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sent 7/31/07*

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**Jean Jewell**

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**From:** gfleisch986@hotmail.com  
**Sent:** Friday, July 27, 2007 10:58 AM  
**To:** Tonya Clark; Jean Jewell; Gene Fadness; Ed Howell  
**Subject:** PUC Comment/Inquiry Form

A Comment from Gerald Fleischman follows:

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Case Number: IPC-E-06-35  
Name: Gerald Fleischman  
Address: 11535 W. Hazeldale Ct.  
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Name of Utility Company: Idaho Power Company  
Add to Mailing List:

Please describe your question or comment briefly:

In the Amendment to the Bennett Creek Wind Farm PURPA power sales agreement Idaho Power states it will modify its contract rules so that prospective wind farms can not get a power sales agreement before they have already received a transmission interconnection agreement. I think this is a mistake. The two business units of Idaho Power - Power Supply and Transmission - are supposed to deal with each other 'at arms length'. What happens if there is a good wind site and it goes through the logical process of first obtaining a transmission interconnection agreement and then a moratorium is imposed on all new PURPA projects and this project does not get grandfathered because it doesn't have a power sales agreement. I think the risk, as evidenced by what happened in the Spring and Summer of 2005, is too great by this kind of imposition. If it were the case that wind farm developers could in good faith go through the process in the logical order without the threat of the rules changing in mid stream, then it would make sense to require interconnection agreements before power sales agreements. Risk is already one the greatest costs to wind farm development. Adding one more level of risk may not be a good idea for Idaho Power Ratepayers as it raises the cost of this generating resource. Wind power, in terms of actual costs for wind farm owners to produce, is at least 50% higher than it was when the Commission imposed the current 'defacto' moratorium two years ago. How much good did this two year delay do Idaho Power ratepayers?

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>  
IP address is 164.165.96.2

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