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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE	)	CASE NO. GNR-E-11-03
COMMISSION'S REVIEW OF PURPA	)	
QF CONTRACT PROVISIONS	)	OPPOSITION TO IDAHO POWER'S
INCLUDING THE SURROGATE	)	MOTION FOR TEMPORARY STAY
AVOIDED RESOURCE (SAR) AND	)	OF ITS OBLIGATION TO ENTER
INTEGRATED RESOURCE PLANNING	)	INTO NEW POWER PURCHASE
(IRP) METHODOLOGIES FOR	)	AGREEMENTS WITH QUALIFYING
CALULATING PUBLISHED AVOIDED	)	FACILITES
COST RATES.	)	

The Idaho Conservation League opposes Idaho Power's motion. While the Company claims their prefiled testimony and documents filed to support this motion "inarguably makes a prima facie showing," in reality this testimony is just a one-sided view of the facts applicable to this case.

Motion at 3. The Commission should allow other parties to contest these assertions before deciding if any of them are indeed incontrovertible facts.

Further, the Company's claim they expect a rush of developers seeking new contracts is just that, a claim not a fact. The Company's position on this issue in this case should be compared to how the Company treats potential PURPA projects during the Integrated Resource Planning process. In the IRP the Company states they "cannot accurately predict the level of future PURPA development" so they only consider those projects with signed contracts. 2011 IRP at 33. In support of the current motion, Idaho Power establishes a new standard for the likelihood of PURPA development, those projects that move "beyond just a phone call and onto more serious inquiries within the last six months." Allphin Declaration at 2. The Commission

should reject this self-serving change in standards, particularly since the Company does not define the “more serious inquiries” that leads them to believe every potential QF will come to fruition.

In order to make an informed decision about the facts supporting this motion ICL urges the Commission to provide other parties a real opportunity to respond. Two days time to deal with the variety of factual claims made by the Company is simply insufficient. While ICL does not have a specific proposal on further proceedings on this motion, we do hereby reserve our right to be heard.

WHEREFORE, ICL respectfully requests the Commission deny Idaho Power’s motion.

DATED this 14th day March of 2012.

Respectfully submitted,



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Benjamin J. Otto  
Idaho Conservation League