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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER COMPANY FOR)
CONFIRMATION OF THE CAPACITY)
DEFICIENCY PERIOD FOR INCREMENTAL)
COST, INTEGRATED RESOURCE PLAN,)
AVOIDED COST METHODOLOGY.)
)
)

CASE NO. IPC-E-14-22
COMMENTS OF THE
COMMISSION STAFF

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 Application and Notice of Modified Procedure issued in Order No. 33116 on September 5, 2014 and scheduling Order No. 33147 issued on September 30, 2014, in Case No. IPC-E-14-22, submits the following comments.

BACKGROUND

On December 18, 2012, the Commission issued Order No. 32697 authorizing the use of Idaho Power’s incremental cost IRP methodology. Solar and wind QF projects that exceed 100 kilowatts (kW) and all other QF generation that exceeds 10 average megawatts (aMW) negotiate avoided cost rates based on the approved incremental cost IRP methodology. In its Order, the Commission stated “We further find it appropriate to identify each utility’s capacity deficiency