

WILLIAMS · BRADBURY

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IDAHO PUBLIC
UTILITIES COMMISSION

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Re: IPC-E-11-10

Dear Ms. Jewell:

Please find enclosed an original and seven copies of the Motion for Extension of Time of Interconnect Solar Development, LLC for filing in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr
Enclosures

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Interconnect Solar

BEFORE THE IDAHO PUBLIC UTILITES COMMISSION

IN THE MATTER OF THE APPLICATION OF) Case No. IPC-E-11-10
IDAHO POWER COMPANY FOR A)
DETERMINATION REGARDING THE FIRM) **MOTION FOR EXTENSION OF**
ENERGY SALES AGREEMENT WITH) **TIME**
INTERCONNECT SOLAR DEVELOPMENT,)
LLC, FOR THE SALE AND PURCHASE OF)
ELECTRIC ENERGY.)
_____)

COMES NOW, Interconnect Solar Development, LLC (“Interconnect Solar” or “ISD”), by and through its counsel of record, Williams Bradbury, PC, and files this Motion for Extension of Time for Interconnect Solar and Idaho Power Company to resubmit a Firm Energy Sales Agreement (“FESA”) to the Idaho Public Utilities Commission (“Commission”), for the reasons stated below.

1. Order No. 32361 issued September 20, 2011 gave ISD and Idaho Power seven days, or until September 27, 2011, to resubmit the FESA with rates corrected for a computational error related to the escalation of the capacity component of avoided costs, after which the Commission would proceed with deliberations regarding approval or disapproval of the Agreement.

2. Interconnect Solar and Idaho Power have also identified a second computational error related to the capacity value of the Murphy Flats solar project,

resulting from a failure to correctly model summer hourly generation based on shift to daylight savings time. This error appears to largely accounts for the difference between the 36% capacity factor assigned by Idaho Power to the Project at the June 2010 system peak hour of 7:00 P.M, versus the 55% capacity valuation derived by Siemens for the same hour, using the PVSYST solar modeling program.

3. Correcting for this daylight savings time error requires Idaho Power to re-run its avoided cost model which the Company has agreed to do, on an expedited basis, with results expected on Monday, September 26, 2010.¹ However, there is the possibility that ISD and Idaho Power will not be able to turn the new modeled prices into a revised and fully executed FESA by September 27, 2010.

4. Following a meeting between Interconnect Solar and Idaho Power on Thursday, September 22, 2011 in which scheduling was discussed, ISD believes that a revised and executed FESA can be presented to the Commission on Thursday, September 29, 2010.

WHREFORE, Interconnect Solar requests that the Commission issue an order extending by two days, until September 29, 2011, the date by which Idaho Power and ISD resubmit their Firm Energy Sales Agreement with accurate avoided cost calculations.

DATED: This 23rd day of September, 2011.



/s/ Ronald L. Williams

Ronald L. Williams
Williams Bradbury P.C
Attorneys for Interconnect Solar Development, LLC

¹ This new mode run will also continue to correct for the capacity escalation error previously identified.

CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of August, 2011, a true and correct copy of the foregoing was served by the method indicated below, and addressed to the following:

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/s/ Ronald L. Williams