

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER REDFORD
COMMISSIONER SMITH
COMMISSION SECRETARY
COMMISSION STAFF**

**FROM: KRISTINE SASSER
DEPUTY ATTORNEY GENERAL**

DATE: JULY 10, 2014

**SUBJECT: IDAHO POWER'S REQUEST TO UPDATE ITS WIND INTEGRATION
RATES AND CHARGES, CASE NO. IPC-E-13-22**

On November 29, 2013, Idaho Power Company filed an Application with the Commission seeking to update its wind integration rates and charges. The Company's Application includes a 2013 Wind Integration Study Report as well as the supporting testimony of Philip DeVol and Michael J. Youngblood.

BACKGROUND

A Notice of Application was issued on December 31, 2013, allowing 21 days for intervention. All parties who petitioned were granted intervention. A Notice of Parties was issued on January 31, 2014. Twelve intervenors¹ (all qualifying facilities, "QFs") represented by the firm of Richardson Adams filed a Motion to Dismiss on January 31, 2014 (hereafter, "Petitioners"). The remaining Intervenors² filed motions in response to the Motion to Dismiss. Idaho Power filed an Answer to the Motion to Dismiss and additional motions on February 21, 2014. The Petitioners filed a reply to Idaho Power's answer on February 28, 2014.

The Commission issued Order No. 33030 on April 30, 2014, denying Petitioners' Motion to Dismiss. However, we clarified that "any Commission approved modifications to Idaho Power's wind integration rates and charges will only apply prospectively – to new

¹ 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.

² American Wind Energy Association; Idaho Wind Partners I, LLC; Idaho Winds, LLC; Renewable Northwest Project; Rockland Wind Farms, LLC; Snake River Alliance;

contracts as they are entered into by the parties and submitted to the Commission for approval.” *Id.* at 8. The Commission allowed parties 14 days to withdraw as intervenors if any party believed that, based on our ruling in Order No. 33030, it no longer had a direct and substantial interest in the underlying proceeding. Several parties withdrew from the case. An Amended Notice of Parties was issued on May 20, 2014. Thereafter, the parties proposed, and the Commission adopted the following procedural schedule:

Comment deadline	July 2, 2014
Settlement conference	July 9, 2014
Reply comment deadline	July 22, 2014

Order No. 33054. The parties agreed to process the case by Modified Procedure.

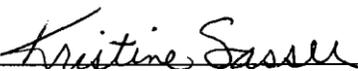
REQUEST FOR ADDITIONAL PROCEDURE

On July 9, 2014, the parties met to discuss settlement. Although the parties were unable to resolve their differing positions regarding wind integration, knowledge was gained through discussion that has led to the desire by all parties for further inquiry. Also, although Idaho Power’s initial Application did not represent a position by the Company, Idaho Power indicated during settlement that it intends to submit and support a position through reply comments. The parties agree that, based on the above circumstances, additional time for discovery and comment is reasonable and necessary in order to develop an adequate and thorough record upon which the Commission’s decision can be based. Therefore, based on agreement between the parties, Staff proposes the following additional procedure:

(Existing) reply comment deadline	July 22, 2014
Deadline for additional discovery requests	July 29, 2014
Supplementary comment deadline	September 4, 2014
Supplementary reply comment deadline	September 17, 2014

COMMISSION DECISION

Does the Commission wish to adopt the additional procedural schedule proposed by the parties?



Kristine A. Sasser
Deputy Attorney General

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