

Williams · Bradbury

A T T O R N E Y S A T L A W

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IDAHO PUBLIC
UTILITIES COMMISSION

December 3, 2014

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

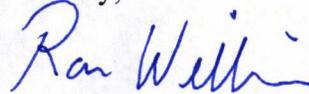
Re: IPC-E-14-32 through IPC-E-14-36

Dear Ms. Jewell:

Please find enclosed an original and seven copies of the Initial Comments of Murphy Flat Power, LLC, Simco Solar, LLC, American Falls Solar, LLC, American Falls Solar II, LLC, and Orchard Ranch Solar, LLC in Support of Approval of an Energy Sales Agreement with Idaho Power Company for filing in the above referenced cases.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr
Enclosures

Ronald L. Williams, ISB No. 3034
Williams Bradbury, P.C.
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*Attorney for Murphy Flat Power, LLC, Simco Solar, LLC, American Falls Solar, LLC,
American Falls Solar II, LLC, and Orchard Ranch Solar, LLC*

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-32
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) INITIAL COMMENTS OF MURPHY
ENERGY SALES AGREEMENT WITH) FLAT POWER, LLC IN SUPPORT OF
MURPHY FLAT POWER, LLC FOR THE) APPROVAL OF AN ENERGY SALES
SALE AND PURCHASE OF ELECTRIC) AGREEMENT WITH IDAHO POWER
ENERGY.) COMPANY

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-33
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) INITIAL COMMENTS OF SIMCO
ENERGY SALES AGREEMENT WITH) SOLAR, LLC IN SUPPORT OF
SIMCO SOLAR, LLC FOR THE SALE) APPROVAL OF AN ENERGY SALES
AND PURCHASE OF ELECTRIC) AGREEMENT WITH IDAHO POWER
ENERGY.) COMPANY

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-34
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) INITIAL COMMENTS OF
ENERGY SALES AGREEMENT WITH) AMERICAN FALLS SOLAR, LLC IN
AMERICAN FALLS SOLAR, LLC FOR) SUPPORT OF APPROVAL OF AN
THE SALE AND PURCHASE OF) ENERGY SALES AGREEMENT
ELECTRIC ENERGY.) WITH IDAHO POWER COMPANY

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-35
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) INITIAL COMMENTS OF
ENERGY SALES AGREEMENT WITH) AMERICAN FALLS SOLAR II, LLC
AMERICAN FALLS SOLAR II, LLC FOR) IN SUPPORT OF APPROVAL OF AN
THE SALE AND PURCHASE OF) ENERGY SALES AGREEMENT
ELECTRIC ENERGY.) WITH IDAHO POWER COMPANY

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR APPROVAL OR REJECTION OF AN ENERGY SALES AGREEMENT WITH ORCHARD RANCH SOLAR, LLC FOR THE SALE AND PURCHASE OF ELECTRIC ENERGY.) CASE NO. IPC-E-14-36)) INITIAL COMMENTS OF ORCHARD) RANCH SOLAR, LLC IN SUPPORT) OF APPROVAL OF AN ENERGY) SALES AGREEMENT WITH IDAHO) POWER COMPANY
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In response to the Notices of Application and Notices of Modified Procedure issued in Order Numbers 33168 through 33172 in the above referenced dockets, and pursuant to Rule 203 of the Rules of Procedure of the Idaho Public Utilities Commission (the “Commission”), Murphy Flat Power, LLC, Simco Solar, LLC, American Falls Solar, LLC, American Falls Solar II, LLC, and Orchard Ranch Solar, LLC (collectively, the “Solar Projects”) by and through their attorney of record, Ronald L. Williams, Williams Bradbury, P.C., hereby submit the following Initial Comments.

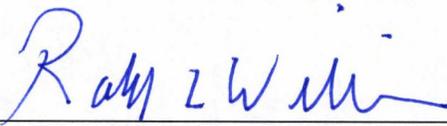
1. On November 20, 2014, Idaho Power Company (“Idaho Power” or the “Company”) filed Initial Comments in the above five dockets stating that each of the Solar Projects had requested the Company re-run the pricing contained in the Energy Sales Agreements (“ESAs”) for the Solar Projects, to incorporate the two pricing changes proposed by Idaho PUC Staff in Case No. IPC-E-14-19 (Grand View Solar) and Case No. IPC-E-14-20 (Boise City Solar)¹. Attached to the Company’s Initial Comments is a revised Appendix E (“*Solar Facility Energy Prices and Integration Charges*”) for each of the Solar Projects that incorporated the same Staff adjustments recommended in Grand View Solar and Boise City Solar.

¹ In the Grand View Solar and Boise City Solar cases Staff recommended two modifications to the ESA pricing related to assumptions about fuel forecasts and displaceable resources of the Company.

2. Each of the Solar Projects has notified Idaho Power that it agrees to adopt the Replacement Appendix E attached to Idaho Power's Initial Comments, which Appendix E incorporates Staff's recommended changes in the Company's pricing model. Each of the Solar Projects consents to the Replacement Appendix E attached to the Initial Comments of the Company replacing the existing Appendix A, and to the Replacement Appendix E becoming part of the executed ESA.

3. Wherefore, the Solar Projects request that the Commission approve the ESA's entered into between Idaho Power and Murphy Flat Power, LLC, Simco Solar, LLC, American Falls Solar, LLC, American Falls Solar II, LLC, and Orchard Ranch Solar, LLC.

Respectfully submitted this 3rd day of December, 2014.

By: 

Ronald L. Williams
Attorney for the Solar Projects

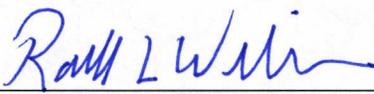
CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of December, 2014, I caused to be served, via the method(s) indicated below, true and correct copies of the foregoing document, upon:

Jean Jewell, Secretary	Hand Delivered	<input checked="" type="checkbox"/>
Idaho Public Utilities Commission	U.S. Mail	<input type="checkbox"/>
472 West Washington Street	Fax	<input type="checkbox"/>
P.O. Box 83720	Fed. Express	<input type="checkbox"/>
Boise, ID 83720-0074	Email	<input type="checkbox"/>
jjewell@puc.state.id.us		

Donovan E. Walker	Hand Delivered	<input type="checkbox"/>
Randy C. Allphin	U.S. Mail	<input type="checkbox"/>
Regulatory Dockets	Fax	<input type="checkbox"/>
Idaho Power Company	Fed. Express	<input type="checkbox"/>
1221 West Idaho Street	Email	<input checked="" type="checkbox"/>
P.O. Box 70		
Boise, ID 83707		
dwalker@idahopower.com		
rallphin@idahopower.com		
dockets@idahopower.com		

Kristine A. Sasser	Hand Delivered	<input checked="" type="checkbox"/>
Deputy attorney general	U.S. Mail	<input type="checkbox"/>
Idaho Public Utilities Commission	Fax	<input type="checkbox"/>
472 W. Washington St.	Fed. Express	<input type="checkbox"/>
PO Box 83720	Email	<input type="checkbox"/>
Boise, ID 83720-0074		
kris.sasser@puc.idaho.gov		

BY: 
Ronald L. Williams
Attorney for the Solar Projects