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IDAHO PUBLIC UTILITIES COMMISSION

DONOVAN E. WALKER
Lead Counsel
dwalker@idahopower.com

February 21, 2014

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-13-22
Update to Wind Integration Rates and Charges – Idaho Power Company's
Answer to Motions to Dismiss, Joinders, and Comments

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Answer to Motions to Dismiss, Joinders, and Comments.

Very truly yours,

Donovan E. Walker

DEW:csb
Enclosures

DONOVAN E. WALKER (ISB No. 5921)
JULIA A. HILTON (ISB No. 7740)
Idaho Power Company
1221 West Idaho Street (83702)
P.O. Box 70
Boise, Idaho 83707
Telephone: (208) 388-5317
Facsimile: (208) 388-6936
dwalker@idahopower.com
jhilton@idahopower.com

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION TO UPDATE) CASE NO. IPC-E-13-22
ITS WIND INTEGRATION RATES AND)
CHARGES.) IDAHO POWER COMPANY'S
) ANSWER TO MOTIONS TO
) DISMISS, JOINDERS, AND
) COMMENTS
)
_____)

In accordance with RP 56 and RP 256, Idaho Power Company ("Idaho Power" or "Company") hereby respectfully requests the Idaho Public Utilities Commission ("Commission") deny various parties' Motions to Dismiss Idaho Power's Application to update its wind integration rates and charges.

The intervening parties have asked the Commission to dismiss Idaho Power's Application in its entirety; strike designated portions from Idaho Power's Application; admonish Idaho Power for filing its Application; and to initiate workshops before filing another Application—all based around the argument that there has been some kind of improper or unlawful unilateral modification of an existing contract. Idaho Power did not