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IDAHO PUBLIC
UTILITIES COMMISSION

JULIA A. HILTON
Corporate Counsel
jhilton@idahopower.com

May 14, 2013

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-06-34
Hot Springs Windfarm, LLC – Application

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Application.

Very truly yours,

Julia A. Hilton

JAH:csb
Enclosures

1221 W. Idaho St. (83702)
P.O. Box 70
Boise, ID 83707

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Attorneys for Idaho Power Company

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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR INCLUSION OF OMITTED PRICING INFORMATION IN THE FIRM ENERGY SALES AGREEMENT BETWEEN IDAHO POWER COMPANY AND HOT SPRINGS WINDFARM, LLC.	)	CASE NO. IPC-E-06-34 APPLICATION

In accordance with *Idaho Code* § 61-503 and RP 052 and RP 201, Idaho Power Company ("Idaho Power" or "Company") hereby respectfully applies to the Idaho Public Utilities Commission ("Commission") for an order including additional pricing information in the Firm Energy Sales Agreement ("Agreement") between Idaho Power and Hot Springs Windfarm, LLC ("Hot Springs") whereby Hot Springs sells and Idaho Power purchases electric energy generated by the Hot Springs project. Idaho Power initially sought to provide this information to the Commission via a letter. However, Commission Staff requested that the Company submit this information via an application.

In support of this Application, Idaho Power represents as follows:

I. INTRODUCTION

1. On December 26, 2006, in Case No. IPC-E-06-34, Idaho Power filed an application with the Commission for approval of the Agreement. The Commission approved the Agreement on February 20, 2007, in Order No. 30246.

2. The terms of the Agreement state that the Agreement will be in effect for 20 years, beginning upon the project's Operation Date. *See* pages 6-7 of the Agreement filed in Case No. IPC-E-06-34. Due to delays, the Operation Date did not occur, and therefore the term of the Agreement did not begin, until 12 months after the anticipated Operation Date. The Agreement contains pricing information for the 20 years following the Operation Date. However, because that Operation Date was delayed, the 20-year pricing schedule within the Agreement does not extend through the full term of the Agreement.

3. In April 2013, Hot Springs notified Idaho Power that the 20-year pricing schedule did not extend for the full term of the Agreement. The pricing contained in the Agreement is based upon the standard published avoided cost rates in effect at the time the Agreement was executed and in accordance with Order No. 29646. *See* page 11 of the Agreement filed in Case No. IPC-E-06-34.

4. Therefore, on May 3, 2013, Idaho Power provided Hot Springs with a letter setting forth the pricing to be applied to the last 12 months of the term of the Agreement based upon the standard published avoided cost rates in effect at the time. Attachment 1. As described in the letter and as set forth in Order No. 29646, standard published avoided cost pricing for the final 12 months is:

Year	Season 1- (73.50 %) Mills/kWh	Season 2- (120.00 %) Mills/kWh	Season 3- (100.00 %) Mills/kWh
2028	62.50	102.04	85.04

5. Idaho Power requests that the Commission approve the inclusion of these additional prices into the terms of the Agreement in order to clarify the rates in effect for the final 12 months of the Agreement.

II. MODIFIED PROCEDURE

6. Idaho Power believes that a technical hearing is not necessary to consider the issues presented herein and respectfully requests that this Application be processed under Modified Procedure; i.e., by written submissions rather than by hearing. RP 201, *et seq.* The Company stands ready to present the testimony in support of this Application in a technical hearing if the Commission determines such a hearing is required.

III. COMMUNICATIONS AND SERVICE OF PLEADINGS

7. Communications and service of pleadings with reference to this Application should be sent to the following:

Julia A. Hilton
Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, ID 83707
jhilton@idahopower.com
dockets@idahopower.com

Randy Allphin
Energy Contracts Leader
Idaho Power Company
P.O. Box 70
Boise, ID 83707
rallphin@idahpower.com

IV. REQUEST FOR RELIEF

8. As described in greater detail above, Idaho Power respectfully requests that the Commission issue an order approving the inclusion of the above-described pricing terms for the last year of the Agreement and finding it reasonable to allow these

payments made under the Agreement as prudently incurred expenses for ratemaking purposes.

DATED at Boise, Idaho, this 14th day of May 2013.

JULIA A. HILTON
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 14th day of May 2013 I served a true and correct copy of the foregoing APPLICATION upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff Kristine Sasser Deputy Attorney General Idaho Public Utilities Commission 472 West Washington (83702) P.O. Box 83720 Boise, Idaho 83720-0074	_X_ Hand Delivered ____ U.S. Mail ____ Overnight Mail ____ FAX _X_ Email kris.sasser@puc.idaho.gov
Hot Springs Windfarm, LLC Richard Free Director, Utility & Regulatory Process Support Bennett Creek Windfarm, LLC c/o Exelon Wind, LLC 4601 Westown Parkway, Suite 300 West Des Moines, Iowa 50266	____ Hand Delivered _X_ U.S. Mail ____ Overnight Mail ____ FAX _X_ Email Richard.Free@exeloncorp.com

Christa Bearry, Legal Assistant

BEFORE THE

IDAHO PUBLIC UTILITIES COMMISSION

CASE NO. IPC-E- 06-34

IDAHO POWER COMPANY

ATTACHMENT 1

IDAHO POWER®
An IDACORP Company

May 3, 2013

Hot Springs Wind Farm, LLC
c/o Exelon Wind, LLC
Attn: Richard Free, Director, Utility and Regulatory Process Support
4601 Westown Parkway, Suite 300
West Des Moines, IA 50266

Sent Via: Email (Richard.Free@exeloncorp.com), Certified Mail

Subject: Hot Springs Wind Farm - Project Number – 21615105

Dear Richard,

Recently you contacted Idaho Power regarding your discovery that the pricing schedules contained in Article VII of the Firm Energy Sales Agreements (Agreement) between Bennett Creek Wind Farm, LLC and Idaho Power Company dated 12/20/2006 do not extend through the full 20 year term of the Agreement.

The pricing within this Agreement contains the standard published avoided cost rates in accordance with Idaho Public Utilities Commission (IPUC) order 29646 which was in effect at the time this Agreement was executed. The Agreement does contain 20 years of pricing, however due to the actual Operation Date of 12/15/2008, the full 20 year term of the Agreement extends to December 2028. Review of IPUC Order 29646 provides pricing for 2028 as follows:

Article VII: PURCHASE PRICE AND METHOD OF PAYMENT

7.1 Base Energy Purchase Price:

Year	Season 1 - (73.50 %) Mills/kWh	Season 2 - (120.00 %) Mills/kWh	Season 3 - (100.00 %) Mills/kWh
2028	62.50	102.04	85.04

Idaho Power will file this information with the IPUC and ask that it be included with the original agreement. However, if the IPUC determines that additional information or specific IPUC approval of this information is required such prices shall not be effective until such Commission approval is obtained.

If you have any questions please do not hesitate to contact me.

Sincerely,

Jill Glenn
Energy Contract Coordinator, Sr.
Idaho Power Company|Power Suppy
Jglenn@idahopower.com
208-388-2265

cc: Donovan Walker (IPC)
Randy Allphin (IPC)

P O Box 70 Boise, Idaho 83707 1221 W Idaho St. Boise, Idaho 83702