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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-14-24
AND IMPLEMENTATION OF SCHEDULE 73,)
COGENERATION AND SMALL POWER) COMMENTS OF THE
PRODUCTION.) 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 Application and Notice of Modified Procedure issued in Order No. 33136 on September 24, 2014, in Case No. IPC-E-14-24, submits the following comments.

BACKGROUND

In Case No. GNR-E-11-03, several parties expressed an interest in the investor-owned utilities developing and adopting certain procedures to be used by QF developers and such utilities to negotiate and enter into power purchase agreements under PURPA. In Order No. 32697, the Commission directed the parties to participate in workshops "to begin to form a structure for fair and reasonable contracting procedures and rules." Draft proposed contracting procedures prepared by the utilities and certain QF developers were discussed at those workshops; however, a consensus on a complete set of contracting procedures to be used by all utilities was not reached.