

# Williams · Bradbury

A T T O R N E Y S A T L A W

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IDAHO PUBLIC  
UTILITIES COMMISSION

March 25, 2013

Ms. Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

Re: GNR-E-11-03

Dear Ms. Jewell:

Please find enclosed an original and seven copies of Reconsideration Comments of the Renewable Energy Coalition for filing in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,

  
Ronald L. Williams

RLW/jr  
Enclosures

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for Renewable Energy Coalition

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE COMMISSION'S )  
REVIEW OF PURPA QF CONTRACT )  
PROVISIONS INCLUDING THE )  
SURROGATE AVOIDED RESOURCE (SAR) )  
AND INTEGRATED RESOURCE )  
PLANNING (IRP) METHODOLOGIES FOR )  
CALCULATING AVOIDED COST RATES )

Case No. GNR-E-11-03

RECONSIDERATION COMMENTS  
OF THE RENEWABLE ENERGY  
COALITION

COMES NOW the Renewable Energy Coalition ("REC"), by and through its counsel of record, Ronald L. Williams of Williams Bradbury, P.C., and provides these comments.

A. Definition of Canal Drop. REC provided previous comments as to what it considers a more appropriate definition of a canal drop project. Those comments, and the affidavit of John Lowe, are adopted herein and made a part of these Comments.

While other commenters disagreed with REC's proposed definition, the point REC was attempting to make is that justification for the higher rate should be based on the correlation between the generation delivered and the utility's system peak month or months, and not the physical features of the water delivery system. For Idaho Power, this correlation may be appropriately tied to the irrigation season in southern Idaho and the peak month of July. Conversely, eligibility for the canal drop avoided cost rate should not be left for the utility to

determine in the first instance, with the QF forced to negotiate on a case-by-cases basis, as recommended by Idaho Power.

It also seems that this debate has almost exclusively focused on Idaho Power and its July system peak. PacifiCorp, with numerous small hydro QFs operating within its Idaho service territory, appears to have a much different system peak than Idaho Power, as evidenced by its December seasonality adjustment being significantly higher than any other month. Yet, it also appears that PacifiCorp's canal drop avoided cost prices have been significantly influenced by Idaho Power's July system peak. It is therefore important to confirm that the irrigation and non-irrigation related hydro avoided cost rate schedules established for PacifiCorp correctly take into PacifiCorp's system peak[s] that may be different than Idaho Power's.

B. Capacity Factor of Canal Drop Projects: REC has reviewed the Comments of North Side Canal Company, Twin Falls Canal Company, Big Wood Canal Company, and American Falls Reservoir District No. 2 (the "Canal Companies"), concurs in Comments of the Canal Companies and adopts them as its own Comments with respect to the capacity factor for projects ultimately determined to be eligible as canal drop projects.

C. Capacity Factors and Contract Seasonality Adjustments: Some REC members have recently requested and received from Idaho investor owned utilities draft power purchase agreements (PPAs) for hydroelectric and/or canal drop QF projects, or have requested avoided cost information regarding the same. Those draft PPAs or rate information continue to make seasonality adjustments previously approved by the Commission and applied to the generic SAR calculated standard avoided cost rate.

Such prior adjustments were necessary and appropriate to account for seasonal differences in capacity and energy values, when there was only one standard avoided cost rate

available to the many different types of QF's. However, to continue to apply the same seasonality adjustment to, for example, a canal drop project that has already had its capacity value and eligibility to canal drop avoided cost prices established based on the utility's system peak month or months, appears to be redundant and inappropriate. Clarification on this point would be helpful to REC members currently discussing or contemplating renewal contracts with utilities. As stated before, it is REC's goal in these proceedings to minimize areas of ambiguity and future disagreement in the PPA negotiating process.

RESPECTFULLY SUBMITTED this 25 day of March, 2013.

WILLIAMS BRADBURY, P.C.

A handwritten signature in cursive script, appearing to read "Ronald L. Williams".

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Ronald L. Williams  
Attorney for the Renewable Energy Coalition

**CERTIFICATE OF DELIVERY**

I HEREBY CERTIFY that on this 25th day of March, 2013, I caused to be served a true and correct copy of the Reconsideration Comments of the Renewable Energy Coalition upon the following individuals in the manner indicated below:

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