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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for Renewable Northwest Project and American Wind Energy Association

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE
APPLICATION OF IDAHO POWER
COMPANY TO UPDATE ITS WIND
INTEGRATION RATES AND
CHARGES.

Case No. IPC-E-13-22

AWEA AND RNP COMMENTS IN
SUPPORT OF MOTION TO DISMISS

I. INTRODUCTION

Pursuant to Idaho Public Utilities Commission (“IPUC” or “Commission”) Rules of Procedure (“RP”) 56 and 256, Renewable Northwest Project (“RNP”) and American Wind Energy Association (“AWEA”) hereby file these Comments in support of the January 31, 2014, Motion to Dismiss the Application of Idaho Power Company (“Idaho Power” or the “Company”) to Update its Wind Integration Rates and Charges (the “Application”) filed by Cold Springs Windfarm, LLC, Desert Meadow Windfarm, LLC, Hammett Hill Windfarm, LLC, Mainline Windfarm, LLC, Ryegrass Windfarm, LLC, Two Ponds Windfarm, LLC, Cassia Wind Farm LLC, Hot Springs Windfarm, LLC, Bennett Creek Windfarm, LLC, Cassia Gulch Wind Park LLC, Tuana Springs Energy, LLC, and High Mesa Energy, LLC (collectively, “Movants”). Specifically, RNP and AWEA (1) support Movants’ Motion to Dismiss to the extent that it argues for dismissal of Idaho Power’s Application in its entirety, and (2) recommend that the