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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER COMPANY FOR APPROVAL) CASE NO. IPC-E-14-23
OR REJECTION OF AN ENERGY SALES)
AGREEMENT WITH BLACK CANYON BLISS,) COMMENTS OF THE
LLC, FOR THE SALE AND PURCHASE OF) COMMISSION STAFF
ELECTRIC ENERGY FROM THE BLACK)
CANYON BLISS HYDRO PROJECT.)**

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 Modified Procedure issued in Order No. 33124 on September 9, 2014, in Case No. IPC-E-14-23, submits the following comments.

BACKGROUND

On August 27, 2014, Idaho Power Company (Company) filed an Application requesting that the Commission accept or reject an Agreement between Idaho Power and Black Canyon Bliss, LLC (Black Canyon), for the sale and purchase of electric energy generated by the Black Canyon Bliss Hydro Project.

On August 19, 2014, Idaho Power and Black Canyon entered into an Agreement pursuant to the terms and conditions of various Commission Orders applicable to PURPA agreements for non-seasonal hydro projects. Idaho Power states that Black Canyon proposes to operate and