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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 MODIFY 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, the Project). 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.

On July 28, 2011, Staff filed a Motion to Extend the original comment deadline. Staff indicated that, as the first solar project to have rates calculated based on the IRP Methodology, the Interconnect Solar Application raised new, unique issues that Staff needed additional time to review. Based on the issues presented by Staff, on August 2, 2011, the Commission issued an Order extending the comment deadline until September 29, 2011, and reply comment deadline until October 6, 2011. Order No. 32308.

On August 3, 2011, Interconnect Solar filed an Answer to Staff's Motion. While Interconnect Solar acknowledged receipt of Staff's Motion on Friday, July 29, 2011, the Project maintained that it did not have an opportunity to respond prior to the Commission granting Staff's Motion. Interconnect Solar explained that, while it did not oppose additional time for Staff to complete its investigation, it did oppose the extended schedule requested by Staff. Interconnect Solar argued that if Staff's schedule was adopted the project would no longer be commercially viable and would be forced into default in its contractual obligation to Idaho Power.

Following Interconnect Solar's Answer, Staff, the Project and Idaho Power have worked together to expedite discovery. Staff now believes that it has received adequate information to be prepared to file comments in advance of the September 29, 2011, deadline. We, therefore, propose the following modifications:

Staff comments due	September 9, 2011
IdahoPower/Interconnect Solar reply	September 16, 2011

Neither Interconnect Solar nor Idaho Power oppose Staff's Motion to Modify the comment deadlines.

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

Respectfully submitted this 25TH day of August 2011.



Kristine A. Sasser
Deputy Attorney General

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 25th DAY OF AUGUST 2011, SERVED THE FOREGOING **COMMISSION STAFF MOTION TO MODIFY DEADLINE FOR FILING COMMENTS**, IN CASE NO. IPC-E-11-10, BY E-MAILING AND MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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