

✓ Gen. Ack  
sent 1/8/09

✓ To A.V.

✓ To Commrs.  
H

(Note: Idaho Power has responded  
to his questions.)

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Jean Jewell

**From:** carlsonr@filertel.com  
**Sent:** Wednesday, January 07, 2009 9:39 AM  
**To:** Jean Jewell; Beverly Barker; Gene Fadness; Ed Howell  
**Subject:** PUC Comment Form

A Comment from Idaho Rural Council follows:

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Case Number: IPC-E-08-24  
Name: Idaho Rural Council  
Address: P.O. Box 21  
City: Filer  
State: Idaho  
Zip: 83328  
Daytime Telephone: 208-326-3686  
Contact E-Mail: [carlsonr@filertel.com](mailto:carlsonr@filertel.com)  
Name of Utility Company: Idaho Power  
Add to Mailing List: yes

Please describe your comment briefly:

The Idaho Rural Council is very supportive of Idaho Power's efforts to expand its renewable power portfolio and has encouraged all of its members to participate in the Green Power Program. However, before submitting our comments, we had several questions about the application. The questions below were submitted via e-mail to Lisa Nordstrom and Karl Bokenkamp on January 7, 2009 but have not elicited any response:

1. Is the request to "retire" Green Tags meant to cover just those IP sponsored project tags it has already produced or is the company's request meant to cover tags associated with future power production?
2. The application mentions 320,000 MWh of Green Tags obtained through generation at the Elkhorn Valley Wind Project in eastern Oregon in 2007 and 2008. What is the total number of Green Tags associated with past production that IP is seeking to retire? What is the estimated number of Green Tags IP has acquired (at least potentially) through its U.S. Geothermal affiliation?
3. IP apparently has questions about its ability to get the Elkhorn Green Tags certified by Green-e Energy making their value questionable. Why does IP perceive a problem with certification of those tags?
4. What was the total dollar value of Green Power Program contributions IP collected and passed through to the Bonneville Environmental Foundation (BEF) in 2007? What is the estimate of the pass through for 2008?
5. Voluntary contributions by Green Power Program participants that support IP's production of renewable power - even outside IP's service area- doesn't seem to us to be the same situation as the scenario from the 'Best Practices in Public Claims Related to Green Power Purchase and Sales' cited in the application. Could contributions from IP's Green Power Program participants be directed to the acquisition or lease of the Elkhorn Green Tags (instead of funneled through BEF) without conflicting with the Green-e Energy standards?

IRC requests that IPUC staff get answers to the above questions as part of its review and analysis.

IRC would also suggest that Idaho Power investigate the possibility of transferring Green Tags to a escrow or trust to be held for the benefit of its Green Power Program participants making voluntary contributions to the trust. This kind of arrangement might provide the company with a source of funds with which to invest in more renewable power generation AND achieve the same goals that retiring the Green Tags would.

Richard Carlson  
Attorney for Idaho Rural Council

The form submitted on <http://www.puc.idaho.gov/forms/ipuc1/ipuc.html>  
IP address is 208.98.172.26

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