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Attorney for the Commission Staff

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IDAHO PUBLIC
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF IDAHO POWER COMPANY FOR APPROVAL OR REJECTION OF FIVE ENERGY SALES AGREEMENTS FOR THE SALE AND PURCHASE OF ELECTRIC ENERGY.	)	**CASE NOS. IPC-E-14-32** **IPC-E-14-33** **IPC-E-14-34** **IPC-E-14-35** **IPC-E-14-36** **COMMISSION STAFF MOTION TO EXTEND DEADLINE FOR FILING COMMENTS**

On October 17, 2014, Idaho Power Company filed five Applications with the Commission each requesting acceptance or rejection of a 20-year Energy Sales Agreement (Agreement) with Idaho Power – Murphy Flat Power, IPC-E-14-32; Simco Solar, IPC-E-14-33; American Falls Solar, IPC-E-14-34; American Falls Solar II, IPC-E-14-35; and Orchard Ranch Solar, IPC-E-14-36. On November 6, 2014, the Commission issued Notices of Application and Notices of Modified Procedure setting a comment deadline for each Project of December 5, 2014. Reply comments were to be filed no later than December 12, 2014.

The proposed Agreements have rates calculated based on the incremental cost IRP Methodology. The issuance of Final Orders (33179, 33180) in two similarly situated cases caused Idaho Power to file Initial Comments on November 20, 2014, that modified the pricing used in the original Applications and Agreements (Replacement Appendices). On December 3,

2014, each Project filed Initial Comments that accepted and consented to the use of the Replacement Appendices provided by Idaho Power in the Company's Initial Comments.

Application of the IRP Methodology involves complicated and detailed calculations based on different inputs for each Project. Review of the variables and verification of the inputs used is an arduous task. Staff's review of the inputs and variables used for each Project has triggered additional questions and the need for additional review. Today, December 3, 2014, Staff filed an additional production request. We have requested that Idaho Power respond no later than Tuesday, December 9, 2014.

In order to provide Staff enough time to receive and adequately review the production responses, we request an extension for filing comments. Pursuant to Rule of Procedure 256.03, Staff has provided actual notice by telephone of this motion to counsel for all parties. IDAPA 31.01.01.256.03. We, therefore, propose the following modifications:

Comments due	Friday, December 12, 2014
Reply comments due	Friday, December 19, 2014

Staff respectfully requests that the Commission issue an Order approving the modified schedule.

Respectfully submitted this 3RD day of December 2014.

Kristine A. Sasser

Kristine A. Sasser
Deputy Attorney General

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 3RD DAY OF DECEMBER 2014, SERVED THE FOREGOING **COMMISSION STAFF MOTION TO EXTEND DEADLINE FOR COMMENTS,** IN CASE NO. IPC-E-14-34, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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