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IDAHO PUBLIC  
UTILITIES COMMISSION

Barton L. Kline  
Senior Attorney

September 26, 2007

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P. O. Box 83720  
Boise, Idaho 83720-0074

Re: Case No. IPC-E-07-13  
Exergy Development Group of Idaho, LLC v.  
Idaho Power Company

Dear Ms. Jewell:

Please find enclosed for filing an original and seven (7) copies of Idaho Power's Answer to Exergy's Motion to Compel Idaho Power to Retain Exergy's Projects in its Interconnection Queue and to Compel a Refund of Deposits Posted by Exergy.

I would appreciate it if you would return a stamped copy of this transmittal letter in the enclosed self-addressed, stamped envelope.

Very truly yours,

Barton L. Kline

BLK:sh  
Enclosures

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IDAHO PUBLIC UTILITIES COMMISSION

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

EXERGY DEVELOPMENT GROUP OF	)	
IDAHO, LLC	)	CASE NO. IPC-E-07-13
	)	
Petitioner,	)	IDAHO POWER'S ANSWER TO
vs.	)	EXERGY'S MOTION TO COMPEL IDAHO
	)	POWER TO RETAIN EXERGY'S
IDAHO POWER COMPANY	)	PROJECTS IN ITS INTERCONNECTION
	)	QUEUE AND TO COMPEL A REFUND
Respondent.	)	OF DEPOSITS POSTED BY EXERGY

COMES NOW Idaho Power Company ("Idaho Power" or the "Company") and hereby answers the Motion of Exergy Development Group of Idaho, LLC ("Exergy") in which Exergy requested the Commission to issue its order as follows:

1. Prohibiting Idaho Power from removing any of Exergy's projects that are the subject of its Complaint from its interconnection queue; and
2. Requiring Idaho Power to comply with Schedule 72 by providing Exergy with the costs for interconnecting its QF projects without first requiring a deposit; and

3. That Idaho Power refund those deposits already posted pending receipt by Exergy of a complete cost breakdown for interconnecting its projects to Idaho Power's electrical system.

In its Motion, Exergy also proposed alternative measures to be implemented if the Commission did not grant the above-described three requests.

Exergy's Motion should be dismissed because Idaho Power's requests that Exergy provide deposits comply with the interconnection process set out in Schedule 72. The Commission should also dismiss Exergy's Motion if the Commission finds that Exergy is using the Complaint process to obtain an advantage over other QF developers with competing interconnection requests.

**Idaho Power's Interconnection Process Ensures Equal Treatment for All Interconnection Customers**

1. Schedule 72 is the Commission approved tariff that governs Idaho Power's QF interconnections. Idaho Power voluntarily filed Schedule 72 in 1990 and the Commission approved Schedule 72 in 1991. From the outset, the purpose of Schedule 72 has been to ensure that interconnection costs for QFs seeking to sell their energy to Idaho Power are assessed in a consistent manner that (1) recovers all of Idaho Power's interconnection costs from QF developers; (2) protects customers from absorbing the costs of abandoned QF projects; and (3) as required by PURPA, does not discriminate against QFs. Schedule 72 apparently has been successful in fulfilling its purpose because, to Idaho Power's recollection, this is the only formal Complaint the Company has ever received claiming that the Company was failing to implement Schedule 72 correctly.

2. Much more recently (2000-2004), the Federal Energy Regulatory Commission (“FERC”) decided that in order to promote competition and non-utility generation it would establish detailed procedures to manage competitive requests to use the interstate transmission system and for recovery of costs from transmission system users. FERC established detailed procedures for studying and allocating transmission capacity and established the queue system for managing transmission requests. (FERC Order No. 885 *et seq.*). In Order 2003 *et seq.*, FERC established detailed rules governing how generating projects interconnect and utilize utility-owned transmission facilities and how the cost of interconnection would be recovered from generation developers. FERC also established a separate queue system for interconnection requests. FERC’s interconnection study and queue management requirements are mandatory and are filed with FERC as a part of Idaho Power’s Open Access Transmission Tariff (“OATT”).

3. To assure compliance with FERC’s regulations, and maintain comparable treatment between QF and non-QF generation developers, Idaho Power applies the FERC rules for managing priority in the interconnection queue and processing all interconnection requests, including QF requests for interconnection under Schedule 72. Applying the FERC procedures to all interconnection requests, including QFs, establishes a uniform, consistent process for analyzing transmission interconnection requests. It provides QFs with certainty as to the processing times and the rules that will be followed in processing the requests for interconnection.

4. To assist the Commission in its understanding of the interconnection process Idaho Power followed with Exergy, it is necessary to briefly describe the process FERC requires for studying interconnection requests and establishing the costs of interconnection

facilities. FERC rules require that each interconnection application go through a four step process.

(a) Application – the developer provides a general description of the project and its location. Application requires payment of an initial refundable deposit in the amount of \$1,000.00 for a small generation interconnection and \$10,000.00 for a large generation interconnection.

(b) Feasibility Study – this is a preliminary evaluation of the facilities, equipment and cost of interconnecting the generating project to the Company's distribution/transmission facilities at the developer's chosen physical location. The developer signs a Feasibility Study Agreement but no deposit is required for a Feasibility Study as the Application deposit collected in step (a) is applied to cover the expenses Idaho Power will incur performing the Feasibility Study. At the conclusion of the Feasibility Study the generation developer is given a written Feasibility Study Report that among other things, presents a list of facilities and a non-binding good faith estimate of cost responsibility. Based on the Feasibility Study Report, the developer can then decide if it wants to stay in the interconnection queue and continue with the design and cost estimation process. If so, a System Impact Study is conducted.

(c) System Impact Study - the system impact study requires execution of a System Impact Study Agreement and the posting of a deposit sufficient to cover Idaho Power's cost of performing the System Impact Study. The cost to perform the System Impact Study differs for each project based on distribution and transmission facilities that are impacted by the proposed generation interconnection. These studies range in cost from a few thousand dollars to \$10,000.00. The System Impact Study produces an

evaluation of the impact of the proposed interconnection on the reliability of the transmission system and a non-binding good faith estimate of cost responsibility which is given to the developer in a written System Impact Study Report.

If the developer, after reviewing the System Impact Study Report concludes that it still desires to remain in the queue and proceed with design and engineering studies, the developer and the Company enter into a contract for a Facility Study.

d. Facility Study – the Facility Study Agreement requires the payment of a deposit to cover the cost of developing the final design specifications. Idaho Power's experience in performing Facility Studies demonstrates that the engineering and design costs make up approximately 10% of the total interconnection costs. For example, if an interconnection will cost \$2 million, the cost of engineering and transmission design for that specific interconnection would be approximately \$200,000. Idaho Power caps its deposit requests at \$100,000. The Facility Study provides a highly refined estimate of the equipment, engineering, procurement and construction work needed to implement the conclusions of the System Impact Study to physically and electrically connect the interconnection project. Construction options are also provided during this time. If long lead-time items need to be ordered in time for Construction, the Company will request funding by the developer to cover these equipment costs.

The intent of this four stage process is to allow the generation project developer to obtain increasingly refined estimates of the costs of interconnecting its project, and to provide an opportunity to withdraw anytime they choose. In any case, Idaho Power will reconcile all deposits against work done for the generation project, and the project

developer will receive a refund of any monies that have not been actually spent, or an invoice for amount(s) due for engineering and design of its' interconnection facilities.

**Collecting Deposits for Interconnection Studies is Permitted Under Schedule 72**

5. In its Motion Exergy alleges that Idaho Power is unlawfully requiring Exergy to provide cash deposits because Schedule 72 does not authorize the collection of deposits. Exergy's allegation is inconsistent with the facts and the provisions of Schedule 72. The pertinent portion of Schedule 72 reads as follows:

**PAYMENT FOR INTERCONNECTION FACILITIES**

Unless specifically agreed otherwise by written agreement between the Seller and the Company, an initial cost estimate of Company-owned interconnection Facilities will be provided to the Seller.

Payment of the estimated cost will be required prior to the Company's ordering, installing, modifying, upgrading, or performing in any other way work associated with the Interconnection Facilities.

Upon completion of the Company-owned Interconnection Facilities, the actual costs will be reconciled against the estimated cost previously paid by the Seller and the appropriate billing or refund will be processed.

The Company reserves the right to collect additional costs from the Seller for any additional Company equipment, modifications, or upgrades the Company deems necessary to operate and maintain a safe, reliable electrical system as a result of the interconnection of the Seller's Generation Facility to the Company's system.

6. Exergy argues that Schedule 72 imposes a two-step process on Idaho Power's ability to collect a deposit for interconnection expense. (Brief p. 4). Step one requires that the Company provide an initial cost estimate of the interconnection facilities that will be required. Exergy argues that without satisfying step one, providing the cost

estimate, the language of Schedule 72 precludes the Company from proceeding to step 2, requesting *any* deposit or prepayment of the estimated cost of performing interconnection studies.

“The phrase “payment of the estimated costs” necessarily assumes that there IS an estimate of the costs. Schedule 72 clearly requires Idaho Power, prior to assessing any costs to the developer, to provide the developer with an estimate of the costs of “ordering, installing, modifying, upgrading or performing in any other way, work associated with the interconnection facilities.” (Brief in Support of Motion p. 8).

7. Exergy seems to be under the mistaken impression that Idaho Power has never provided Exergy with an initial estimate of the costs of the interconnections for each of the generation project at issue in this case. Attached to this Answer as Exhibits 1 through 5 are the pertinent pages from the Generator Interconnection Feasibility Study Reports provided to Exergy for each of the projects at issue in this proceeding. Exhibits 1-5 show that Idaho Power has provided an initial estimate of the cost of interconnecting each of Exergy’s generation projects at issue in this proceeding.

8. Because Idaho Power has satisfied step 1, providing an initial cost estimate, Schedule 72 authorizes the Company to proceed to step 2, requesting a deposit for interconnection studies. Schedule 72 provides “Payment of the estimated cost will be required prior to the Company’s ordering, installing, modifying, upgrading or performing in any other way, work associated with the interconnection facilities.”

9. A literal reading of Schedule 72 indicates that once Exergy has received the initial cost estimate for its QF projects, Idaho Power could have required Exergy to pay 100% of the estimated cost of interconnection before the Company performed any additional interconnection cost studies or performed any other work relating to the Exergy

projects interconnection. However, Idaho Power did not require Exergy to post the full 100%. The Company continued with the 4 step study process described above and requested that Exergy post refundable deposits for subsequent studies. Idaho Power's request to Exergy is consistent with the process Idaho Power follows for all interconnection requests. Idaho Power only asks for advance payment for studies and facilities as necessary to minimize the risk that the Company will not be able to recover its costs from the developer if the developer changes its mind about moving forward with the project.

10. In essence, the Company requests that estimated interconnection costs be paid in installments. The early installments are for the cost of performing transmission engineering and design studies. Later installments might require advance payment for long lead time equipment. Final installments would be due prior to the Company commencing actual construction and installation of facilities.

11. Nothing in Schedule 72 prohibits the Company from requesting that payment of the estimated cost of interconnection be made in installments. In fact, requesting that QFs pay interconnection costs in installments, based on the actual costs Idaho Power will incur as each phase of the work is performed, is consistent with prior Commission orders. In 2002, the Commission approved certain modifications to Schedule 72. The Commission approved the Company's proposed modifications in Order No. 29092, issued in Case No. IPC-E-01-31. In that Order the Commission stated:

Regarding interconnection cost responsibility, we find that it is important for the tariff to explicitly state that all interconnection costs will be borne by the customer-generator. If interconnection requires more than the customer-furnished standard equipment, it is the customer-generator's responsibility to bear those additional interconnection expenses. We appreciate the QF's desire for certainty. We

put the Company on notice that should it abuse its discretion in interconnect matters and thwart the development of non-utility generation, the Commission will entertain a complaint and revisit the issue.

Idaho Power believes that allowing QFs to “pay as you go” and only take deposits as costs are expected to be incurred is consistent with the Commission’s mandate in Order No. 29092 that Idaho Power manage the interconnection process under Schedule 72 in a way that is fair to QF developers.

**The FERC Interconnection Management Process is Compatible With Schedule 72**

12. In its Motion, Exergy concludes, without citing legal or factual bases, that Idaho Power’s practice of using FERC’s rules for processing interconnection requests is inconsistent with Schedule 72.

The fragrant (sic) and blatant disregard of this Commission’s “exclusive jurisdiction” over interconnections in favor of a foreign tribunal’s rules threatens the very integrity of this Commission’s orders and authority over its regulated utilities. Permitting Idaho Power to unilaterally disregard its Schedule 72 would set a dangerous precedent. This is precisely the type of self-serving deviation from published rates and schedules that the filed rate doctrine prohibits. Even if the result appears harsh, the filed rate doctrine does not permit a utility to simply ignore its tariffs. (Brief in Support of Motion pp. 6-7).

Exergy’s spirited defense of the Commission’s authority is unnecessary. Idaho Power is not relying on FERC’s authority as justification for collecting deposits from Exergy. The Company does not need to rely on FERC’s authority. The plain language in Schedule 72 provides the Company with all the authority it needs to collect deposits to protect customers.

The benefit of applying FERC’s interconnection study process is the uniformity and consistency that it provides. Utilizing FERC’s four stage interconnection study process and the FERC’s rules for managing the QF interconnection queue is completely compatible and

consistent with the terms of Schedule 72. The intent of both FERC's interconnection process and the interconnection process in Schedule 72 are identical. They both are intended to provide generation developers with (1) interconnection cost estimates they can use to assess the viability of their respective generation projects; and (2) to increase the likelihood that Idaho Power will be able to collect the costs it incurs for interconnecting independent generation projects including the costs of engineering and design of interconnection facilities.

**The Filed Rate Doctrine is Irrelevant Under the Facts of this Case**

13. A significant portion of Exergy's brief is devoted to a discussion of the Filed Rate Doctrine. Idaho Power does not understand how Exergy concludes that the Company's requests for deposits from Exergy violate the filed rate doctrine. If it is Exergy's position that Idaho Power has never given Exergy an estimate of the cost of interconnection its projects, and therefore the filed rate doctrine precludes the Company from requiring a deposit, Exergy is incorrect on the facts. As Exhibits 1-5 demonstrate, Idaho Power has in fact provided Exergy with initial interconnection cost estimates and is in full compliance with Schedule 72 even as interpreted by Exergy. As a result the filed rate doctrine would not be applicable to the facts in this case.

14. If Exergy is arguing that the filed rate doctrine precludes Idaho Power from relying on FERC's interconnection queue management rules as support for its request for deposits from Exergy, again, the facts do not support Exergy's assertions. Idaho Power derives its authority to request deposits from Exergy on the Commission-approved terms and conditions of Schedule 72, not from the FERC's rules. The FERC rules are consistent

with Schedule 72 but the Company is not relying on them as support for its authority to collect deposits and/or prepayments for interconnection study costs.

15. In its filed rate doctrine discussion in its Brief, Exergy points out that the word “deposit” is not used in Schedule 72. Exergy is correct in that regard. But in reading Schedule 72, it is clear that Exergy’s reliance on the lack of the word “deposit” as support for its filed rate doctrine claim is misplaced. Under Schedule 72, Idaho Power is permitted to recover all of the costs of interconnecting a QF generation facility to the Company’s system. Under Schedule 72 Idaho Power can require payment of the estimated cost of interconnecting the QF generation facility prior to the Company performing any work associated with the interconnection facilities. Nothing in Schedule 72 precludes Idaho Power from taking payments for interconnection facilities in installments. Schedule 72 further provides that upon completion of the construction of the interconnection facilities, the actual cost will be reconciled against the estimated cost previously paid by the Seller and the appropriate billing or refund will be processed. Because the QF is making payments prior to performance of the actual work, calling this payment a “deposit” or an “installment payment” or an “advance” or a “prepayment” does not change the fact that Idaho Power is authorized under Schedule 72 to collect monies in anticipation of performing work associated with the Seller’s interconnection and is authorized to apply the early payment to the final bill.

16. Exergy’s failure to acknowledge the fact that any payments its makes will be applied to actual expenditures incurred by Idaho Power, is telling. A pre-payment to be applied to a final bill is a “deposit”. Idaho Power does not believe that any reasonable reading of Schedule 72 would support a requirement that Idaho Power perform time-

consuming and expensive interconnection studies without first requiring that Exergy provide some security that the Company could utilize to offset costs if Exergy decides not to proceed with the project. To interpret the filed rate doctrine to allow a developer to avoid providing security for its performance simply because the word “deposit” is not used in Schedule 72 would be the ultimate triumph of form over substance.

**It is Unfair to Allow Exergy to Maintain its Position in the Generation Interconnection Queue Without Following the Rules**

17. The second item in Exergy’s Motion is a request that the Commission require Idaho Power to provide Exergy with estimates of interconnection costs for Exergy’s QF projects without first requiring a deposit. Exergy argues that this request is reasonable because Idaho Power has not provided Exergy with any interconnection cost estimate so it is precluded under Schedule 72 from collecting any deposits. As Idaho Power has noted previously, Exergy is not correctly stating the facts. But even if it was, fundamental fairness dictates that the Commission deny Exergy’s request. Since 2000, Idaho Power has received more than 200 requests for interconnection. In each instance, Idaho Power has requested, and received deposits to offset engineering and design expense and to ensure that customers have some measure of protection from losses if a developer decides to abandon its generation project in mid-stream. Exergy’s request that it be permitted to obtain cost estimates for interconnecting its QF projects without first paying a deposit, would certainly be discriminatory and preferential treatment vis-à-vis all other generation project developers maintaining a position in Idaho Power’s interconnection queue.

18. This potential for discrimination is exacerbated by the fact that all but one of Exergy’s projects at issue in this Complaint are included in the Twin Falls cluster which is

the subject of the Commission's recent Order No. 30414 in Case No. IPC-E-06-21, the Cassia Windfarm case. As the Commission knows from that proceeding, the costs of interconnection for all of the participants in the Twin Falls cluster are dependent on whether or not other projects ahead of them in the queue proceed to development. By remaining in the Twin Falls' queue without providing deposits in the same manner that other queue participants have provided them, the Exergy projects have created uncertainty and have imposed a financial disadvantage on the other participants in the queue. The Commission should not facilitate this kind of gamesmanship.<sup>1</sup>

**Exergy Should be Charged the Correct Interconnection Deposit Amounts**

19. In its Alternative Motion, Exergy argues that even if the Commission ultimately determines that Idaho Power has acted in accordance with Schedule 72 and has appropriately requested that Exergy pay deposits for interconnection costs, that Idaho Power should not be permitted to charge the amount Idaho Power has requested from Exergy. Exergy argues that it is entitled to pay the amount that Idaho Power erroneously included in the sample study agreements posted on its website. The Company has acknowledged that as a result of a clerical error, the Company's example study agreements posted on its website contained incorrect deposit amounts. As the Company noted in its Answer to the Complaint, the example agreements have now been corrected and the erroneous deposit amounts have been removed from the example agreements.

20. Exergy's argument that it should be permitted to rely on Idaho Power's FERC-required website posting is simply another part of its effort to "game" the system in

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<sup>1</sup> It should be noted that Exergy has provided Feasibility Study deposits and some System Impact Study deposits in the past. It is only recently that it has decided not to pay the higher deposits required to proceed further in the interconnection study process.

order to gain an advantage over other QF developers in the interconnection queue. Other developers have not expressed confusion as to what their current deposit amounts should be.

21. Exergy's argument is at odds with its prior assertions regarding the Application of Schedule 72 to Idaho Power's interconnections with QFs. Previously, Exergy argued that application of the FERC process, which includes the requirement that sample study agreements be posted on the Company's website, could not, as a matter of law, be binding on QF projects like Exergy's projects. But here, Exergy argues that postings on the FERC-required website are binding on Idaho Power. Exergy cannot have it both ways.

#### **Exergy Misinterpreted Idaho Power's Reference to Credit Rating**

22. In its Motion, Exergy is critical of Idaho Power's references to credit rating in the Company's discussion of why it requires deposits for interconnection studies. In light of Exergy's response in its Brief it is apparent that Idaho Power was not as clear as it should have been in its discussion in its Answer to the Complaint of the role that credit plays in determining requests for deposit for interconnection studies. It was Idaho Power's intention in referring to credit rating in its Answer to the Complaint to make sure Exergy and the Commission understood that an interconnection customer with a good credit rating would not have to post cash deposits for interconnection studies. It is true that under the Commission's prior orders regarding security for QF projects, the Company cannot require a QF developer to demonstrate good credit or provide any credit information to the Company. However, that does not mean that a QF developer like Exergy could not, if it has good credit, avoid the need to provide Idaho Power with cash deposits for

interconnection studies.

**Idaho Power has Provided Exergy With Reasonable Cost Verification**

23. In its Motion Exergy urges the Commission to require Idaho Power to “provide Exergy with a detailed explanation and accounting of how the Company has spent all deposited monies to date.”

24. For the Commission’s information, for each generation interconnection project, QF or otherwise, for which a deposit is taken, Idaho Power establishes a separate accounting work order. As interconnection studies proceed, charges for engineering, design services and materials are charged to the work order and the deposit amount is applied to those charges.

25. For all of the Exergy projects that are the subject of the Complaint, Idaho Power has provided Exergy with a time and materials invoice. At Exergy’s request, Idaho Power has also provided Exergy with additional backup data in support of the invoices. Idaho Power is uncertain as to how much more detail it can provide Exergy above and beyond the detail that has already been provided to Exergy. Nevertheless, Idaho Power is willing to work with Exergy to see if it can address Exergy’s desire for more information. However, as previously noted, Idaho Power is concerned that this portion of Exergy’s Complaint could be used as an excuse to further delay Exergy’s payment of the required deposits thereby allowing Exergy to maintain its position in the interconnection queue to the disadvantage of other queue participants who have provided the deposits requested by the Company.

26. To avoid even the appearance that Exergy is “gaming” the complaint process, Idaho Power believes that it would be appropriate for the Commission to order

Exergy to make the required deposit payments. If a subsequent review of the available cost information Exergy desires to review, reveals that Idaho Power somehow requested deposit payments prematurely, then Exergy should be paid interest on such amounts. Again, it is important to remember that these payments are deposits and will ultimately be applied to costs the Company incurs to interconnect Exergy's QF projects.

### **Conclusion**

For all the reasons set forth above, the Commission should issue its order as follows:

1. Denying Exergy's motion for an order compelling Idaho Power to retain Exergy's projects in its interconnection queue. Instead the Commission shall issue its order authorizing Idaho Power to remove Exergy's projects from the interconnection queue unless Exergy posts the required deposits within a reasonable period of time. Idaho Power suggests fourteen (14) days from the date of the Commission's order would be reasonable;
2. Denying Exergy's other requests for relief contained in both the Motion and the Alternative Motion;
3. With respect to those portions of Exergy's Motion in which it demands that the Company provide additional accounting information and cost breakdowns for how Idaho Power has spent the monies Exergy has previously deposited with the Company, Idaho Power requests that the Commission order Exergy to first make the required deposit payments and if the Commission subsequently determines that Idaho Power requested deposit payments unreasonably or prematurely, that Exergy be paid interest on such amounts.

Respectfully submitted this 26th day of September 2007.

A handwritten signature in black ink, appearing to read 'B. L. Kline', written over a horizontal line.

BARTON L. KLINE  
Attorney for Idaho Power Company

## CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 26<sup>th</sup> day of September 2007, I served a true and correct copy of the within and foregoing upon the following named parties by the method indicated below, and addressed to the following:

Scott Woodbury  
Idaho Public Utilities Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, Idaho 83702

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Facsimile
- Email: [scott.woodbury@puc.idaho.gov](mailto:scott.woodbury@puc.idaho.gov)

Peter J. Richardson  
Richardson & O'Leary  
515 N. 27<sup>th</sup> Street  
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- U.S. Mail
- Overnight Mail
- FAX
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BARTON L. KLINE

**BEFORE THE IDAHO PUBLIC UTILITIES  
COMMISSION**

**CASE NO. IPC-E-07-13**

**IDAHO POWER COMPANY**

**ATTACHMENT 1**

**GENERATOR INTERCONNECTION  
FEASIBILITY STUDY**

for integration of the proposed

**GOLDEN VALLEY WIND PARK PROJECT**

in

**CASSIA COUNTY, IDAHO**

to the

**IDAHO POWER COMPANY ELECTRICAL SYSTEM**

for

**EXERGY DEVELOPMENT GROUP, LLC**

the

**INTERCONNECTION CUSTOMER**

**FINAL REPORT**

**January 3, 2007**

## **1.0 Introduction**

Exergy Development Group, LLC has contracted with Idaho Power Company (IPC) to perform a Generator Interconnection Feasibility Study for the integration of the proposed 11.62 MW Golden Valley Wind Park Project (project #155). The location of the project is in Idaho Power's southern Idaho service territory in sections 29 and 32 of T11S, R22E of Cassia County. This location starts approximately ½ mile west of Idaho Power's existing Golden Valley substation.

This report documents the basis for and the results of this Feasibility Study for the Golden Valley Wind Park. It describes the proposed project, the study cases used, the impact of associated projects, and results of all work in the areas of concern.

## **2.0 Summary**

The proposed project is an 11.62 MW wind farm consisting of seven 1.5 MW GE wind turbines. This wind farm will interconnect with the IPC system at about 600 S. and 560 W. in Cassia County, Idaho.

The transmission system serving this area is Idaho Power's 69 kV Golden Valley loop. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on the existing 69 kV transmission line in the immediate area to serve this project. However, this study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Therefore, a System Impact Study will be required to determine the transmission upgrades needed to serve this project.

The substation serving this area is the Golden Valley (GNVY) Substation. Two feeder breakers at GNVY Substation will have to be upgraded to connect the proposed project.

The distribution feeder serving this area is GNVY-013. Upgrades on the feeder will be necessary to serve this project.

The estimated cost of all required upgrades is \$333,000.

The existing feeder can accept up to 8.77 MVA of generation at the point of interconnection before feeder reconductoring is required.

## **3.0 Scope of Interconnection Feasibility Study**

The Interconnection Feasibility Study was done and prepared in accordance with Idaho Power Company Standard Generator Interconnection Procedures, to provide a preliminary evaluation of the feasibility of the interconnection of the proposed generating project to the Idaho Power system. All other proposed Generation projects prior to this project in the Generator

Interconnect queue were considered in this study. A current list of these projects can be found on the Idaho Power web site as follows:

Small Generator (<20 MW):

<http://www.idahopower.com/aboutus/business/generationInterconnect/generationInterconnect.cfm>

Large Generator ( $\geq$ 20 MW):

<http://www.oatioasis.com/ipco/index.html>.

#### **4.0 Description of Proposed Generating Project**

The Golden Valley Wind Park proposes to connect to the Idaho Power distribution system for an injection of 11.62 MW (maximum project output) using seven GE 1.5 MW wind turbines.

#### **5.0 Description of Existing Transmission Facilities**

The transmission system serving this area is Idaho Power's 69 kV Golden Valley loop. This system serves the area south of Burley and is configured as a loop with an open point in the middle, effectively making it two radial lines. The conductor on the affected portion of the system is 397 ACSR, which has a continuous thermal operating rating of 71.8 MVA. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on this particular line to serve this project. However, the study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Because of these limitations, a Transmission System Impact Study will be required to determine the next upgrades required to add this project. An existing study is attached as Appendix C. This study details the existing system limitations and describes the improvements necessary to increase the capacity of this system another 305 MW. However, this proposed capacity is already committed to other proposed generation projects currently ahead of this one in the queue. The proposed study will determine the additional work necessary to integrate this project into the Idaho Power system.

#### **6.0 Description of Existing Substation Facilities**

The substation serving this area is Idaho Power's Golden Valley (GNVY) Substation, which is located at 600 S. and 500 W. in Cassia County. The existing substation transformer is a 69:12.5 kV transformer rated for 14.0 MVA. With the consideration of the size of the proposed project there is adequate capacity in this substation to serve this project.

The feeder breaker on the feeder serving this project, Golden Valley 13 (GNVY-013), is a Pacific Electric (manufactured by Federal Pacific Electric) type "JCE 22" breaker designed for 600 amps continuous load current and has a maximum fault current interrupting rating of 10,000 amps. Initial studies indicate that there is adequate load and short circuit interrupting capability on this breaker to add the wind park. However, these studies also indicate that the addition of the wind park will cause the feeder breakers on the adjacent feeders, GNVY-011 and GNVY-012, to

**BEFORE THE IDAHO PUBLIC UTILITIES  
COMMISSION**

**CASE NO. IPC-E-07-13**

**IDAHO POWER COMPANY**

**ATTACHMENT 2**

**GENERATOR INTERCONNECTION  
FEASIBILITY STUDY**

for integration of the proposed

**LAVA BEDS WIND PARK PROJECT**

in

**BINGHAM COUNTY, IDAHO**

to the

**IDAHO POWER COMPANY ELECTRICAL SYSTEM**

for

**EXERGY DEVELOPMENT GROUP, LLC**

the

**INTERCONNECTION CUSTOMER**

**FINAL REPORT**

**January 3, 2007**

## 1.0 Introduction

Exergy Development Group, LLC has contracted with Idaho Power Company (IPC) to perform a Generator Interconnection Feasibility Study for the integration of the proposed 19.92 MW Lava Beds Wind Park Project (project #156). The proposed location of the project is in Idaho Power's eastern Idaho service territory in sections 14, 22, 23, 26, 27, 34 and 35 of T1S, R32E and sections 2 and 3 of T2S, R32E of Bingham County, Idaho. The proposed Point of Interconnection, selected by Idaho Power for purposes of defining the scope of this study, is the corner of 800 N. and 1900 W., which is the location of Idaho Power's existing Taber substation.

This report documents the basis for and the results of this Feasibility Study for the Lava Beds Wind Park. It describes the proposed project, the impact of associated projects, and results of all work in the areas of concern.

## 2.0 Summary

The proposed project is a 19.92 MW wind farm consisting of twelve or thirteen 1.5 MW GE wind turbines. This wind farm will interconnect with the IPC system at about 800 N. and 1900 W. in Bingham County, Idaho.

The transmission system serving this area is Idaho Power's 46 kV system north of Pingree. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on either of the two existing transmission lines in the immediate area to serve this project. However, this study has identified limitations in the Borah West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. A System Impact Study will be required to determine the transmission upgrades needed to serve this project.

The substation serving this area is the Haven (HAVN) substation. The Load Tap Changer (LTC) at this substation will have to be reprogrammed to serve the proposed project.

One of the distribution feeders serving this area is HAVN-042. Initial studies indicate that this feeder can accept up to 19.0 MW of generation as long as the wind park generates at a 0.95 lagging power factor. This is required to maintain adequate voltage on the feeder during light load conditions. A capacitor bank will also be required at the substation. If these special operating instructions, which are described further in Section 7, can be met then HAVN-042 has thermal capacity at the proposed point of interconnection to serve this project. If not, the required upgrades are listed in Section 8.

A generation interconnection package will be required at the point of interconnection. Grounding requirements and other acceptability requirements are found in Appendix A.

The estimated cost of all known required upgrades is \$270,000.

### **3.0 Scope of Interconnection Feasibility Study**

The Interconnection Feasibility Study was done and prepared in accordance with Idaho Power Company Standard Generator Interconnection Procedures, to provide a preliminary evaluation of the feasibility of the interconnection of the proposed generating project to the Idaho Power system. All other proposed Generation projects prior to this project in the Generator Interconnect queue were considered in this study. A current list of these projects can be found on the Idaho Power web site as follows:

Small Generator (<20 MW):

<http://www.idahopower.com/aboutus/business/generationInterconnect/generationInterconnect.cfm>

Large Generator ( $\geq$ 20 MW):

<http://www.oatioasis.com/ipco/index.html>.

### **4.0 Description of Proposed Generating Project**

The Lava Beds Wind Park proposes to connect to the Idaho Power distribution system for an injection of 19.92 MW (maximum project output) using twelve or thirteen GE 1.5 MW wind turbines.

### **5.0 Description of Existing Transmission Facilities**

The transmission system serving this area is Idaho Power's 46 kV system which sources out of Pingree Substation. Power is delivered to Pingree Substation at 138 kV, where it is transformed to 46 kV. From Pingree there are two 46 kV lines north to the area of the project. Line #154 from Pingree substation to Taber substation is part of the Blackfoot – Pingree 46 kV system. The first 8 miles from Pingree to Rockford are 2/0 ACSR conductor, and the remaining 11 miles to Taber Substation are 4/0 ACSR conductor. At 46 kV, 2/0 ACSR is rated for 22.8 MVA and 4/0 ACSR is rated for 29.7 MVA.

The second line serving the area of the wind park is line #446 from Pingree Substation to Haven Substation. This line is built to 138 kV standards but is currently energized at 46 kV. The conductor on this line is 397 ACSR, which has a continuous thermal rating of 47.8 MVA at 46 kV. This line, as well as Haven Substation, is currently scheduled to be converted to 138 kV by May 1, 2007.

With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on either of these existing transmission lines to serve this project. However, the study has identified limitations in the Borah West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Because of these limitations, a Transmission System Impact Study will be required to determine the upgrades required to integrate this project into the Idaho Power system.

**BEFORE THE IDAHO PUBLIC UTILITIES  
COMMISSION**

**CASE NO. IPC-E-07-13**

**IDAHO POWER COMPANY**

**ATTACHMENT 3**

**GENERATOR INTERCONNECTION  
FEASIBILITY STUDY**

for integration of the proposed

**MILNER DAM WIND PARK PROJECT**

in

**TWIN FALLS COUNTY, IDAHO**

to the

**IDAHO POWER COMPANY ELECTRICAL SYSTEM**

for

**EXERGY DEVELOPMENT GROUP, LLC**

the

**INTERCONNECTION CUSTOMER**

**FINAL REPORT**

**January 3, 2007**

## 1.0 Introduction

Exergy Development Group, LLC has contracted with Idaho Power Company (IPC) to perform a Generator Interconnection Feasibility Study for the integration of the proposed 19.92 MW Milner Dam Wind Park Project (project #157). The location of the project is in Idaho Power's southern Idaho service territory in portions of sections 25, 26 and 35 of T10S, R20E and section 30 of T10S, R21E in Twin Falls County, Idaho. This location starts approximately 2 miles west of Idaho Power's existing Milner substation.

This report documents the basis for and the results of this Feasibility Study for the Milner Dam Wind Park. It describes the proposed project, the study cases used, the impact of associated projects, and results of all work in the areas of concern.

## 2.0 Summary

The proposed project is a 19.92 MW wind farm consisting of twelve 1.5 MW GE wind turbines. The proposed point of interconnection for the wind farm with the IPC system is on the east edge of section 25 about 0.4 miles north of the intersection of Milner Road and 1300 W. (Cassia County coordinates).

This area is served by Idaho Power's 138 kV transmission system. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on the existing system in the immediate area to serve this project. However, this study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Therefore, a System Impact Study will be required to determine the transmission upgrades needed to serve this project.

The substation serving this area is the Milner (MLNR) Substation. Capacity at the substation will need to be increased by adding a second transformer into an existing bay and opening the substation bus so that only the feeder with the wind park is on this transformer.

The distribution feeder serving this area is Milner 043 (MLNR-043). Upgrades to the feeder will be necessary to serve this project. About 0.9 miles of existing conductor will need to be upgraded and 1.5 miles of new line installed to the point of interconnection.

Since the wind park will be located along with Idaho Power customer loads, a generation interconnection package will be required at the point of interconnection.

The estimated cost of all required upgrades to serve the full project is \$1,987,000. Lead time is about 72 weeks.

The existing feeder can accept up to 15.4 MVA of generation at the point of interconnection before feeder and/or substation upgrades are required. The cost to do the necessary work is about \$481,000.

### **3.0 Scope of Interconnection Feasibility Study**

The Interconnection Feasibility Study was done and prepared in accordance with Idaho Power Company Standard Generator Interconnection Procedures, to provide a preliminary evaluation of the feasibility of the interconnection of the proposed generating project to the Idaho Power system. All other proposed Generation projects prior to this project in the Generator Interconnect queue were considered in this study. A current list of these projects can be found on the Idaho Power web site as follows:

Small Generator (<20 MW):

<http://www.idahopower.com/aboutus/business/generationInterconnect/generationInterconnect.cfm>

Large Generator ( $\geq 20$  MW):

<http://www.oatioasis.com/ipco/index.html>.

### **4.0 Description of Proposed Generating Project**

The Milner Dam Wind Park proposes to connect to the Idaho Power distribution system for an injection of 19.92 MW (maximum project output) using twelve General Electric 1.5 MW wind turbines.

### **5.0 Description of Existing Transmission Facilities**

This area is served by Idaho Power's 138 kV transmission system. There are several 138 kV lines that connect to Milner substation, as well as 69 kV and 46 kV transmission lines that leave the Milner substation and serve the surrounding area. With the consideration of other existing and proposed generation projects in the queue ahead of this project there is adequate capacity available on this particular part of the system to serve this project. However, the study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Because of these limitations, a Transmission System Impact Study will be required to determine the next upgrades required to add this project. An existing study is attached as Appendix C. This study details the existing system limitations and describes the improvements necessary to increase the capacity of this system another 305 MW. However, this capacity is already committed to other proposed generation projects currently ahead of this one in the queue. The proposed study will determine the additional work necessary to integrate this project into the Idaho Power system.

### **6.0 Description of Existing Substation Facilities**

The substation serving this area is Idaho Power's Milner (MLNR) Substation, which is located at about 5260 E. and Milner Road in Twin Falls County. The existing substation transformer is a 138:34.5 kV transformer rated for 28.0 MVA. With the consideration of the size of the proposed project, as well as other existing and proposed generation projects in the queue ahead of this

**BEFORE THE IDAHO PUBLIC UTILITIES  
COMMISSION**

**CASE NO. IPC-E-07-13**

**IDAHO POWER COMPANY**

**ATTACHMENT 4**

**GENERATOR INTERCONNECTION  
FEASIBILITY STUDY**

for integration of the proposed

**NOTCH BUTTE WIND PARK PROJECT**

in

**JEROME AND/OR LINCOLN COUNTIES, IDAHO**

to the

**IDAHO POWER COMPANY ELECTRICAL SYSTEM**

for

**EXERGY DEVELOPMENT GROUP, LLC**

the

**INTERCONNECTION CUSTOMER**

**FINAL REPORT**

**January 3, 2007**

## 1.0 Introduction

Exergy Development Group, LLC has contracted with Idaho Power Company (IPC) to perform a Generator Interconnection Feasibility Study for the integration of his new 19.92 MW Notch Butte Wind Park Project (project #158). The proposed location of the project is in Idaho Power's southern Idaho service territory in section 36 of T6S, R16E and sections 30,31,32 of T6S, R17E of Lincoln County as well as sections 3,4,5,6,8,9 of T7S, R17E of Jerome County. This location starts approximately 1 mile north or west of Idaho Power's existing Notch Butte substation.

This report documents the basis for and the results of this Feasibility Study for the Notch Butte Wind Park. It describes the proposed project, the study cases used, the impact of associated projects, and results of all work in the areas of concern.

## 2.0 Summary

The proposed project is a 19.92 MW wind park consisting of twelve 1.5 MW wind turbines. This wind farm will interconnect with the IPC system at about 900 N. and 200 E. in Jerome County, Idaho.

The transmission line serving this area is Idaho Power's Twin Falls – Hydra - Midpoint 138 kV line. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on this line to serve this project. However, this study has identified limitations in the 138 kV transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering the projects in the generation queue. Therefore, a System Impact Study will be required to determine the transmission upgrades needed to serve this project.

The substation serving this area is Idaho Power's Notch Butte (NHBT) substation. With the consideration of the size of the proposed project there is not adequate capacity in this substation to serve this project. A second substation transformer will be required.

The distribution feeder serving this area is the Notch Butte 011 (NHBT-011) 12.5 kV feeder. With the consideration of the size of the proposed project there is not adequate capacity on this feeder to serve this project. A new 34.5 kV feeder will be required to serve this project. About 4 miles of the existing feeder will be rebuilt as a double circuit line, with the top circuit being a 34.5 kV feeder for the wind park.

Since the wind park could be located along with other Idaho Power customers, a generation interconnection package will be required at the point of interconnection.

The estimated cost of all required upgrades is \$2,114,000. Lead time is about 72 weeks.

The existing feeder can accept up to 3.82 MVA of generation at the point of interconnection before feeder reconductoring is required.

### **3.0 Scope of Interconnection Feasibility Study**

The Interconnection Feasibility Study was done and prepared in accordance with Idaho Power Company Standard Generator Interconnection Procedures, to provide a preliminary evaluation of the feasibility of the interconnection of the proposed generating project to the Idaho Power system. All other proposed Generation projects prior to this project in the Generator Interconnect queue were considered in this study. A current list of these projects can be found on the Idaho Power web site as follows:

Small Generator (<20 MW):

<http://www.idahopower.com/aboutus/business/generationInterconnect/generationInterconnect.cfm>

Large Generator ( $\geq 20$  MW):

<http://www.oatioasis.com/ipco/index.html>.

Because of the nature of these projects, this study was performed using the best-known information available as of this date.

### **4.0 Description of Proposed Generating Project**

The Notch Butte Wind Park proposes to connect to the Idaho Power distribution system for an injection of 19.92 MW (maximum project output) using twelve GE 1500 kW sle model wind turbines.

### **5.0 Description of Existing Transmission Facilities**

The transmission line serving this area is Idaho Power's Twin Falls – Hydra - Midpoint 138 kV line. This line is a 22.85 mile 138 kV line with both 715 and 795 ACSR conductors, which has a continuous thermal operating rating of 206.9 MVA. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on this particular line to serve this project. However, the study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Because of these limitations, a Transmission System Impact Study will be required to determine the next upgrades required to add this project. An existing study is attached as Appendix C. This study details the existing system limitations and describes the improvements necessary to increase the capacity of this system another 305 MW. However, this proposed capacity is already committed to other proposed generation projects currently ahead of this one in the queue. The proposed study will determine the additional work necessary to integrate this project into the Idaho Power system.

### **6.0 Description of Existing Substation Facilities**

The substation serving this area is Idaho Power's Notch Butte (NHBT) substation, which is located at 700 N. and 400 E. in Jerome County. The existing substation transformer is a

**BEFORE THE IDAHO PUBLIC UTILITIES  
COMMISSION**

**CASE NO. IPC-E-07-13**

**IDAHO POWER COMPANY**

**ATTACHMENT 5**

**GENERATOR INTERCONNECTION  
FEASIBILITY STUDY**

for integration of the proposed

**SALMON FALLS WIND PARK PROJECT**

in

**TWIN FALLS COUNTY, IDAHO**

to the

**IDAHO POWER COMPANY ELECTRICAL SYSTEM**

for

**EXERGY DEVELOPMENT GROUP, LLC**

the

**INTERCONNECTION CUSTOMER**

**FINAL REPORT**

**January 3, 2007**

## 1.0 Introduction

Exergy Development Group, LLC has contracted with Idaho Power Company (IPC) to perform a Generator Interconnection Feasibility Study for the integration of the new 19.92 MW Salmon Falls Wind Park Project (project #159). There were two proposed locations for this project. The area that was studied is in Idaho Power's southern Idaho service territory in sections 11,12,13,14,15 of T8S, R13E and sections 7 and 18 of T8S, R14E of Twin Falls County. This location starts approximately 4 miles west of Idaho Power's existing Dale substation.

This report documents the basis for and the results of this Feasibility Study for the Salmon Falls Wind Park. It describes the proposed project, the study cases used, the impact of associated projects, and results of all work in the areas of concern.

## 2.0 Summary

The proposed project is a 19.92 MW wind park consisting of twelve to fourteen 1.5 MW wind turbines. This wind farm will interconnect with the IPC system at about 5100 N. and 900 E. in Twin Falls County, Idaho.

There are several transmission lines in this immediate area. Two transmission lines that could feasibly serve this project are the 46 kV transmission system serving Idaho Power's existing Thousand Springs Power Plant and the Upper Salmon "A" – Cliff 138 kV line. With the consideration of other proposed generation projects in the queue ahead of this project there is adequate capacity available on these lines to serve this project. However, the study has identified limitations in the Midpoint West transmission system to the west of this area. This study demonstrates that there is no available transmission capacity when considering other proposed generation projects ahead of this one in the queue. Because of these limitations, a Transmission System Impact Study will be required to determine the upgrade required to integrate this project into the Idaho Power system.

The substation serving the load in this area is Idaho Power's Dale (DALE) substation. With the consideration of the size of the proposed project there is adequate capacity in this substation to serve this project.

The distribution feeder serving this area is the Dale 43 (DALE-043) 34.5 kV feeder. With the consideration of the size of the proposed project there is not adequate thermal capacity on this feeder to serve this project. Preliminary studies also indicate that it would be difficult, if not impossible, to maintain adequate voltage to the existing customers on the Dale feeders with the addition of this project. Before this option is pursued further a Distribution System Impact Study will be required.

Two alternatives were evaluated. The first is to build a dedicated substation for the wind park and build a new 46 kV transmission line to an existing bay at the Thousand Springs Power Plant. The estimated cost of this option is \$2,300,000. Long lead items are estimated at 72 week delivery from the time of order.

The second alternative is to build a dedicated substation and connect to the 138 kV Upper Salmon – Cliff line. The estimated cost of this option is \$2,650,000. Long lead items are estimated at 72 week delivery from the time of order.

Initial studies indicate that there is adequate load and short circuit interrupting capability on all affected transmission breakers for either of these options.

### **3.0 Scope of Interconnection Feasibility Study**

The Interconnection Feasibility Study was done and prepared in accordance with Idaho Power Company Standard Generator Interconnection Procedures, to provide a preliminary evaluation of the feasibility of the interconnection of the proposed generating project to the Idaho Power system. All other proposed Generation projects prior to this project in the Generator Interconnect queue were considered in this study. A current list of these projects can be found on the Idaho Power web site as follows:

Small Generator (<20 MW):

<http://www.idahopower.com/aboutus/business/generationInterconnect/generationInterconnect.cfm>

Large Generator ( $\geq 20$  MW):

<http://www.oatioasis.com/ipco/index.html>.

Because of the nature of these projects, this study was performed using the best-known information available as to date.

### **4.0 Description of Proposed Generating Project**

The Salmon Falls Wind Park proposes to connect to the Idaho Power system for an injection of 19.92 MW (maximum project output) using twelve to fourteen GE 1500 kW SLE model wind turbines.

### **5.0 Description of Existing Transmission Facilities**

There are several transmission lines in this immediate area. The transmission line serving the DALE substation is Idaho Power's King - American Falls 138 kV line. This line is a 138 kV line with 715 ACSR "Starling" conductor, which has a continuous thermal operating rating of 207.8 MVA. Idaho Power's existing Thousand Springs Power Plant, which is located about 1 mile east of the project, is on the 46 kV transmission system. This system has 397.5 ACSR "Ibis" conductor, rated for 47.8 MVA, going from 1000 Springs Power to Hagerman substation and 2/0 Copper conductor, rated for 28.1 MVA, going from 1000 Springs Power to Dale substation. There is a 69 kV line east of the project that is limited in capacity by the substation transformer (see section 6.0 below). And finally the Upper Salmon "A" – Cliff 138 kV line runs through the proposed project. This line has 795 ACSR "Tern" conductor rated for 219.5 MVA. With the