

Jean Jewell

From: mvangulik@sunergyworld.com
Sent: Wednesday, May 21, 2014 11:32 PM
To: Beverly Barker; Jean Jewell; Gene Fadness
Cc: mvangulik@sunergyworld.com
Subject: Case Comment Form: Mark Van Gulik

Name: Mark Van Gulik
Case Number: IPC-E-14-09
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Name of Utility Company: Idaho Power
Acknowledge public record: True

Comment: May 21, 2014

Via Electronic Transmission

Honorable Paul Kjellandar
Honorable Marsha Smith
Honorable Mark Redford
Idaho Public Utility Commission
472 West Washington Street
Boise, Idaho 83702

RE: Idaho Power Company Petition to Suspend Purchase of Solar Powered Energy, IPC-E-14-09.

Dear Commissioners

Sunergy World wishes to supply supplemental comments to the verbal comments provided by Leif Elgethun on behalf of Sunergy World at the public hearing on May 21, 2014. These comments are in response to questions posed at the conclusion of Mr. Elgethun's statements. Commissioner Chair Smith and Commissioner Kjellandar both poised questions in regards to Sunergy World's knowledge of pending solar integration charges as well as precedent from wind cases. Sunergy World was aware of both cases per Mr. Elgethun's testimony, agrees that solar integration charges could be relevant in Idaho Power's PURPA obligations, but disputes the notion that any potential changes to current agreed upon methodology should have any bearing on negotiations between developers and Idaho Power prior to their petition or until Idaho Power can prove solar integration charges are necessary to protect rate payers. We would like to submit a timeline of our negotiations with Idaho Power to show we were acting in good faith with Idaho Power to negotiate a contract and that Idaho Power did not indicate at any time they would like to include a solar integration charge in those negotiations.

The following is the timeline of events for the Sunergy World Project negotiations with Idaho Power Company specifically with Jonathan Monschke, Mark van Gulik, Randy Alphin and Michael Darrington.

January 23, 2014 - Emailed Randy Alphin in regards to the two of our projects for discussion and possible PPA PURPA Contracts.

January 24, 2014 - Randy responded to introduce Michael Darrington and to schedule a meeting.

March 12, 2014 - First meeting with Randy, Michael, Jonathan and Mark to discuss in detail the process for establishing pricing for our two solar projects, and how Idaho Power establish pricing utilizing the IRP method. At NO time was the Integration charge discussed or brought up.

March 15, 2014 or around that date - Sunergy submitted our detailed hourly data to Michael for both project to receive preliminary pricing.

April 11, 2014 - Received DRAFT PURPA Contracts for Discussion ONLY contracts for both of the projects discussed that included preliminary pricing schedules for the IRP methodology. Again, the DRAFT PURPA Contracts did NOT include any language or mention of an Integration Charge.

April 29, 2014 - Meeting with Randy, Michael, Mark and Jonathan (on Conference) to discuss both PURPA Contracts and what would be the probability of increasing the contract length from 20 to 25 years and how the pricing would be effected along with increasing the size of each project from 20 MW to 40 MW. Again, response was that both projects data would need to be resubmitted and analysis in the same fashion as the original project submittal. NO mention of any Integration Charge was discussed.

May 14, 2014 - Received the Petition from Randy Alphin.

Summary, as discussed, Sunergy is willing to discuss and negotiate both Contracts with Idaho Power in good faith and currently is planning to "Turn" both contracts back to Idaho Power for continued negotiation. We anticipate re-submitting our data for confirmed pricing for the larger size, but are willing to keep both projects at 20 MW each to at least get the projects started.

Sincerely,

Mark van Gulik

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