



May 21, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

RECEIVED
2014 MAY 22 AM 9:45
IDAHO PUBLIC
UTILITIES COMMISSION

201 South Main, Suite 2300
Salt Lake City, Utah 84111

**Re: CASE NO. IPC-E-14-09: IN THE MATTER OF IDAHO POWER
COMPANY'S PETITION TO TEMPORARILY SUSPEND ITS PURPA
OBLIGATION TO PURCHASE ENERGY GENERATED BY SOLAR
POWERED QUALIFYING FACILITIES**

Dear Ms. Jewell:

Please find enclosed for filing an original and seven (7) copies of Rocky Mountain Power's comments in support of solar integration charges.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,


Jeffrey K. Larsen

Vice President, Regulation and Government Affairs

Enclosures

Cc: via electronic mail
Donovan Walker, Idaho Power Company

Daniel E. Solander (ISB #8931)
Rocky Mountain Power
201 S. Main St., Suite 2300
Salt Lake City, UT 84111
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Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S PETITION TO) CASE NO. IPC-E-14-09
TEMPORARILY SUSPEND ITS PURPA)
OBLIGATION TO PURCHASE ENERGY)
GENERATED BY SOLAR POWERED) Comments of Rocky Mountain
QUALIFYING FACILITIES) Power in Support of Solar
) Integration Charges

COMMENTS OF ROCKY MOUNTAIN POWER
IN SUPPORT OF SOLAR INTEGRATION CHARGES

COMES NOW PacifiCorp dba Rocky Mountain Power (or the "Company") and pursuant to Rules 56, 203, and 256 of the Rules of Procedure of the Idaho Public Utility Commission (the "Commission"), submits comments in support of including solar integration costs in new power purchase agreements with solar powered qualifying facilities ("QFs").

I. Background

On May 14, 2014, Idaho Power Corporation ("Idaho Power") filed a petition with the Commission for an order temporarily suspending Idaho Power's obligation to enter into contracts and/or obligations to purchase energy generated by qualifying solar-powered QFs under the Public Utility Regulatory Policies Act of 1978 ("PURPA"), or

alternatively, an order determining that any future solar PURPA contracts shall contain an appropriate solar integration charge.

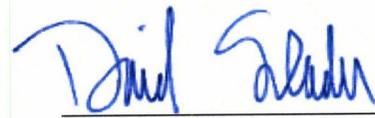
Rocky Mountain Power supports Idaho Power's efforts to include appropriate solar integration charges in PURPA contracts. Rocky Mountain Power believes that, as Idaho Power argued, unless the cost of integrating solar generation is taken into account, including accounting for the availability of transmission service, customers are harmed by paying solar QFs a price that is above the avoided cost.

While Rocky Mountain Power is not requesting Commission action with respect to its own obligations under PURPA at this time, it anticipates requesting approval of a solar integration charge sometime in the future, after further evaluating its own assessment of solar integration costs. The Company currently charges solar QFs in Utah a solar integration charge per the Utah Public Service Commission Order issued on August 16, 2013, in Docket No. 12-035-100, which is based on a percentage of the wind integration costs that are charged to wind QFs in that jurisdiction. In Oregon, the Public Utility Commission agreed that integration costs are legitimate costs that should be factored into avoided cost calculations and will revisit this issue in the future as more solar development occurs.¹

Based on the foregoing, Rocky Mountain Power recommends that the Commission approve Idaho Power's petition to include an appropriate solar integration charge for all future solar QFs.

¹ In the Matter of PUBLIC UTILITY COMMISSION OF OREGON, Investigation Into Qualifying Facility Contracting and Pricing, Docket No. 1610, Order No. 14-058 at 15 (February 24, 2014).

DATED this 21st day of May 2014.



Daniel E. Solander

Attorney for
Rocky Mountain Power