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August 6, 2007

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VIA OVERNIGHT DELIVERY

IDAHO PUBLIC
UTILITIES COMMISSION

Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

Attention: Jean D. Jewell
Commission Secretary

Re: Reply Comments of PacifiCorp in Case No. IPC-E-06-21

Rocky Mountain Power, a division of PacifiCorp, hereby submits for filing an original and eight (8) copies of its Reply Comments in Case No. IPC-E-06-21, Cassia Gulch Wind Park, LLC and Cassia Wind Farm, LLC.

Service of pleadings, exhibits, orders and other documents relating to this proceeding should be served on the following:

Dean Brockbank
Senior Attorney
Rocky Mountain Power
One Utah Center, Suite 2200
201 South Main
Salt Lake City, UT 84111
dean.brockbank@pacificorp.com

Brian Dickman
Manager, Idaho Regulatory Affairs
Rocky Mountain Power
One Utah Center, Suite 2300
201 South Main
Salt Lake City, UT 84111
brian.dickman@pacificorp.com

It is respectfully requested that all formal correspondence and Staff requests regarding this material be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, Oregon, 97232

By fax: (503) 813-6060

Sincerely,

Jeffrey K. Larsen
Vice President, Regulation
Enclosures

cc: Service List in Docket No. IPC-E-06-21

Dean Brockbank
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201 S. Main Street, Suite 2300
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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

CASSIA GULCH WIND PARK, LLC AND)	
CASSIA WIND FARM, LLC,)	CASE NO. IPC-E-06-21
)	
COMPLAINANTS,)	
)	REPLY COMMENTS OF
v.)	ROCKY MOUNTAIN
)	POWER
IDAHO POWER COMPANY,)	
)	
RESPONDENT.)	
_____)	

COMES NOW PacifiCorp dba Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), by and through its attorney of record, and respectfully submits the following reply comments in the above referenced matter.

REPLY COMMENTS

As noted in the Comments of Commission Staff filed with the Idaho Public Utilities Commission (“Commission”) on July 25, 2007, the Commission Staff has evaluated and recommended approval of the Settlement Stipulation between Idaho Power Company and Cassia Gulch Wind Park, LLC and Cassia Wind Farm, LLC (“Cassia” or the “Projects”).

Applicability of the Settlement Stipulation to Other QFs and Other Utilities

In the Commission Staff's Comments, they review the applicability of the Settlement Stipulation to other qualifying facilities ("QF") and other utilities in Idaho including Avista and Rocky Mountain Power and recommend that the approach taken by Idaho Power and these settlement terms and conditions are reasonable and be considered when the other utilities face transmission constraints due to QF interconnection and associated transmission system upgrades.

Rocky Mountain Power disagrees with Commission Staff on their recommendation to make a broader application of this settlement to other utilities outside of Idaho Power for the following reasons:

1. Rocky Mountain Power was not a party to any settlement discussions or to the Settlement Stipulation and the transmission study undertaken by Idaho Power in the Twin Falls area even though the Company's Midpoint-Summer lake transmission line is part of the electrical system where these QFs are interconnecting with Idaho Power. The Exhibit C in the Settlement Stipulation only lists the underlying system of Idaho Power and is not inclusive of other utilities that may be impacted by the system upgrades and redispatch scenarios proposed.
2. Rocky Mountain Power is concerned that by Idaho Power agreeing to a settlement where they pay upfront for the network upgrade cost of an interconnection request, it will cause an increase in Idaho Power's revenue requirements and may

cause a change in Idaho Power's FERC filed tariff rate. Rocky Mountain Power, as a user of Idaho Power's transmission system, would likely be subject to increased transmission costs necessary to serve its retail customers. Rocky Mountain Power is concerned that a broad rule implementing the Settlement Stipulation could set a precedent that Rocky Mountain Power might be forced to follow if a QF connects to the Company's system in the Goshen area where constraints exist and involves multiple utilities.

3. The Settlement Stipulation provisions do not take into consideration any impact to existing customers or to legacy transmission agreements such as the Restated Transmission Services Agreement ("RTSA") between the Company and Idaho Power. For example, in the RTSA, the Company can utilize the reserve capability of the Company's west side hydro system in its east side control area. Up to 100 MW of east control area spinning reserves can be met from resources in the west control area as well as bi-directional transfers of 104 MW of power and energy between the Company's west side and east side control areas. Rocky Mountain Power is concerned, and would like to ensure that the Settlement Stipulation does not impact its ability to continue operating under the RTSA as it has historically.
4. The Company incorporates by reference its initial Comments of PacifiCorp, filed with the Commission on October 27, 2006. Rather than re-address those issues in these Reply Comments, the Company requests that the Commission consider the

same points that the Company made in those original Comments when evaluating these Reply Comments.

CONCLUSION

For the reasons set forth above, Rocky Mountain Power recommends the general terms and conditions or methodology of the Settlement Stipulation only apply to the specific facts of the case with Idaho Power and Cassia Wind, and not to other utilities in Idaho in other situations. All communications regarding these comments should be directed to Brian Dickman at (801) 220-4975.

Respectfully submitted this 6th day of August, 2007.

A handwritten signature in black ink that reads "Dean Brockbank /pp". The signature is written in a cursive style and is positioned above a horizontal line.

Dean Brockbank
Attorney for Rocky Mountain Power

PROOF OF SERVICE

I hereby certify that on this 6rd day of August 2007 I caused to be served, via E-mail and U.S. mail, a true and correct copy of the foregoing REPLY COMMENTS OF PACIFICORP in Case No. IPC-E-06-21 to the following parties as shown:

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Commission Secretary
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Debbie DePetris
Supervisor, Regulatory Administration