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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for J. R. Simplot Company and
Clearwater Paper Corporation.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	CASE NO. GNR-E-11-03
COMMISSION'S REVIEW OF PURPA QF)	REPORT BY THE J. R. SIMPLOT
CONTRACT PROVISIONS INCLUDING)	COMPANY AND CLEARWATER
THE SURROGATE AVOIDED)	PAPER CORPORATION ON PURPA
RESOURCE (SAR) ANN INTEGRATED)	CONTRACTING PROCEDURES
RESOURCE PLANNING (IRP))	
METHODOLOGIES FOR CALCULATING)	
<u>AVOIDED COST RATES</u>)	

Pursuant to Order No. 32697 issued in the above captioned docket by the Idaho Public Utilities Commission ("Commission"), the J. R. Simplot Company and Clearwater Paper Corporation by and through their attorneys of record, Richardson Adams, PLLC, hereby lodges its Report on PURPA Contracting Procedures.

REPORT

In Order No. 32697, the Commission directed the parties to, "participate in workshops with one another to begin to form a structure for fair and reasonable contracting procedures and rules. We expect the parties to submit to this Commission no later than December 13, 2013, a proposal for approval of such terms." In the intervening year, the parties held two workshops. Although much progress has been made, the parties have not yet arrived at a consensus as to the appropriate contracting procedures and rules.

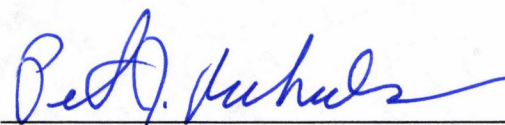
Simplot and Clearwater believe the Commission's findings in Order No. 32697 are still compelling in that:

[S]uch procedures and rules would be beneficial to both the utilities and the QFs. We find that a fair and consistent set of rules for the utilities and QFs would reduce confusion and provide more certainty regarding the expectations of all contracting parties. We are optimistic that such rules might also reduce the number of complaints filed with this Commission because of disputes regarding contract terms.

The Commission's findings relative to the importance of establishing a consistent set of procedures and rules for the utilities and QFs are still important (and achievable) goals. Simplot and Clearwater therefore respectfully request the Commission order the parties to continue their efforts by establishing additional workshops dates and hearings (if necessary) to resolve the outstanding issues.

DATED this 13th day of December, 2013.

RICHARDSON ADAMS PLLC

By: 
Peter J. Richardson, ISB #3195
Attorneys for the J. R. Simplot
Company and Clearwater Paper
Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th day of December, 2013, a true and correct copy of the within and foregoing REPORT BY THE J. R. SIMPLOT COMPANY AND CLEARWATER PAPER CORPORATION was served via electronic mail to:

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A handwritten signature in blue ink, appearing to read "Peter J. Richards". The signature is fluid and cursive, with a long horizontal stroke at the end.