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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Cassia Gulch Wind Park LLC  
and Cassia Wind Farm 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**

**SUPPLEMENTAL AFFIDAVIT OF  
JARED GROVER**

STATE OF IDAHO )  
  :  
County of Ada        )

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

1. I am the principle member of Cassia Gulch Wind Park LLC and Cassia Wind Farm LLC (“Cassia Wind”).
2. Attached hereto as Exhibit A is a letter transmitted by John Deere Credit Company (“JDC”) to Idaho Power Company on November 30, 2005. John Deere Credit is a subsidiary of the John Deere Company, and has the financial capacity to provide financing to the Cassia Wind Projects. The JDC letter to Idaho Power Company represents the culmination of discussions between Cassia Wind that began in the spring and early summer of 2005.
3. Attached hereto as Exhibit B is a letter from Signal Wind Energy construction company experienced in the installation of wind turbines. As noted in Exhibit B, it is



**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of December, 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](mailto: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](mailto:BKline@idahopower.com)  
[MMoen@idahopower.com](mailto:MMoen@idahopower.com)

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





**JOHN DEERE**  
**CREDIT**

6400 NW 86<sup>TH</sup> STREET, JOHNSTON, IOWA 50131  
DIRECT PHONE: (515) 267-4199

November 30, 2005

Mr. Barton L Kline  
Idaho Power Company  
1221 West Idaho Street  
P.O. Box 70  
Boise, ID 83707

RE: Cassia Gulch Wind Park, LLC  
Cassia Wind Farm, LLC  
Confirm Availability of Suzlon 2.1MW Nameplate Turbines

Dear Mr. Kline:

John Deere Credit ("JDC"), an affiliate of Deere & Company, provided Cassia Gulch Wind Park, LLC and Cassia Wind Farm, LLC (collectively, "Cassia Wind") a Term Sheet in August 2005, a copy of which was previously provided to Idaho Power Company. The Term Sheet outlined the proposed investment in and the financing of the two Cassia Wind projects. The parties are currently finalizing the requirements of the due diligence process.

Prior to issuing the Term Sheet for the Cassia Wind projects, JDC staff met on numerous occasions with Mr. Grover, the developer, starting in May 2005. JDC and Mr. Grover entered into a confidentiality agreement on 1 July 2005 and thereafter began our internal due diligence process with the full intent of closing the deal as soon as possible. Much of the due diligence process has been completed, including an on-site physical visit to survey the proposed wind farms by our in-house engineer in July and an independent, third-party produced, wind data analysis issued by WindLogics, which JDC has accepted.

JDC is considering a commitment for the investment, debt and allocation of a total of 14 Suzlon S-88 Arctic 2.1MW nameplate turbines, which have been secured by JDC from Suzlon Wind Energy Corp., to the Cassia Wind projects. In order to complete the due diligence process and submit the projects to JDC's senior management for approval, JDC requires a confirmation from the Idaho Public Utilities Commission that each of the projects will be exempt from the reduction of rate cap eligibility reduction contained in Idaho Public Utilities Commission Order No. 29839. If approved by JDC's senior management team, JDC and Cassia Wind anticipate that both of the projects will be commissioned no later than December 2006.

Mr. Barton L. Kline  
Idaho Power Company  
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The enclosed information is being provided by JDC and Cassia Wind at the request of Idaho Power Company. It is to be used by Idaho Power Company solely for the purpose of evaluating the maturity of the Cassia Wind projects as required by Idaho Public Utilities Commission Order NO. 29839, and for no other purpose. No copies of this letter may be made except as may be necessary for the above purposes. When copies are made, such copies must clearly reveal the confidential markings. Idaho Power Company shall neither disclose the existence nor the content of this letter to any third party without the written consent of JDC and Cassia. If any regulatory body requires the production of this letter, Idaho Power will consult with JDC and Cassia before production of the letter with a view toward redacting any portions of the letter considered by JDC or Cassia to be confidential or a trade secret.

Sincerely,

JOHN DEERE CREDIT



David M. Brija-Towery  
Business Development Manager – Wind Energy

Cc: Mr. Jared Grover, Cassia Wind Projects  
Mr. Dean J. Miller, McDevitt & Miller



November 17, 2005

Cassie Gulch Wind Park  
4200 North Cloverdale Road  
Boise, Idaho 83704

Attn: Jared Grover

Subject: Cassia Wind Farm and Wind Park Projects

Dear Mr. Grover

As we discussed I wanted to give you an update on the cost and schedule concerns as they relate to your Cassia Wind Farm and Cassia Wind Park Projects.

While cost increases due to material prices and expedited delivery will impact the project cost as the notice to proceed date extends, the largest risk for completing the project in 2006 is being able to procure material and specialty equipment at all. Substantial engineering needs to take place prior to procurement of material and equipment. In addition, the specialty equipment needed to install wind turbines such as a 300-500 ton crane is in very high demand.

Without approval to begin work prior to the end of the year the projects will suffer cost increases and schedule extensions. Please keep us informed on your progress and feel free to call if you have any further questions.

Best regards,

Ben Fischer  
President