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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Intermountain Wind LLC

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**

Case No. GNR-E-11-01

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

DIRECT TESTIMONY OF PAUL MARTIN

1 Q. PLEASE STATE YOUR NAME AND BUSINESS AFFILIATION.

2 A. My name is Paul Martin. I am a member of Intermountain Wind LLC which is
3 the developer of a wind energy project located in Bonneville County Idaho,
4 known as the Black Canyon Project.

5 Q. PLEASE EXPLAIN YOUR INTEREST IN THIS PROCEEDING.

6

7 A. As I will explain, the Black Canyon Project is a “true PURPA” project, not part of
8 a larger project and should not be subject to a reduction in the eligibility cap for
9 published avoided cost rates.

10 Q. PLEASE DESCRIBE THE BLACK CANYON PROJECT.

11 A. Members of my family own agricultural land in Bonneville County.
12 Commencing in 2006 we began work to develop a 10 aMw project on the
13 property and for that purpose created a limited liability company, Black Canyon
14 LLC, with is a Self Certified Qualifying Facility.

15 Q. PLEASE DESCRIBE THE PROGRESS YOU HAVE MADE TOWARD
16 CONSTRUCTION OF THE PROJECT.

17 A. Wind data has been collected onsite since summer 2007. Bonneville County has
18 approved conditional use permits for the project and an Interconnection
19 Agreement has been executed with PacifiCorp Transmission Services.

20 Q. PLEASE DESCRIBE THE STATUS OF NEGOTIATIONS FOR A PURCHASE
21 POWER CONTRACT.

22 A. Intermountain has been working with PacifiCorp regarding a PPA for several
23 years but has not moved forward with execution until financing was secured. This
24 was due to the significant security deposits that PacifiCorp required in order to

1 move forward, inherently discouraging small developers such as Intermountain
2 while making PURPA contracts only available to large, well funded corporations.
3 Just as Intermountain was succeeding in securing the financing to move forward
4 with these deposits, the Joint Petition in Case No. GNR-E-10-4 was filed,
5 threatening the projects ability to move forward.

6 Q. DO YOU OR ANY MEMBER OF THE MARTIN FAMILY OR RELATED
7 LIMITED LIABILITY COMPANIES HAVE ANY OWNERSHIP INTEREST,
8 OF ANY KIND, IN ANY WIND GENERATION PROJECTS LOCATED
9 WITHIN FIVE MILES OF THE BLACK CANYON PROJECT?

10 A. No.

11 Q. WOULD INTENDED FINANCING ARRANGEMENTS FOR BLACK
12 CANYON LLC RELATE SOLELY TO BLACK CANYON?

13 A. Yes.

14 Q. WHEN BLACK CANYON APPLIED FOR A CONDITIONAL USE PERMIT
15 FROM BONNEVILLE COUNTY, WERE ANY OTHER PROJECTS
16 INCLUDED IN THE APPLICATION?

17 A. No.

18 Q. WOULD BLACK CANYON SHARE EXPENSE AND REVENUE WITH ANY
19 OTHER WIND PROJECT?

20 A. No.

21 Q. DOES BLACK CANYON HAVE ANY SHARED PERSONNEL WITH ANY
22 OTHER WIND PROJECT?

23 A. No.

1 Q. DOES THAT COMPLETE YOUR TESTIMONY?

2 A. Yes it does.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of March, 2011, I caused to be served, via the method(s) indicated below, true and correct copies of **DIRECT TESTIMONY OF PAUL MARTIN**, upon:

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