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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER )**  
**COMPANY'S APPLICATION TO UPDATE ITS )** **CASE NO. IPC-E-13-22**  
**WIND INTEGRATION RATES AND CHARGES. )**  
**)** **SUPPLEMENTARY COMMENTS**  
**)** **OF THE COMMISSION STAFF**  
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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Amended Schedule issued in Order No. 33075 on July 15, 2014, in Case No. IPC-E-13-22, submits the following supplementary comments.

**BACKGROUND**

On November 29, 2013, Idaho Power Company ("Idaho Power" or "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.

In its Application, Idaho Power requested that the Commission approve the updated wind integration costs as identified in its 2013 Wind Study and set forth in the proposed Schedule 87. Idaho Power proposed two overall changes to address the collection of wind integration costs. The first change abandons the use of a percentage of avoided cost rate allocation and instead