

1. Rocky Mountain Power believes and supports Idaho Power's contentions set forth in its Motion that: (1) the evidence set forth in this case and in previous proceedings establishes prima facie proof that Idaho Power's avoided cost rates are not accurate; (2) that without adequate interim relief Idaho Power and its customers will suffer immediate and substantial harm; (3) that the balance of harms favors granting immediate relief; and (4) that good cause exists to grant immediate relief on an interim basis.

2. Rocky Mountain Power does not believe that all of Idaho Power's concerns and contentions apply equally to Rocky Mountain Power. The Company believes that its Integrated Resource Planning ("IRP") methodology as set forth in this Case is correct and defensible.

3. Rocky Mountain Power is concerned that if Idaho Power is granted a stay of its obligation to enter into power purchase agreements with qualifying facilities without a corresponding stay in Rocky Mountain Power's obligation that there could be adverse effects on Rocky Mountain Power and its customers.

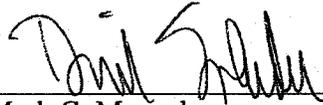
4. Rocky Mountain Power believes that if the scenario described in paragraph 3, *supra*, occurred, it is likely to lead to the situation described on page 3 of Idaho Power's Motion in which Idaho Power posited that a delay in granting the stay would lead to a flood of QF applications from developers seeking to lock in 20 year pricing. If the stay were granted only to Idaho Power, Rocky Mountain Power believes that it likewise would be inundated by a flood of applications from developers seeking to lock in 20 year pricing with Rocky Mountain Power because the same opportunity with Idaho Power would no longer be available.

5. Accordingly, Rocky Mountain Power joins in Idaho Power's Motion, and respectfully requests that, if granted, the same suspension of the obligation to enter into power purchase agreements be extended to Rocky Mountain Power.

WHEREFORE, Rocky Mountain Power joins in Idaho Power's Motion, and respectfully requests it be granted the same relief as Idaho Power.

DATED this 15th day of March, 2012.

ROCKY MOUNTAIN POWER



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of March, 2012, I caused to be served, via E-mail, a true and correct copy of Rocky Mountain Power's Response to Idaho Power's Motion for Temporary Stay in Case No. GNR-E-11-03 to the following:

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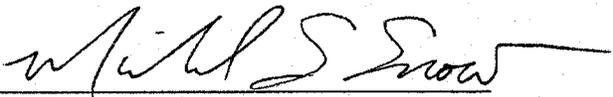
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