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IDAHO PUBLIC
UTILITIES COMMISSION

*Attorneys for Cassia Wind Park LLC
And Cassia Wind LLC*

ORIGINAL

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF
CASSIA WIND TO DETERMINE
EXEMPTION STATUS

Case No. IPC-E-05- 35

AFFIDAVIT OF JARED GROVER

Jared Grover, being first duly sworn upon an oath, deposes and says:

I am a principle member of Cassia Gulch Wind Park LLC and Cassia Wind Farm LLC LLC (“collectively, Cassia Wind”) and make this Affidavit in support of Cassia Wind’s Motion to Determine Exemption Status, filed herewith. I am over the age of 21 years, and make this Affidavit of my own knowledge.

Cassia Wind meets the exemption criteria specified in Commission Order No. 29839 for the following reasons:

Threshold Criteria

Power Purchase Agreement

I followed in the instructions provided for me by Idaho Power Company for my interconnection study, and according to the instructions, Idaho Power Company would prepare

and forward a power purchase agreement to me. I have never received one (even though one application was submitted in May). Since these are the first PURPA projects I have been involved in, I didn't have a draft of the previous agreement, nor did I have legal counsel at the time who could prepare one on my behalf. I have been relying on Idaho Power Company to provide me one as described in the instructions, and did not have a chance to sign one. But for the inaction of Idaho Power Company a Purchase Power Agreement would have been signed prior to July 1, 2005.

Interconnection Request

I submitted a completed Application for Interconnection Study and payment of fees for each of my projects. One was dated May 26, 2005, and the other dated June 16, 2005. I also paid the Fees by check at the time of submittal, May 24, 2005 and June 15, 2005 respectively. Copies of my applications were submitted with my Direct Pre-Filed Testimony.

I believe that for these reasons that both projects meet the "primary criteria" for grandfathered status.

Secondary Criteria

Wind Study

I have collected a substantial amount of data, and have completed a wind study. I have a percentage ownership in four anemometer towers used for collecting data, and also have complete ownership of an additional 50 meter tower at my site. Usually at least six months to one year of data from one or more anemometers is required to complete a wind study. Data was collected from the oldest anemometer that I have ownership in back 2002. The projects I am involved with have much more data than minimally required.

I have used tools developed by the Idaho National Lab to evaluate my data. The nearby operational Fossil Gulch wind project also validates the viability of my projects wind resources. Based on this I believe the projects are viable. The investors I have worked with hired independent consultants to verify my wind study. Based on the results of my wind study, if I am able to get a power purchase agreement, the investors feel confident that my project will be a success.

The data and the results of the analysis are highly confidential. They will be made available upon execution of an appropriate Protective Agreement.

I believe that for these reasons, the both projects meet the “secondary criteria” for grandfathered status.

Project Financing

I have been working with several different investors which have been interested in financing the projects. None of the investors I have met with have been willing to commit to financing without a signed Power Purchase Agreement. However, anticipating a power purchase agreement, the investors have performed due diligence on the projects and are very interested to provide financing as well as turbines for the projects.

The potential investors have requested that they remain anonymous to the public and to my competitors. Upon execution of a confidentiality agreement, and if either project does not already meet the secondary criteria the two-prong grandfathering test with the wind study, documentation can be provided to Commissioners or Staff regarding Project Financing.

Wind Turbines

Wind turbines are available for my wind projects. The investors interested in my project have allotted turbines for my project. (See Exhibit A) The investors have contracts in place for

supply of wind turbines. I have selected one investor out of several investors having access to turbines, but obviously a power purchase agreement needs to be signed before they make a multi million dollar commitment of turbines to my specific project.

Permitting and Licensing and Other Progress

Although one would typically wait for a power purchase agreement and interconnection study before investing a substantial amount of time and money in obtaining permits, access rights, and licenses for the potential project, I have chosen to continue to move ahead anyway.

Much progress has been made on the permitting and licensing path for the Cassia Wind projects. Since land where these projects will be constructed is owned by members of the wind projects, and because country roads and utilities border the properties, access controls (easements etc) to land for roads, utilities etc are not an issue. I own the land for one of the projects, and another member of the Cassia Wind Farm LLC owns the other property. Exhibit B is a letter providing Cassia Wind Farm LLC with the option of arranging a wind farm on that property.

In addition to owning the land, extraordinary efforts are being taken to ensure a smooth completion of the permitting process. One such effort is arranging a land swap for a neighboring land owner. I am under obligation to finalize the purchase of approximately 700 additional acres of land (See Exhibit C) that may be used for the land swap as well as to provide alternative sites for access to the projects. The additional land can also provide alternative turbine placement options if necessary based on the geothermal studies, planning and zoning, or interconnection studies are finished. With the price of land being sold for over 300 dollars an acre, the obligation to purchase this much additional land for my wind project comes at a significant cost. Based on a \$300 per acre price, the cost is over \$200,000. I will be liable to purchase this land even if I fail to get a Power Purchase Agreement from Idaho Power Inc.

Both projects have filed as Qualifying Facilities under FERC and were issued QF numbers before the August 4th 2005. Since that time FAA filings have also been submitted.

I have been in contact with Bureau of Land Management, Idaho Fish and Game, the Twin Falls Planning and Zoning Administration as well as the Idaho Transportation Department for applicable permits and licenses. The Interconnection Feasibility study for one of the projects has been completed. Completion of other studies such as System Impact Study, and Facility Study, and Interconnection Agreement may be required before finalizing easements and collecting details for final permits.

Based on the above information, I believe that Cassia Wind Farm LLC and the Cassia Gulch Wind Park LLC meet both the "primary" and "secondary" requirements for grandfathering.

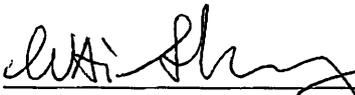
Dated this 26 day of October, 2005.



Jared Grover

State of New York)
 :SS
County of New York

On this 26 day of October, 2005, before me Chris W Shung, a notary public, personally appeared Jared Grover known or identified to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.



Notary Public for New York
Residing at: _____
Commission Expires CHRIS W. SHUNG

NOTARY PUBLIC, STATE OF NEW YORK
No. 01SH6095141
QUALIFIED IN NEW YORK COUNTY
MY COMMISSION EXPIRES July 1, 2007

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of October, 2005, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
P.O. Box 83720
Boise, ID 83720-0074
jjewell@puc.state.id.us

Hand Delivered
U.S. Mail
Fax
Fed. Express
Email

Barton L. Kline
Monica B. Moen
Idaho Power Company
1221 West Idaho Street
P.O. Box 70
Boise, ID 83707
BKline@idahopower.com
MMoen@idahopower.com

Hand Delivered
U.S. Mail
Fax
Fed. Express
Email



RENAISSANCE ENGINEERING & DESIGN PLLC

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

August 19, 2005

CASSIA WIND PROJECTS

Jared Grover
4219 N Creswell Way
Boise ID 83713

Cassia Wind Farm
Cassia Gulch Wind Farm
Wind Analysis Summary Memo

Dear Jared,

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.

I have spent two years collecting and analyzing data for Bell Rapids Irrigation District. In fact, I helped install the first anemometer for the district which was a loaned anemometer providing data for public benefit demonstrating the wind resource on the plateau. In addition to the first anemometer installed with a 20m tower a couple years ago, Bell Rapids Irrigation District this last year purchased the Idaho Power reference anemometer to the East towards the canyon rim. That was a loaned anemometer and Idaho Power expressed no interest in keeping it for themselves or purchasing it. Also, last fall I helped your manager Robert Lipskoch install a 50 meter investment grade anemometer on the west end of the project acreage near your personal property. In addition to the two reference 20 meter anemometers and the 50 meter unit, we installed two additional 20 meter anemometers on lands to the south and west to enable assessment of wind across the entire plateau. Shortly after those installations you put up your own 50 meter anemometer on your private property about 1 mile from that site.

It is my understanding that upon selling the water, decisions were made by the Bell Rapids Irrigation District to sell the company land instead of keeping it and trying to create anything as a group. Through your shares in the company, you clearly had access to the site and your interconnection filings made sense to essentially secure wind rights not only for your own private land, but also to work in conjunction with the corporate lands as well as your neighboring farm. Discussions between you and myself at that time relating to this project were revolving around the development with Bell Rapids in comparison to simply buying the land. Your indication which was confirmed by Robert Lipskoch even then was that the Bell Rapids Company did not intend to develop a wind park, but that it looked like you would be able to buy the land. Since you now have officially added 700 acres to your land we have over a thousand acres available for the larger wind park. That land includes data from two 50 meter anemometers, the one I helped install and the one on your personal property.

RENAISSANCE ENGINEERING & DESIGN PLLC

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

The formal, complete data analysis for the Bell Rapids area is a requirement as an exhibit in a financial package as part of the due diligence. In this case, however, we have multiple anemometers to compare with and other projects happening all around your sites. As you know, there are only subtle differences between anemometers all around the Bell Rapids area. Thus, any anemometer closely indicates the potential wind resource in that area. There is no doubt about the extent of the resource and no doubts about whether or not the projects can be built there. Furthermore, Twin Falls county has approved at least five windparks in the area and thus you should have every expectation that with the appropriate studies and application documentation approval from the planning and zoning for conditional use will be granted.

CASSIA WIND FARM: 10.5 MW Interconnection App: 5/26/2005

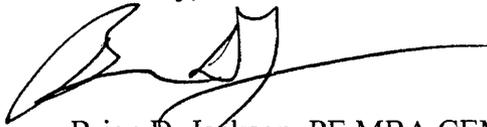
Clearly you satisfy major distinct qualification requirements in the two listed categories. The first important qualification is the application date for interconnection. That was done for the first project Cassia Wind Farm in anticipation of using seven GE 1.5MW Turbines.

CASSIA GULCH WIND FARM: 18.9 MW Interconnection App: 6/16/2005

Clearly you again satisfy major distinct qualification requirements in the two listed categories. The first important qualification is the application date for interconnection. The second project named Cassia Gulch Wind Farm is larger total in size. Originally this anticipated using 9 Suzlon 2.1 MW Wind Turbines, then after a group of GE turbines were found after this interconnection application, the intent was leaning toward installation of 12 GE 1.5 MW turbines. In particular this made sense to match the same units for the Cassia Wind Farm. Furthermore, the additional acreage you were securing at the time for this entire development lessened the need for the larger turbines as a critical requirement.

More than 19 GE 1.5MW turbines with 100 meter towers have been retained for these two Cassia projects and other projects since June of 2005. They have been ready for shipment since July waiting for conclusion of the interconnection and power purchase agreement issues with Idaho Power Company. These turbines are still available though they may be sold outside of the US very soon since there are several interested buyers. However, recent developments have led to an arrangement for Clipper Wind Turbines which can be delivered to your project for a 2006 installation. Once final contract agreements are reached for these projects in the power sales and other categories, we can develop a true project construction schedule.

Sincerely,



Brian D. Jackson, PE MBA CEM

Jared Grover
Cassia Wind Farm LLC
4219 N Creswell Way
Boise ID 83713
208 371 4066
208 323 6155 fax

May 15, 2005

Sherman Young
3134 South 1900 East
Wendell, ID 83355

RE: Option to develop wind conversion electrical generation on approximately 220 acres of land currently owned by Sherman Young.

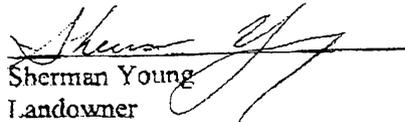
Cassia Wind Farm LLC (Cassia) enters into an agreement to further explore the development of approximately 220 acres of land located in Twin Falls County, and Elmore County, ID. Cassia will provide the pre-development services necessary to complete a study as to the viability of the site for wind conversion generation.

If the site proves commercial viable, Cassia would proceed to secure the necessary agreements for the purchase of power from the site and the financing for the project completion. Cassia would further explore the arrangement in offering a percentage of net profits from any development, sale, or other transaction if a wind park is developed on the site as described in Exhibit A. Cassia will make a determination of the viability of entering into a mutually beneficial agreement with (6) months from the date of execution of this letter. Such an arrangement may include, but not be limited to, reimbursement based on the net profits, gross revenues, or another such calculation which is mutually beneficial.

This letter shall serve to provide the Option to enter into an arrangement on said property. Cassia Wind Farm LLC appreciates this opportunity. Signatures below shall memorialize this Option to enter into an arrangement.

Sincerely,


Jared D. Grover
Manager, Cassia Wind Farm LLC


Sherman Young
Landowner

**BELL RAPIDS MUTUAL IRRIGATION CO.***Idaho's Finest Cooperative Irrigation Development***MANAGEMENT**

388 EAST 5900NORTH - HAGERMAN, ID 83332
(208)837-6241 - FAX: (208)837-4542
E-MAIL:bellrapids@magiclink.com



August 22, 2005

Jared Grover
4200 Cloverdale
Boise, Id. 83713

Jared,

Bell Rapids accepts your bids for the following property:

Unit #62, approximately 316 acres.
Unit #57a, approximately 158 acres.
Unit #52a, approximately 160 acres.
Unit #10, approximately 59 acres.

BRMIC will be in contact with you soon.

Good luck on your future wind parks!

Thank you,

Diana Bray, Office Manager