

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 18, 2014

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

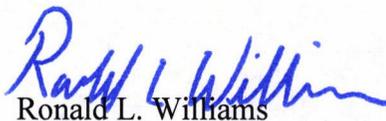
Re: IPC-E-14-32 through IPC-E-14-36

Dear Ms. Jewell:

Please find enclosed an original and seven copies of the Reply Comments of Murphy Flat Power, LLC, Simco Solar, LLC, American Falls Solar, LLC, American Falls Solar II, LLC, and Orchard Ranch Solar, LLC 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
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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) REPLY COMMENTS
ENERGY SALES AGREEMENT WITH)
MURPHY FLAT POWER, LLC FOR THE)
SALE AND PURCHASE OF ELECTRIC)
ENERGY.)

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

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

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

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2014 DEC 18 PM 1:35
IDAHO PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. IPC-E-14-36
OF IDAHO POWER COMPANY FOR)
APPROVAL OR REJECTION OF AN) REPLY COMMENTS
ENERGY SALES AGREEMENT WITH)
ORCHARD RANCH SOLAR, LLC FOR)
THE SALE AND PURCHASE OF)
ELECTRIC ENERGY.)

COMES NOW Murphy Flat Power, LLC (“Murphy Flat”), Simco Solar, LLC (“Simco Solar”), American Falls Solar, LLC (“American Falls Solar”), American Falls Solar II, LLC (“American Falls Solar II”), and Orchard Ranch Solar, LLC (“Orchard Ranch”), (collectively, the “Solar Projects”) by and through their attorney of record, Ronald L. Williams, Williams Bradbury, P.C., hereby submit the following Reply Comments.

1. Murphy Flat, Simco Solar and American Falls Solar do not object to Staff’s recommendation that the avoided cost rates consistent with Idaho Power’s Response to Staff’s Third Production Request be substituted for the avoided cost rates contained in the Energy Sales Agreements (“ESAs”) for each of these three Solar Projects. Murphy Flat, Simco Solar and American Falls Solar consent to Idaho Power preparing and submitting a revised Appendix E for each Solar Project’s ESA reflecting the price changes as shown on Idaho Power’s response to the Third Production Request.

2. American Falls Solar II and Orchard Ranch concur in Staff’s recommendation that their respective ESAs be approved by the Commission incorporating the avoided cost rates contained in Attachment 1 of Idaho Power’s November 20, 2014, Initial Comments (Replacement Appendix E to the original Agreement).

3. Simco Solar and Orchard Ranch have communicated to Idaho Power a change in location and Idaho Power has concurred in those changes. Simco Solar and Orchard Ranch

hereby consent to Idaho Power submitting a revised Appendix B to the Commission noting those location adjustments.

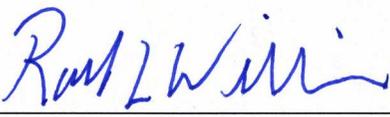
WHEREFORE, the Solar Projects respectfully request that:

(i) the ESAs for Murphy Flat, Simco Solar and American Falls be approved by the Commission with a substituted Appendix E ("*Solar Facility Energy Prices and Integration Charges*") to be submitted by Idaho Power that reflects the price changes as shown on Idaho Power's response to the Third Production Request of Commission Staff,

(ii) the ESAs for American Falls Solar II and Orchard Ranch be approved by the Commission with the Replacement Appendix E submitted by Idaho Power on November 20, 2014, and

(iii) the ESAs for Simco Solar and Orchard Ranch be approved with the substituted Appendix Bs to be submitted by Idaho Power reflecting those location changes.

Respectfully submitted this 18th day of December, 2014.

By: 

Ronald L. Williams
Attorney for the Solar Projects

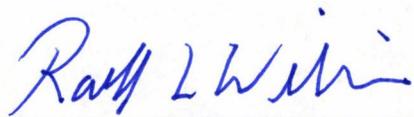
CERTIFICATE OF SERVICE

I hereby certify that on the 18th 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 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 checked="" type="checkbox"/>
Boise, ID 83720-0074		
kris.sasser@puc.idaho.gov		

BY: 
Ronald L. Williams
Attorney for the Solar Projects