

✓ Ben Ask
sent 8/21/05

✓ To A.U.

✓ To Comm
: H

29 Aug 2005

Buhl, Idaho

To the Idaho Public Utilities Commission
Boise, Ida

Dear Sirs,

In regards to The I.P.U.C. decision on
Case No. IPC-E-05-22 order no 29851, I
submit that the I.P.U.C. is not acting in
the best interest of the citizens of Idaho
in declaring a "Temporary Suspension";
thus discouraging citizens that are
planning, implementing or installing
a wind powered generation facility.

Your order does not encourage
utilizing renewable resources &
producing much needed energy.

I hereby petition that the I.P.U.C.
reconsider their decision, allowing
citizens to pursue their plans to
develop wind powered generation.

Sincerely

E. Wade Drigley

20010 Hwy 30

Buhl, Ida 83316

✓ Gen. Ake
sent 8/31/05

✓ To A.V.

✓ To Commis.
; H

August 30, 2005

Schwendiman Wind LLC
9633 East Highway 33
Newdale, Idaho 83436

IPC-E05-22.

Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83702
FAX: 208-334-3762

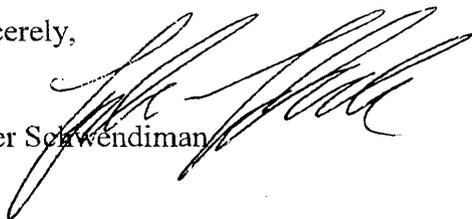
Dear Commissioners,

This letter is to voice our opinion that Windland Inc.'s request for a Stay and subsequent Reconsideration Petition on your order number 29839 are both inappropriate and presumptuous. We strongly support your decision to preserve at least a few projects as you grant Idaho Power's request for a moratorium on new projects and even more so when this is extended across Idaho. We also strongly feel that such a decision was well within your authority and was very appropriate. That decision is of course crucial to our project and we appreciate the opportunity to follow through with all of the commitments we've made and the investment we have in this project to date.

We have worked long and hard to get our project to the point we are now ready to dig holes and pour concrete. Our turbines are scheduled for delivery and our contract is poised for approval. Pacifcorp is ready to start construction on their part of the project also. We may not be done in 2005 like we hoped, but we'll be under construction next month and will be done in the first quarter of next year.

We feel that our project is exactly what PURPA was designed for and feel that we are perfectly in line with the IPUC rulings and orders to date. Our project has dramatically evolved into an excellent generation resource and will be significant in this area.

Sincerely,



Tyler Schwendiman

RECEIVED
FILED
2005 AUG 31 AM 8:10
IDAHO PUBLIC
UTILITIES COMMISSION

✓ Ack. 8/31/05
✓ To A.V.
✓ To Comm. ; H

Schroeder Wind Farm Development Project

Mark Schroeder
Schroeder Wind Farm
374 East 5400 North
Hagerman, Idaho 83332

IPUC-05-22

RECEIVED
FILED
2005 AUG 31 AM 8:10
IDAHO PUBLIC
UTILITIES COMMISSION

August 30, 2005

Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RE: Response to Windland, Inc. Petition for Reconsideration and Motion to Stay on IPUC

Dear Commissioners:

This letter is to thank you for your consideration for grandfathering status of projects already committed to development in Order 29839 which limits PURPA project sizes. My project is the result of long, tedious, and expensive efforts to build a wind project against what I felt were great odds.

I am simply an Idaho farmer who became enamored with wind many years ago. I put up the first anemometer in the Bell Rapids area and would already have a project built if I had been willing to simply sell the rights instead of holding out to be a true development partner in the creation of something meaningful.

The following was taken from the IPUC website, Order 29838:

Accordingly, this Commission finds it reasonable to establish the following criteria to determine the eligibility of PURPA qualifying wind generating facilities for contracts at the ORDER NO. 29839 published avoided cost rates. For purposes of determining eligibility we find it reasonable to use the date of the Commission's Notice in this case, i.e., July 1, 2005. For those QF projects in the negotiation queue on that date, the criteria that we will look at to determine project eligibility are: (1) submittal of a signed power purchase agreement to the utility, or (2) submittal to the utility of a completed Application for Interconnection Study and payment of fee. In addition to a finding of existence of one or both of the preceding threshold criteria, the QF must also be able to demonstrate other indicia of substantial progress and project maturity, e.g., (1) a wind study demonstrating a viable site for the project, (2) a signed contract for wind turbines, (3) arranged financing for the project, and/or (4) related progress on the facility permitting and licensing path.

Schroeder Wind Farm Development Project

I clearly qualify for the grandfathering status as granted in Order 29839 and thus have a lot to lose if that is not preserved.

(1) submittal of a signed power purchase agreement to the utility, or (2) submittal to the utility of a completed Application for Interconnection Study and payment of fee.

I submitted my request for interconnection early in June this year.

In addition to a finding of existence of one or both of the preceding threshold criteria, the QF must also be able to demonstrate other indicia of substantial progress and project maturity, e.g. , (1) a wind study demonstrating a viable site for the project...

I have done extensive wind studies myself and as part of the Bell Rapids Irrigation District over several years.

In addition to meeting the criteria set forth in your order, I have made the following progress on my project. I hired Brian Jackson with Renaissance Engineering in May of 2005 to get my project back on track. By June he had connected me with turbines and we had filed our interconnection request. Since then I have signed agreements with developers who have turbines available both in 2005 and 2006. All I need now is a power-purchase agreement from Idaho Power and I will be ready to build my project.

After over 4 years of work all of the pieces of my project's puzzle finally came together in June. Then Idaho Power muddied up the waters with their moratorium request. This year has been a roller coaster ride, what with selling my Bell Rapids water rights and all of the questions about my wind project possibilities. I hope that we can finally put these questions to rest and I can get my project built.

I am including a copy of a letter that I sent to Mr. Allphin at Idaho Power requesting that they prepare a draft Power Purchase Agreement which I can sign. I am also including a letter from Mr. Jackson at Renaissance Engineering which describes the wind analysis done on my property.

Given all of the time, effort and money that I have put into this wind project, I am very happy that your commission has established grandfathering rules which will keep my project alive.

Schroeder Wind Farm Development Project

Again, I respectfully ask ~~that~~ you maintain the grandfathering position you included in the Order No. 29839. I feel it is the minimum which at least lets the existing projects like mine which have so much work invested, proceed with development.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Schroeder', written in a cursive style.

Mark Schroeder

Mark Schroeder
Schroeder Wind Farm
374 East 5400 North
Hagerman, Idaho 83332

August 15, 2005

Idaho Power Company
PO BOX 70
Boise, Idaho 83707
Attn: Randy Allphin

RE: Wind Farm Power Purchase Agreement

Dear Mr. Allphin;

This letter is to document my position and situation regarding the grandfathering status under the IPUC Order 29839 which lists the reasonable requirements to grant my project a Power Purchase Agreement.

I have been trying to get a wind farm on my property since 2001 and was finally making progress this spring to the point where I have investment grade data on my specific property and nearby long term reference data. I have been negotiating with someone who has turbines and money to put the project together. I have been trying to get the interconnection study done after applying this spring.

I have invested thousands of dollars personally and as part of Bell Rapids Mutual Irrigation Company just in wind data collection and analysis alone over the past 4-5 years. I have had two anemometer data collection systems, one on a grain structure and the other a complete 50m data tower. Also, I am part owner of the Bell Rapids anemometers and thus have another 50m tower as well as four smaller 20m type systems across the plateau property which I can correlate my own data to.

I was part of the case before the commission in September of 2003 when Idaho Power prevailed in getting a forecasting requirement and performance band attached to their wind project contracts. I could not finance my project under such terms with investors I was working with at that time. Nevertheless, I kept collecting data, hoping to find some way to develop my project. After my older anemometer blew down in January of 2004, I had a new 50m anemometer installed at my site at considerable expense and in Spring of 2005 had a full year of data on that unit. I paid Renaissance Engineering & Design on 5/11/2005 to analyze my data and help me submit an interconnection request. That interconnection document states by the way that "Upon receipt" of those items, Idaho Power Company would notify me "in writing of the applicable contract application date and begin the process of drafting the appropriate energy sales agreement" for my review. Of course, I never did receive a draft energy sales agreement. Brian Jackson returned from the May wind conference in Denver with sad news about the availability of turbines in general, but good news in connecting me to someone with turbine possibilities and

several options. Also, despite obvious distaste for the terms of the Idaho Power contract, some investors were clearly willing to take the chance and sign up for projects under those terms. Finally I felt I had a chance to make this real, right on the heels of selling the water rights and turning my irrigated land into dry-land farming. A wind project couldn't come at a better time for me.

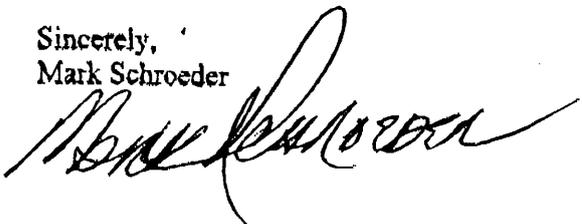
When I heard that Idaho Power had requested a moratorium on signing PURPA contracts for wind projects, I thought that was a vicious rumor even beyond truth. When I found that it was indeed true, I didn't even file to be an intervener in the case after the last one I was in at the Commission. However, I do distinctly qualify for the grandfathering status granted in the written documentation from the Commissioners.

In particular, the two key elements of my project are that: (1) I submitted my request for interconnection early in May this year and (2) I have done extensive wind studies over several years. I have been in contact with developers with turbines even having the possibility of installing 2005 installations with GE turbines or perhaps even Clipper Turbines in the spring of 2006. The fact is, I was in the midst of such discussions, and the emphatic need for a signed power purchase agreement the very week of June 13th while waiting for the results of my interconnection study and then the following week was told that the whole process was in turmoil and I would have to wait until the commission came out with their order in July. As for the other points made by the commission, I certainly was in contact with people who had both money and turbines, but just as certainly could not sign contracts without a Power Purchase Agreement in hand. At the point of creating a draft PPA, I was informed I could file a QF "Self Certification" form with FERC which I can do this week if it is recommended.

Furthermore, I own 1,920 deeded acres on the Bell Rapids Plateau and am part of the 20,000 acres of farm land that has sold the water rights and shall quit the irrigated farming forever. This project has more than enough room and is adjacent to private and county access roads. Site access and control is simply not an issue. Obviously with the other wind projects happening in the Bell Rapids area, the potential for my project stands out as far as wind resource like the other projects currently in place or proposed nearby. As far as permitting is concerned, I will follow through with the detail and tasks required, however, to date the county has consistently approved each proposed wind project application in this area.

Please consider this request in the most serious manner and prepare the draft PPA for my review and approval according to the Commission's directives. This will be an excellent project as it comes together. I was looking at GE turbines when I started this year and found access to more than enough units actually with 100m towers which would be very good since my site has excellent wind shear. Instead, I have become aware of turbines and financing available to use the Clipper Liberty 2.5MW turbines for early to mid 2006 construction. That is a simple installation of four turbines on my property at the 10MW level. It may be possible to pursue up to 20MW nameplate in total. I am prepared to proceed with haste and sign agreements with developers if I can just wrap up the Power Purchase Agreement.

Sincerely,
Mark Schroeder



ENCL. - NIND MEMO

RENAISSANCE ENGINEERING & DESIGN PLLC

"Virtutem, Formam, Decorem" (Merit, Beauty, Honor)

August 15, 2005

Mark Schroeder
Schroeder Wind Farm
374 East 5400 North
Hagerman, Idaho 83332

Wind Analysis Summary Memo

Dear Mark,

This memo is intended to summarize a portion of the data analysis work which has been done to date on your project in support of your letter to Idaho Power indicating "substantial progress" and "project maturity" per the Commission's language.

First I would like to congratulate you on such diligence and persistently working toward a working project. I have been analyzing data at Bell Rapids since the first anemometer I installed several years ago and the subsequent group of three more including the 50m reference anemometer on the plateau directly west of the Fossil Gulch Wind Park.

Note that for this report I have included a portion of the analysis work done for you that compares the 50m anemometers from your site to that reference unit. From detailed analysis we know that the 50m location is perhaps a better site than the original 20m location installed several years ago and that most of that data set is actually public information. Note that Chart 1 shows the continuous daily wind patterns through part of the winter of 2003-2004 over more than 25,000 data points. The dates were taken off the data to prevent public disclosure of perhaps strategically sensitive information. The key element to notice is a very high visual correlation to the winds speeds on a diurnal basis. Chart 2 shows the same data set sorted down to 15 mph which results in about 8000 points from the entire data set. Note that in the highest energy segment, your anemometer actually shows a higher output (this is also reflected by the blue tips on the high points in Chart 1). However, the data shows for this set a slightly lower wind speed than the Bell Rapids 50m anemometers from about 32 mph on down. In a statistical comparison we find your data may indicate a slightly lower capacity factor than the Bell Rapids 50m anemometer, by perhaps as much as 5%. However, I actually suspect that your site is slightly better or at least equal. The main reason for this is the anemometer placement at your site is almost in a valley instead of on the ridge on your property. The 50m anemometer has the top instruments only 164 ft above ground level and I noted during the site visit, that your ridge is almost 50 ft higher in elevation than the anemometer tower base near the county road. Thus, that anemometer is significantly affected and worse is simply not in the right place. The good news, however is that your data does correlate very well and should be extremely conservative. Based on your data alone, I would predict your net capacity factor to be approximately 30% after accounting for all losses and in comparison to other calculated capacity factors in that area.

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"Virtutem, Formam, Decorem" (Merit, Beauty, Honor)

However, if I were to predict a net capacity factor when taking into consideration the anemometer location and other factors including comparisons to multiple anemometers I would predict the calculation to be more like 32%. This can be enhanced of course by the special large blades expected to be available for the Clipper Wind Turbines late next spring. My recommendation is that we install an additional 50m anemometer on the ridgeline itself to validate this as soon as you know you can get a contract for the purchase of energy. There are several used anemometers available now from people who don't think they will be able to pursue wind anymore.

As far as the site location is concerned, the project fits your area very well and furthermore your ridge lines up nicely with the wind rose in that region.

The last two sheets are summaries from your entire data set that show the maximum speed over the past year at 68 mph on April 7 of this year. The wind rose shows the now famous predictability of the wind from the west in your region with the smaller amount from the east. This is particularly convenient on your ridge which runs north-south in the area and it also allows you to place turbines closer to each other since you have virtually no North-South winds.

The complete financial wind analysis and report you require is almost done and will be ready to send to the investors on their schedule, assuming things go well with your Power Purchase Agreement. I believe this project can be coordinated for a sequential construction with another project in particular which should go in near you next year also. This report should be sufficient to indicate the depth of the study we've done, without divulging any information of strategic importance.

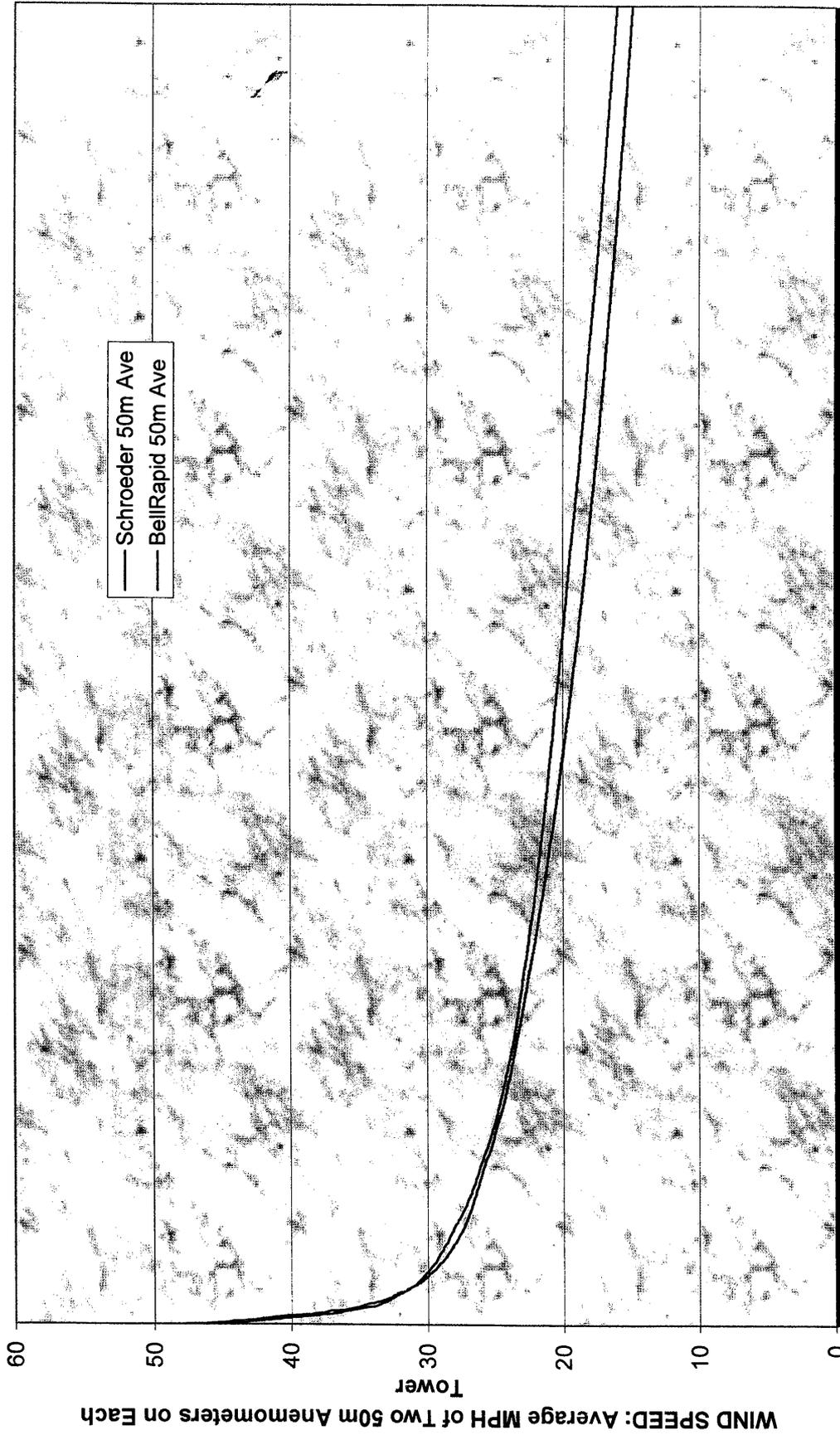
Should you require more information I am available at your convenience.

Sincerely,



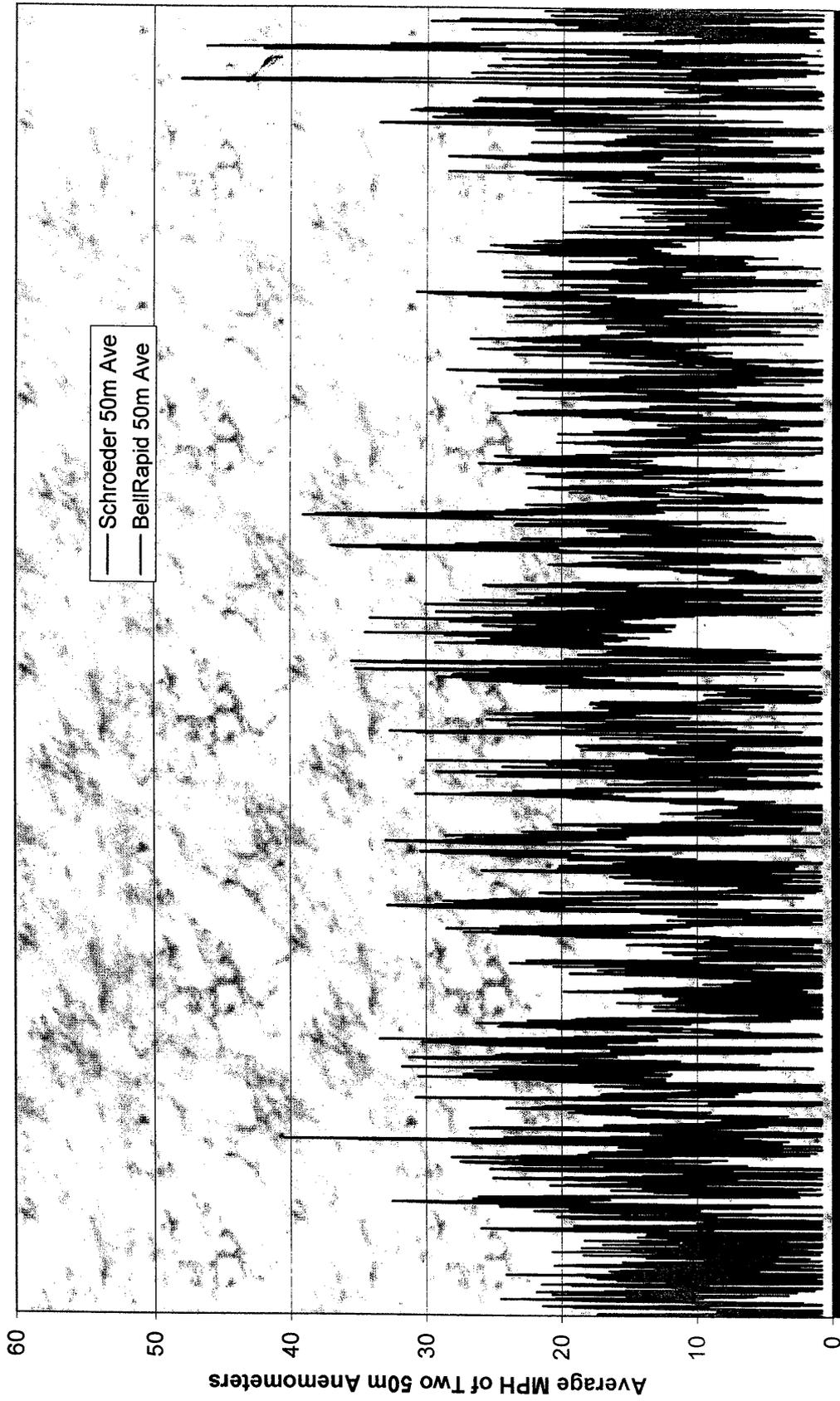
Brian D. Jackson, PE MBA CEM
Project Engineer

CHART 2: Data Speed Correlation Schroeder 50m and Bell Rapids 50m



Data Points

CHART 1: Daily Data Correlation Schroeder 50m and Bell Rapids 50m



1 1429 2857 4285 5713 7141 8569 9997 11425 12853 14281 15709 17137 18565 19993 21421 22849 24277 25705

Data Points

Site Information:

Project: East Ridgeline
 Location: Bell Rapids Plateau
 Elevation:

Sensor Information:

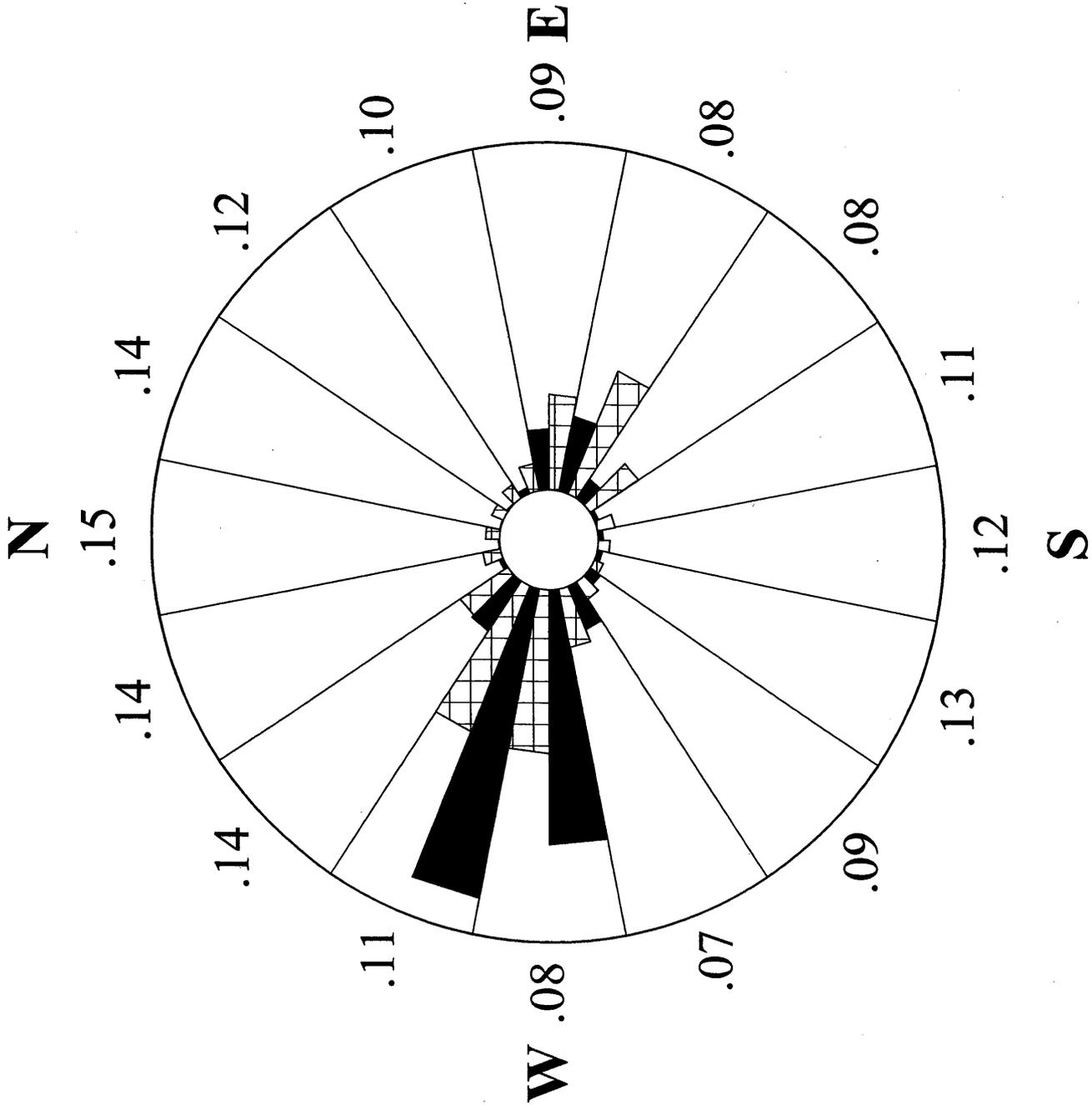
- 1 NRG #40 Anem. mph
- 2 NRG #40 Anem. mph
- 3 NRG #40 Anem. mph
- 4 NRG #40 Anem. mph
- 5 No SCM Installed
- 6 No SCM Installed
- 7 #200P Wind Vane
- 8 #200P Wind Vane
- 9 NRG #110S Temp. F
- 10 No SCM Installed
- 11 No SCM Installed
- 12 No SCM Installed

4/2/2004 to 7/27/2005

Summary Report

SITE 4219
 Schroeder 50m

Channel	1	2	3	4	7	8	9
Height	164 ft	164 ft	131 ft	98 ft	164 ft	98 ft	20 ft
Units	mph	mph	mph	mph	deg	deg	F
Intervals with Valid Data	69384	69384	69384	69384	69384	69384	69384
Average Filtered Data	12.83	12.4	11.78	11.45	269.31	267.25	52.59
Average for All Data	12.83	12.4	11.78	11.45	269.31	267.25	52.59
Min Interval Average	0.8	0.8	0.8	0.8			-123.5
Date of Min Interval	4/2/2004	4/2/2004	4/2/2004	4/2/2004			4/2/2004
Time of Min Interval	12:00:00 AM	12:00:00 AM	12:00:00 AM	12:00:00 AM			12:00:00 AM
Max Interval Average	56	55.4	51.8	51.4			103.8
Date of Max Interval	4/7/2005	4/7/2005	4/7/2005	4/7/2005			7/12/2005
Time of Max Interval	6:30:00 PM	6:30:00 PM	6:30:00 PM	6:30:00 PM			5:20:00 PM
Average Interval SD	1.42	1.48	1.49	1.47	7.93	8.11	0.15
Min Sample	0.8	0.8	0.8	0.8			-123.5
Date of Min Sample	4/2/2004	4/2/2004	4/2/2004	4/2/2004			4/2/2004
Time of Min Sample	12:00:00 AM	12:00:00 AM	12:00:00 AM	12:00:00 AM			12:00:00 AM
Max Sample	68.4	67.5	66.6	64.2			126.4
Date of Max Sample	4/7/2005	4/7/2005	4/7/2005	4/7/2005			4/2/2004
Time of Max Sample	6:30:00 PM	6:30:00 PM	6:30:00 PM	6:30:00 PM			6:50:00 PM
Average Interval TI	0.16	0.17	0.18	0.17			
Wind Speed Direction					W	W	



4/2/2004 to 7/27/2005	
Wind Rose Ch 1, 7	
SITE 4219	
Schroeder 50m	
Site Information:	
Project:	East Ridgeline
Location:	Bell Rapids Plateau
Elevation:	
Anemometer on channel 1:	
NRG #40 Anem. mph	
Height: 164 ft	
Serial #: SN:	
Vane on channel 7:	
#200P Wind Vane	
Height: 164 ft	
Serial #: SN:	
Outer Numbers are Average TIs for speeds greater than 10 mph	
Inner Circle = 0%	
Outer Circle = 40%	
	Percent of Total Wind Energy
	Percent of Total Time