

✓ Alex Hark
sent 9/26/07

✓ To AV

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Jean Jewell

From: ktinsv@cox.net
Sent: Tuesday, September 25, 2007 5:23 AM
To: Tonya Clark; Jean Jewell; Gene Fadness; Ed Howell
Subject: PUC Comment/Inquiry Form

A Comment from Kiki Leslie A. Tidwell follows:

Case Number: *IPC-E-07-04*
Name: Kiki Leslie A. Tidwell
Address: P.O. Box 2919
City: Ketchum
State: Idaho
Zip: 83340
Home Telephone: 208-578-7769
Contact E-Mail: ktinsv@cox.net
Name of Utility Company: Idaho Power
Add to Mailing List: yes

Please describe your question or comment briefly:
Recently, the Idaho PUC ruled in Case No. IPC-E-07-04 that utilities can also discount the avoided cost rate paid to small power producers with a daily load shape adjustment so that prices match time of delivery pricing. In reviewing FERC rule 292.304 Rates for Purchases, it appears that the Qualifying facility has the option to accept the avoided cost rate or a time of delivery rate. "(d)...Each qualifying facility shall have the option either:(2) To provide energy or capacity pursuant to a legally enforceable obligation for the delivery of energy or capacity over a specified term, in which case the rates for such purchases shall, at the option of the qualifying facility exercised prior to the beginning of the specified term, be based on either: (i) The avoided costs calculated at the time of delivery; or (ii) The avoided costs calculated at the time the obligation is incurred". I believe that the Idaho PUC needs to clarify their ruling in this case so that Idaho is compliant with FERC.

The form submitted on <http://www.puc.idaho.gov/forms/ipucl/ipuc.html>
IP address is 68.105.221.77
