cites, as an example, the fact that a 65 MW wind project was able to successfully disaggregate to take advantage of Oregon's published avoided cost rates even though Oregon had both a significantly lower eligibility cap (10 MW in Oregon as compared to 10 aMW in Idaho) and a five-mile separation requirement. Kalich Direct at 32:10-33:12. Mr. Kalich further testifies:

As the example discussed above illustrates, developers can come up with very imaginative ways to disaggregate and still comply with even very strict requirements to prevent such disaggregation. It is impossible to foresee the various ways that developers may come up with to circumvent the intent of the eligibility cap by disaggregating their projects. Additional requirements regarding ownership, sharing of equipment and interconnection facilities, and project separation rules might help, but they will be very difficult for utilities, and ultimately this Commission, to monitor and enforce. Avista is concerned that such additional requirements will lead to additional litigation that will require substantial time and resources in order to enforce the intent of the published avoided cost rate eligibility cap. More importantly, to the extent that developers are able to require utilities to pay rates above the utilities' actual avoided costs for large QF projects, the utilities' actual avoided costs for large QF projects, the utilities' customers will shoulder the burden of those costs through higher retail rates.

Kalich Direct at 33:15-34:5.

In sum, in direct response to the Commission request for information and investigation, Mr. Kalich testifies that it is virtually impossible, or at best extremely difficult and burdensome, to adopt a published avoided cost rate eligibility cap structure that provides published rates for projects as large as 10 aMW and also both prevent large QFs from disaggregating and prevent large QFs from obtaining a published avoided cost rate that does not reflect the utility's actual avoided cost. *See, e.g.*, Kalich Direct at 10:1-19, 33:15-34:5; Notice at 3. A fundamental reason why such a structure is unlikely to be successful is the incorrect premise that wind and solar projects as large as 10 aMW are "small." Mr. Kalich's testimony demonstrates that such projects cannot fairly be characterized as "small" such that it is necessary to provide such projects published avoided cost rates. Kalich Direct at 35:5-37:2 (discussing the costs of developing various resources and testifying that "10 aMW wind or solar projects are *not* small QFs." (Emphasis in original.)). With that understanding, Mr. Kalich offers an alternative approach—i.e., retaining the 100 kW eligibility cap—that can satisfy the Commission's stated goals of (1) providing published avoided cost rates to small QFs, (2) preventing disaggregation, and (3) ensuring that large QFs are not allowed to obtain a rate that is not an accurate reflection of a utility's avoided cost for such projects. *See* Notice at 3. This testimony is within the scope of this proceeding and, therefore, the Motion should be denied.

C. Exhibit 101 to the Kalich Direct Should Not Be Stricken

Finally, RNP and NIPPC seek to strike Exhibit 101 to the Kalich Direct. In RNP and NIPPC's view, "[t]he generation patterns of [a photovoltaic solar facility] are irrelevant to the issues identified in the Notice, and accordingly this exhibit is beyond the scope of issues

identified for consideration in this proceeding. Motion at 4. RNP and NIPPC's request to strike Exhibit 101 is without merit and should be denied.

As discussed more fully above, and in the Kalich Direct, the published avoided cost rate to be applied in any published avoided cost rate eligibility cap structure is very much at issue in this proceeding. *See* Notice at 3 (expressly seeking information and investigation on criteria to ensure that QFs do not receive a rate that does not reflect the utility's actual avoided cost). Mr. Kalich explains that the issue with the current SAR methodology for setting those rates is that variable energy generating resources, including solar resources, do not have the same characteristics and attributes as the current combined cycle combustion turbine surrogate avoided cost resource that is currently used to establish the published avoided cost rate. *E.g.*, Kalich Direct at 5:1-6:8, 10:22-11:6, 22:13-23:5. Accordingly, the characteristics of solar resources is relevant to, and therefore within the scope of, this proceeding. The Motion to strike Exhibit 101 should be denied.

III. Conclusion

As discussed herein, the portions of the Kalich Direct that RNP and NIPPC seek to strike are well within the scope of the Commission's request for information and investigation of a published avoided cost rate eligibility cap structure that prevents disaggregation and includes "criteria within which small wind and solar QFs can obtain a published avoided cost rate without allowing large QFs to obtain a rate that is not an accurate reflection of a utility's avoided cost for such projects." Notice at 3. Accordingly, Avista respectfully requests that the Commission issue an order denying the Motion in its entirety.

Respectfully submitted by,

AVISTA CORPORATION

A handwritten signature in black ink, appearing to read "M. Andrea", written over a horizontal line.

Michael G. Andrea
Attorney for Avista Corporation

Dated: April 26, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of April 2011, true and correct copies of
AVISTA CORPORATION'S ANSWER TO MOTION TO STRIKE PORTIONS OF THE
DIRECT TESTIMONY OF CLINT KALICH were delivered to the following persons via
Email (unless otherwise indicated).

Jean Jewell
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702
Email: jean.jewell@puc.idaho.gov
(via Email and Overnight Mail)

Donald L. Howell, II
Kris Sassar
Deputy Attorneys General
Idaho Public Utilities Commission
472 W. Washington St.
Boise, ID 83702
Email: don.howell@puc.idaho.gov
kris.sassar@puc.idaho.gov

Dean J. Miller, Esq.
McDevitt, & Miller, LLP
PO Box 2564
Boise, ID 83701-2564
joe@mcdevitt-miller.com

Peter Richardson
Gregory M. Adams
Richardson & O'Leary
515 N. 27th St.
PO Box 7218 Boise, ID 83702
Email: peter@richardsonandoleary.com
greg@richardsonandoleary.com

Daniel E. Solander
Senior Counsel
Rocky Mountain Power
201 S. Main Street, Suite 2300
Salt Lake City, UT 84111
Email: Daniel.solander@pacificcorp.com

Magan Walseth Decker
Senior Staff Counsel
Renewable Northwest Project
917 SW Oak St., Suite 303
Portland, OR 97205
Email: megan@rnp.org

Donovan E. Walker
Lisa Nordstrom
Idaho Power Company
PO Box 70
Boise, ID 83707-0070
Email: dwalker@idahopower.com
lnordstrom@idahopower.com

R. Greg Ferney
Mimura Law Offices, PLLC
2176 E. Franklin Rd., Suite 120
Meridian, ID 83642
Email: greg@mimuralaw.com

Ted S. Sorenson, P.E.
Sorenson Engineering, Inc.
5203 South 11th East
Idaho Falls, ID 83404
Email: ted@tsorenson.net

Robert D. Kahn
Executive Director
Northwest and Intermountain Power
Producers Coalition
1117 Minor Ave., Suite 300
Seattle, WA 9810
Email: rkahn@nippc.org

Glenn Ikemoto
Margaret Ruger
Idaho Windfarms, LLC
672 Blair Ave.
Piedmont, CA 94611
E-mail: glenni@envisionwind.com
Margaret@envisionwind.com

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

Shelley M. Davis
Barker Rosholt & Simpson, LLP
1010 W. Jefferson St., Ste. 102
P.O. Box 2139
Boise, ID 83701-2139
Email: smd@idahowaters.com

Bill Piske, Manager
Interconnect Solar Development, LLC
1303 E. Carter
Boise, ID 83706
Email: billpiske@cableone.net

Paul Martin
Intermountain Wind, LLC
PO Box 353
Boulder, CO
Email:
paulmartin@intermountainwind.com

Bill Brown, Chair
Board of Commissioners of Adams County,
Idaho
PO Box 48
Council, ID 83612
Email: bdbrown@frontiernet.net

Ronald L. Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise ID, 83702
Email: ron@williamsbradbury.com

Scott Montgomery
President, Cedar Creek Wind, LLC
668 Rockwood Drive
North Salt Lake, Uta 84054
Email: scott@westernenergy.us

Dana Zentz
VP, Summit Power Group, Inc.
2006 E. Westminster
Spokane, WA 99223
Email: dzentz@summitpower.com

Wade Thomas
General Counsel, Dynamis Energy
776 E. Riverside Drive, Suite 15
Eagle, ID 83616
Email: wthomas@dynamisenerg.com

James Carkulis
Managing Member
EXERGY DEVELOPMENT GROUP OF
IDAHO, LLC
802 West Banock Street, Ste. 1200
Boise, Idaho 83702
Email: jcarkulis@exergydevelopment.com

Robert A. Paul
Grand View Solar II
15960 Vista Circle
Desert Hot Springs, CA
Email: robertapaul@gmail.com

John R. Lowe
Consultant to Renewable Energy
Coalition
12050 SW Tremont Street
Portland, OR 97225
Email: jravenesanmarcos@yahoo.com

Don Sturtevant
Energy Director
J. R. Simplot Company
ONE CAPITAL CENTER
999 Main Street, P.O. Box 27
Boise, Idaho 83707-0027
Email: don.sturtevant@simplot.com

Twin Falls Canal Company
c/o Brian Olmstead, General Manager
P.O. Box 326
Twin Falls, Idaho 83303-0326
Email: olmstead@tfcanal.com

North Side Canal Company
c/o Ted Diehl, General Manager
921 N. Lincoln St.
Jerome, Idaho 83338
Email: nscanal@cableone.net

Ken Kaufmann
Lovinger Kaufmann, LLP
825 NE Multnomah, Suite 925
Portland, OR 97232
Email: Kaufmann@lklaw.com

MJ Humphries
Blue Ribbon Energy LLC
4515 S. Ammon Road
Ammon, ID 83406
Email: blueribbonenergy@gmail.com

Arron F. Jepson
Blue ribbon Energy LLC
10660 South 540 East
Sandy, UT 84070
Email: arronesq@aol.com

Greg Seifert
Kurt Meyers
Idaho National Laboratory
Conventional Renewable Energy Group
2525 Fremont Ave.
Idaho Falls, ID 83415-3810
Email: gary.seifert@inl.gov
Kurt.myers@inl.gov

Benjamin J. Otto
Idaho Conservation League
710 N. 6th St.
P.O. Box 844
Boise, Idaho 83702
Ph: (208) 345-6933 x 12
Fax: (208) 344-0344
Email: botto@idahoconservation.org

Ken Miller
Clean Energy Program Director
Snake River Alliance
Box 1731
Boise, 10 83701
Email: kmiller@stakeriveralliance.org

A handwritten signature in black ink, appearing to read "Michael G. Andrea", written over a horizontal line.

Michael G. Andrea