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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR A) CASE NO. IPC-E-11-10
DETERMINATION REGARDING THE FIRM)
ENERGY SALES AGREEMENT WITH) COMMISSION STAFF MOTION
INTERCONNECT SOLAR DEVELOPMENT,) TO EXTEND DEADLINE FOR
LLC, FOR THE SALE AND PURCHASE OF) FILING COMMENTS
ELECTRIC ENERGY.)**

On June 17, 2011, Idaho Power Company filed an Application with the Commission requesting acceptance or rejection of a 25-year Firm Energy Sales Agreement (Agreement) between Idaho Power and Interconnect Solar Development LLC (Interconnect Solar). On July 8, 2011, the Commission issued a Notice of Application and Notice of Modified Procedure setting a comment deadline of August 4, 2011. Idaho Power and Interconnect Solar were given until August 11, 2011, to file reply comments.

The Interconnect Solar Agreement is the first solar project to have rates calculated based on the IRP Methodology. Application of the IRP Methodology to a solar project raises new, unique issues, i.e., the introduction of heavy load peak pricing, separate calculation of energy and capacity rate components, and application of price adjustment mechanisms not typically used with the IRP Methodology. Staff's first set of production requests has triggered additional questions and the need for additional review. Staff expects to file at least one more

round of production requests. We anticipate that Idaho Power may require a full 21 days to compile its responses.

Based on the complexity of the issues presented in this case, and in order to provide Staff enough time to adequately review the Agreement, we request an extension for filing comments. We, therefore, propose the following modifications:

| | |
|-------------------------------------|--------------------|
| Staff comments due | September 29, 2011 |
| IdahoPower/Interconnect Solar reply | October 6, 2011 |

Staff respectfully requests that the Commission issue an Order approving the modified schedule.

Respectfully submitted this 28TH day of July 2011.



Kristine A. Sasser
Deputy Attorney General

N:IPC-E-11-10_Motion to Extend Comments_ks