



SNAKE RIVER ALLIANCE

IDAHO'S NUCLEAR WATCHDOG & CLEAN ENERGY ADVOCATE

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IDAHO PUBLIC
UTILITIES COMMISSION

February 7, 2014

To: Idaho Public Utilities Commission

From: Ken Miller, Clean Energy Program Director, Snake River Alliance

Re: Snake River Alliance Comments on Motion to Dismiss Application of Idaho Power Company to Update Its Wind Integration Rates and Charges, Case No. IPC-E-13-22.

The Snake River Alliance provides these comments on the Motion to Dismiss the above-referenced case and 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 ("Movants").

Introduction and Procedure

The Snake River Alliance ("Alliance") appreciates the efforts that the Commission and all parties in this case have devoted to try to resolve some of the many issues raised in this docket and those that preceded it. Few issues that have come before this Commission have proven as difficult to resolve as those surrounding wind integration and related cost issues.

Despite the long-running disputes over wind-related regulatory and financing matters, Idaho Power has nonetheless succeeded in adding significant amounts of wind generation over the past three to five years. That progress notwithstanding, it is clear once again that we are at an impasse over central issues between wind developers and electric utilities.

It is because of the history of this issue, the complexities presented in IPC-E-13-22, and the sheer number of interested parties that the Alliance questions whether this case can be resolved with some degree of satisfaction among the parties through a Modified Procedure. If this case is to move forward – and we question whether it should in its present form – we believe a technical hearing will be required so that the many issues in dispute can be more fully addressed.