

GIVENS PURSLEY LLP

LAW OFFICES

601 W. Bannock Street
PO Box 2720, Boise, Idaho 83701
TELEPHONE: 208 388-1200
FACSIMILE: 208 388-1300
WEBSITE: www.givenspursley.com

Deborah E. Nelson
den@givenspursley.com
(208) 388-1215

Gary G. Allen
Peter G. Barton
Christopher J. Beeson
Clint R. Bolinder
Erik J. Bolinder
Preston N. Carter
Jeremy C. Chou
William C. Cole
Michael C. Creamer
Amber N. Dina
Elizabeth M. Donick
Thomas E. Dvorak
Jeffrey C. Fereday
Martin C. Hendrickson
Don E. Krickrehm

Neal A. Koskella
Debora K. Kristensen
Michael P. Lawrence
Franklin G. Lee
David R. Lombardi
Emily L. McClure
Kenneth R. McConnell
Kelly Greene McConnell
Alex P. McLaughlin
Melodie A. McQuade*
Christopher H. Meyer
L. Edward Miller
Patrick J. Miller
Judson B. Montgomery
Deborah E. Nelson

W. Hugh O'Riordan, LL.M.
Angela M. Reed
Matt G. Smith
P. Mark Thompson
Jeffrey A. Warr
Robert B. White

Of Counsel
Kimberly D. Maloney

*Licensed in Virginia

Retired:
Kenneth L. Pursley
James A. McClure (1924-2011)
Raymond D. Givens (1917-2008)

December 20, 2013

VIA HAND DELIVERY

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

RE: *Idaho Wind Partners vs. Idaho Power Company*

Dear Jean:

Enclosed are an original and eight (8) copies of Idaho Wind Partners I, LLC's Answer to Idaho Power Company's Cross-Complaint in the above matter. Please conform a copy and return it with our courier.

Please do not hesitate to contact me if you have questions or concerns.

Sincerely,



Deborah E. Nelson

DEN/kml
Enclosures
1951701_1

RECEIVED
2013 DEC 20 PM 4:25
IDaho Public Utilities Commission

IPC-E-13-19

Deborah E. Nelson, ISB # 5711
Preston N. Carter, ISB # 8462
GIVENS PURSLEY LLP
601 W. Bannock St.
Post Office Box 2720
Boise, Idaho 83701-2720
Telephone: 208-388-1200
Facsimile: 208-388-1300
11067-18 1942657_14

RECEIVED
2013 DEC 20 PM 4: 25
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Idaho Wind Partners I, LLC

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IDAHO WIND PARTNERS I, LLC,

Complainant and Petitioner,

vs.

IDAHO POWER COMPANY,

Respondent.

Case No. IPC-E-13-19

**IDAHO WIND PARTNERS I, LLC'S
ANSWER TO IDAHO POWER
COMPANY'S CROSS-COMPLAINT**

INTRODUCTION AND RESPONSE

IDAHO WIND PARTNERS I, LLC ("IWP") answers Idaho Power Company's Cross-Complaint pursuant to Idaho Administrative Rule 31.01.01.57. IWP filed a Complaint and Petition for Declaratory Order ("Complaint and Petition") against Idaho Power Company ("Idaho Power") on October 25, 2013. The Complaint and Petition seeks interpretation and enforcement of certain 2005-era Firm Energy Sales Agreements ("FESAs") between Idaho Power and projects owned by IWP. Specifically, the Complaint and Petition seeks interpretation and enforcement of the FESAs' requirement that Idaho Power purchase Surplus Energy at a rate equal to the current month's "Market Energy Cost," defined as "Eight-five percent (85%) of the

weighted average of the daily on-peak and off-peak Dow Jones Mid-Columbia Index (Dow Jones Mid-C Index) prices for non-firm energy.” Complaint and Petition at 2.

Idaho Power filed an Answer and Cross-Complaint on or about November 29, 2013. The Answer generally denies IWP’s allegations that Idaho Power has failed to purchase Surplus Energy at Market Energy Cost. The Cross-Complaint contends that the Dow Jones Mid-C Index for non-firm energy has been discontinued and that there exists no Mid-C non-firm index other than Platts, the replacement publisher for the Dow Jones Mid-C Index. Idaho Power seeks an order directing IWP to accept the use of the Platts non-firm index as the replacement index for the calculation of Market Energy Cost in the FESAs.

Since the close of business on September 13, 2013, when Platts began publishing the Mid-C Index, Platts has not reported a single transaction volume. Because Idaho Power calculates Market Energy Price with reference only to those prices with a reported transaction volume, Idaho Power has paid zero dollars to IWP for all Surplus Energy delivered during that same timeframe. If the Commission permits Idaho Power to continue its calculation of Market Energy Cost while also imposing Platts as a replacement index, then IWP is threatened with the prospect of no payment for Surplus Energy for the entire remaining length of their contracts. This would result in millions of dollars in damages, in addition to the damages IWP has already suffered.

ANSWER

IWP answers the allegations in Idaho Power’s Cross-Complaint as follows. IWP denies any allegation not specifically admitted. IWP reserves the right to supplement this Answer if Idaho Power amends its Cross-Complaint or if new facts come to light.

In response to the first, unnumbered paragraph in the Cross-Complaint, IWP hereby incorporates the allegations in its Complaint that correspond to the statements Idaho Power

incorporates by reference. The remaining paragraphs of this Answer correspond to the numbered paragraphs in the Cross-Complaint.

1. IWP admits that Idaho Power sent a notice to the projects encompassed in IWP's Complaint and that the first page of each notice is attached to the Cross-Complaint as Attachment 1. IWP has attached the complete notices as Exhibits 1 through 8 to this Answer. As to any remaining allegations, the notices speak for themselves and no further response is required.

2. IWP admits that the relevant FESAs contain the language quoted in paragraph 2 of the Cross-Complaint. As to any remaining allegations, the FESAs speak for themselves and no further response is required.

3. IWP denies that there is no other Mid-C electric price index available for use. Idaho Power has agreed to, and the Commission has approved, the Intercontinental Exchange Mid-Columbia Index (ICE Mid-C Index) for use as the Market Energy Reference Price in a FESA with a wind producer. *See* Order 32125 (Nov. 24, 2010), IPC-E-10-24 (approving FESA between Idaho Power and Rockland Wind Project LLC).¹ In addition, upon information and belief, utilities in the region have requested to use Powerdex indexes to calculate market-based rates. For example, Avista has filed Tariff Advice No. ADV-13-06-E to define "Market Rate" in Avista Schedule 62 with reference to the Powerdex Real-Time Hourly Mid-Columbia Index.

4. IWP admits that it sent Idaho Power a letter on November 25, 2013, and that a copy of the letter is attached to the Cross-Complaint as Attachment 2. As to any remaining allegations, the letter speaks for itself and no further response is required.

¹ Section 1.30 of the Rockland FESA defines Mid-Columbia Market Energy Cost, in relevant part, as "Ninety percent (90%) of the monthly weighted average of the daily on-peak and off-peak Intercontinental Exchange Mid-Columbia Index (ICE Mid-C Index) prices for firm energy."

5. IWP admits that Idaho Power filed Tariff Advice No. 13-05 on October 24, 2013, and that through the Tariff Advice Idaho Power seeks, among other things, to amend Schedule 86 by adding “volume” before the words “weighted average.” IWP denies the Tariff Advice is mere “clarification” but, rather, believes it constitutes an amendment to Schedule 86. IWP denies that the Tariff Advice, if accepted, could affect interpretation of the FESAs because any amendment to Schedule 86 would operate prospectively only. As to any remaining allegations, the Tariff Advice No. 13-05 and related documents speak for themselves and no further response is required.

AFFIRMATIVE DEFENSES

1. Idaho Power’s Cross-Complaint fails to state a claim upon which relief may be granted.

2. The FESAs require that Idaho Power and IWP “mutually agree upon” a replacement for the Dow Jones Mid-C Index. FESAs ¶1.12. IWP does not agree to Platts as a replacement index if it is coupled with Idaho Power’s calculation of Market Energy Cost. However, IWP does not object to Platts as a replacement index, so long as the Commission orders Idaho Power to calculate Market Energy Price using the monthly average of all published daily prices, weighted by the number of on- and off-peak hours in the day.

PRAYER FOR RELIEF

IWP respectfully requests the Commission issue an Order:

A. Denying the relief sought by Idaho Power in the Prayer for Relief included in its Answer and Cross-Complaint and dismissing Idaho Power’s Cross-Complaint in its entirety;

B. Requiring that Idaho Power calculate Market Energy Cost consistent with the FESAs, namely by calculating the monthly average of all published daily prices, weighted by the number of on- and off-peak hours in the day;

- C. Granting the relief sought in IWP's Complaint; and
- D. Granting any other relief the Commission deems proper.

DATED this 20th day of December 2013.

GIVENS PURSLEY LLP

By: 
Deborah E. Nelson
Attorney for Idaho Wind Partners I, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have on this 20th day of December 2013, served the foregoing IDAHO WIND PARTNERS I, LLC'S ANSWER TO IDAHO POWER COMPANY'S CROSS-COMPLAINT upon all parties of record in this proceeding, by delivering an original and seven copies upon:

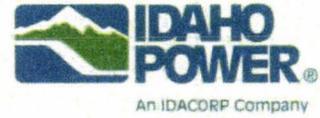
Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

And by mailing a copy thereof, properly addressed with postage prepaid, to:

Donovan E. Walker (dwalker@idahopower.com)
Julia A. Hilton (jhilton@idahopower.com)
Idaho Power Company
1221 W. Idaho St.
P.O. Box 70
Boise, ID 83702



Deborah E. Nelson



October 14, 2013

Tuana Gulch Wind Park LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049, 82 Elm Street
Manchester, VT 05255-

Re: Tuana Gulch Wind Park
Project Number: 31315065

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 1

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

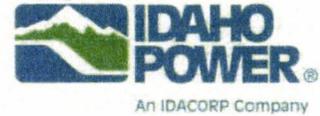
Transition Highlights

Effective after the close of business on Friday, September 13, 2013, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Golden Valley Wind Park, LLC Attn: Steven Eisenberg
c/o Idaho Wind Partners I, LLC
c/o RP Wind ID LLC
P.O. Box 2049 82 Elm Street
Manchester Center, VT 05255-

Re: Golden Valley Wind Park
Project Number: 31765160

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 2

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

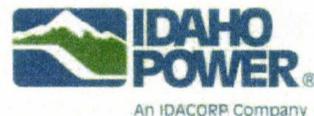
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Milner Dam Wind Park, LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049 82 Elm Street
Manchester Center, VT 05255-

Re: Milner Dam Wind
Project Number: 31720190

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 3

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

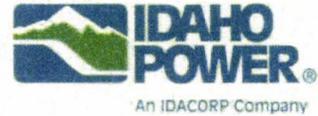
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Oregon Trail Wind Park, LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049, 82 Elm Street
Manchester City, VT 05255-

Re: Oregon Trail Wind Park
Project Number: 31315075

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 4

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

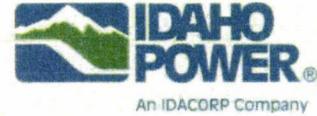
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Salmon Falls Wind Park, LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049, 82 Elm Street
Manchester Center, VT 05255-

Re: Salmon Falls Wind
Project Number: 31618100

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 5

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

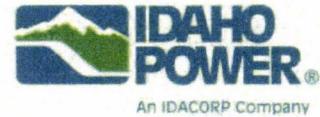
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Thousand Springs Wind Park, LLC - Attn Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049, 82 Elm Street
Manchester Center, VT 05255-

Re: Thousand Springs Wind Park
Project Number: 31315055

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 6

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

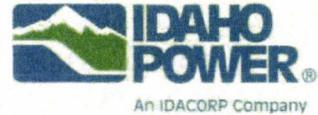
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Burley Butte Wind Park, LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners I, LLC
c/o RP Wind ID LLC
P.O. Box 2049 82 Elm Street
Manchester Center, VT 05255-

Re: Burley Butte Wind Park
Project Number: 31765170

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 7

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

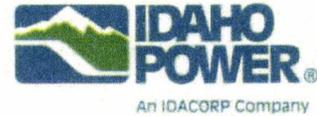
Transition Highlights

Effective after the close of business on **Friday, September 13, 2013**, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.



October 14, 2013

Pilgrim Stage Station Wind Park, LLC - Attn: Steven Eisenberg
c/o Idaho Wind Partners 1, LLC
c/o RP Wind ID LLC
P.O. Box 2049, 82 Elm Street
Manchester Center, VT 05255-

Re: Pilgrim Stage Station Wind Park
Project Number: 31315045

NON-FIRM MID C ELECTRICITY INDEX

PLEASE BE ADVISED: The energy sales agreement between your generation project and Idaho Power Company provides that in some circumstances the Non-Firm Mid C electricity index energy values are used to calculate the energy payments for your project. Historically these Non-Firm Mid C index values have been provided by Dow Jones. Idaho Power received notice regarding its subscription to the Dow Jones index from McGraw Hill Financial that as of close of business on Friday, September 13, 2013, the Dow Jones index will transition to Platts. Platts now provides the Non-Firm Mid C electricity index information that was previously provided by Dow Jones. (See attached notice)

Should you have any questions please contact:

Randy Allphin
Energy Contracts Leader
Idaho Power Company

(208) 388-2614

E-mail: rallphin@idahopower.com

EXHIBIT 8

P.O. Box 70 (83707)
1221 W. Idaho St.
Boise, ID 83702

TRANSITION OF THE DOW JONES U.S. ELECTRICITY INDICES

Transition Highlights

Effective after the close of business on Friday, September 13, 2013, Platts, a leading global provider of energy, petrochemicals, metals and agriculture information, and a premier source of benchmark price assessments for those commodity markets, will begin providing you with price data that will replace the U.S. electricity prices you currently receive from S&P Dow Jones Indices.

As a result, the calculation and dissemination of the Dow Jones U.S. Electricity Indices will transition to Platts. The following table highlights the changes that will take place as a result of this transition. The full Platts Methodology Guide is [available here](#).

	S&P Dow Jones Indices Calculation Methodology	Platts Calculation Methodology
Dates	Prices published on flow date.	Prices published on trade date.
Calculation	Weighted average index.	Weighted average price assessment with high correlation to the Dow Jones U.S. Electricity Indices.
	Both firm and non-firm liquidated damages are calculated.	Both firm and non-firm liquidated damages will be calculated.
Contributors	There is substantial overlap between the contributors to Platts and Dow Jones Electricity Indices; this ensures ongoing continuity in pricing.	
Distribution	<ul style="list-style-type: none"> • Files will be delivered via the Platts FTP feed in comma separated value (.csv) format beginning September 13, 2013. There will be no change to file formats. • Email delivery will continue from September 13 through October 30, 2013 in .csv format. Email delivery will cease on October 31, 2013. 	

Reminder: as previously announced, effective after the close of business on Friday, August 30, 2013, S&P Dow Jones Indices will no longer calculate the Dow Jones U.S. Hourly Electricity Indices.