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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
IDAHO POWER COMPANY FOR APPROVAL)	CASE NO. IPC-E-18-01
OR REJECTION OF AN ENERGY SALES)	
AGREEMENT WITH DOUG AND NANCY)	COMMENTS OF THE
HULL FOR THE SALE AND PURCHASE OF)	COMMISSION STAFF
ELECTRIC ENERGY FROM THE CURRY)	
CATTLE COMPANY HYDRO PROJECT)	
_____)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Camille Christen, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 33977 on January 30, 2018, in Case No. IPC-E-18-01, submits the following comments.

BACKGROUND

On January 10, 2018, Idaho Power Company applied to the Commission for an Order approving or rejecting its Energy Sales Agreement (ESA) with Doug and Nancy Hull (Hull). Under the proposed ESA, Hull would sell and Idaho Power would purchase electric energy generated by the Curry Cattle Company hydro project located near Twin Falls, Idaho. Application at 1. The Curry Cattle Company hydro project is a 250 kilowatt (kW) “qualifying facility” (QF) under the Public Utility Regulatory Policies Act (PURPA). *Id.* at 4.

The parties have an existing ESA for the facility that expires on June 16, 2018; the proposed ESA is a replacement contract with a new term and updated published avoided cost

rates. *Id.* at 2. Hull elected for the ESA to have a 15-year term with non-levelized rates for seasonal hydro projects smaller than 10 average megawatts. *Id.* at 4. The ESA uses the rates established by the Commission in Order No. 33773 dated June 1, 2017. *Id.* Because the ESA is a replacement contract, its rates contain capacity payments for the entire term. *Id.* at 3. The ESA also provides that all applicable interconnection charges and monthly operational or maintenance charges under Schedule 72 will be assessed to Hull. *Id.* at 5.


STAFF REVIEW

Staff has reviewed the proposed rates and confirms they are correct. All other terms and conditions contained in the proposed Agreement are consistent with prior Commission orders.

STAFF RECOMMENDATIONS

Staff recommends that the Commission approve all of the Agreement's terms and conditions and declare that all payments made by Idaho Power to Doug and Nancy Hull for purchase of energy from the Curry Cattle hydro project will be allowed as prudently incurred expenses for ratemaking purposes.

Respectfully submitted this 20th day of February 2018.



Camille Christen
Deputy Attorney General

Technical Staff: Rachelle Farnsworth
Yao Yin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 20TH DAY OF FEBRUARY 2018, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. IPC-E-18-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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SECRETARY

CERTIFICATE OF SERVICE