BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF PACIFICORP DBA ROCKY MOUNTAIN POWER'S PETITION TO REVISE THE PUBLISHED AVOIDED COST RATES TO INCLUDE MONTHLY PRICE MULTIPLIERS TO DIFFERENTIATE FOR ENERGY DELIVERED DURING HEAVY LOAD HOURS AND LIGHT LOAD HOURS

CASE NO. PAC-E-07-13 NOTICE OF PETITION NOTICE OF MODIFIED PROCEDURE NOTICE OF COMMENT/PROTEST DEADLINE

YOU ARE HEREBY NOTIFIED that on June 18, 2007, PacifiCorp dba Rocky Mountain Power (RMP; Company) filed a Petition with the Idaho Public Utilities Commission (Commission) requesting authority to revise its published avoided cost rates for qualifying facilities (QFs) under Sections 201 and 210 of the Public Utility Regulatory Policies Act of 1978 (PURPA) to include monthly price multipliers to recognize the monthly difference in value between energy delivered by QFs during heavy load hours (HLH) and energy delivered during light load hours (LLH). As reflected in the Company's Petition, this revision would not change the computation of avoided cost but could change the total revenues received by QFs depending on which month and when during the day they deliver energy.

RMP notes that Idaho Power Company in its petition in pending Case No. IPC-E-07-04 has requested that the published avoided cost rates be adjusted to include a daily load shape. Idaho Power already has in place a recognition of its seasonal load. RMP notes further that Avista Corporation requested, and the Commission approved, a similar daily shape adjustment in Case No. AVU-E-06-04 (Order No. 30111).

As reflected in RMP's Petition, at the present time, the Company pays the same price to a QF that delivers energy entirely during light load hours as it pays to a QF that delivers entirely during heavy load hours. Likewise, the Company pays the same price to a QF that delivers entirely in a peak load month as it pays to a QF that delivers entirely in a non-peak load month. RMP believes that the existing payment structure is inappropriate as it does not provide proper incentives to QFs, and is neither fair to customers nor to the QF because it could result in either under- or over-payments for the value of the power.

NOTICE OF PETITION NOTICE OF MODIFIED PROCEDURE NOTICE OF COMMENT/PROTEST DEADLINE 1 The Company's proposed heavy load hour and light load hour monthly price multipliers are reflected below.

Month			-	_			, ,	U	-		Nov	Dec
HLH	103%	105%	95%	95%	92%	94%	121%	121%	109%	115%	110%	129%
LLH	94%	97%	80%	76%	63%	65%	92%	106%	99%	105%	96%	120%

Note: These monthly price multipliers are derived from:

- 48 months of historical daily Dow Jones firm market data for the COB, Four Corners, Mid-Columbia and Palo Verde wholesale market hubs. The 48-months reflected in this analysis is from April 1, 2003 through to and including March 31, 2007; and
- (2) 48 months of system balancing data extracted from two GRID scenarios; a Base Case and an Avoided Cost Case. The 48 months reflected in these studies is from January 1, 2007 through to and including December 31, 2010.

These multipliers are subject to change if different 48-month periods are selected.

RMP notes that it has provided its Petition via e-mail to all intervenors in Case No. IPC-E-05-22 and other entities that participated in the wind workshops that followed the issuance of Order No. 29839, the Commission's Order reducing the published rate cap for published avoided cost rates for eligible wind projects from 10 aMW to 100 kW.

YOU ARE FURTHER NOTIFIED that the Commission has reviewed the filings of record in Case No. PAC-E-07-13. The Commission has preliminarily found that the public interest in this matter may not require a hearing to consider the issues presented and that issues raised by the Company's filing may be processed under **Modified Procedure**, i.e., by written submission rather than by hearing. Reference Commission Rules of Procedure, IDAPA 31.01.201-204.

YOU ARE FURTHER NOTIFIED that the **deadline for filing written comments or protests** with respect to Rocky Mountain Power's Petition and the use of Modified Procedure in Case No. PAC-E-07-13 is **Friday**, **July 27**, **2007**. Persons desiring a hearing must specifically request a hearing in their written protest or comments.

YOU ARE FURTHER NOTIFIED that if no written comments or protests are received within the deadline, the Commission may consider the matter on its merits and may enter its Order without a formal hearing. If comments or protests are filed within the deadline, NOTICE OF PETITION NOTICE OF MODIFIED PROCEDURE NOTICE OF COMMENT/PROTEST DEADLINE 2 the Commission will consider them and in its discretion may set the matter for hearing or may decide the matter and issue its Order based on the written positions before it. Reference IDAPA 31.01.01.204.

YOU ARE FURTHER NOTIFIED that written comments concerning Case No. PAC-E-07-13 should be mailed to the Commission and the Company at the addresses reflected below.

Commission Secretary	Dean Brockbank
Idaho Public Utilities Commission	Senior Counsel
PO Box 83720	Rocky Mountain Power
Boise, ID 83720-0074	201 S. Main Street, Suite 2300
	Salt Lake City, UT 84111
Street Address for Express Mail:	E-mail: dean.brockbank@pacificorp.com
472 W. Washington Street Boise, ID 83702-5983	Brian Dickman Manager, Idaho Regulatory Affairs Rocky Mountain Power 201 S. Main Street, Suite 2300 Salt Lake City, UT 84111 E-mail: <u>brian.dickman@pacificorp.com</u>

All comments should contain the case caption and case number shown on the first page of this document. Persons desiring to submit comments via e-mail may do so by accessing the Commission's home page located at <u>www.puc.idaho.gov</u>. Click the "Comments and Questions" icon, and complete the comment form, using the case number as it appears on the front of this document. These comments must also be sent to Rocky Mountain Power at the e-mail addresses listed above.

YOU ARE FURTHER NOTIFIED that the Petition in Case No. PAC-E-07-13 may be viewed at <u>www.puc.idaho.gov</u> by clicking on "File Room" and "Electric Cases," or can be viewed during regular business hours at the Idaho Public Utilities Commission, 472 W. Washington Street, Boise, Idaho and at the Idaho offices of Rocky Mountain Power.

YOU ARE FURTHER NOTIFIED that accompanying the Company's Petition in Case No. PAC-E-07-13 are certain documents, data, information, studies and other material relating to Rocky Mountain Power's calculation of avoided costs that are claimed by the Company to be trade secrets, proprietary and of a confidential nature. *Idaho Code* § 48-801(5). The submitted workpapers were used to develop the monthly price multipliers representing confidential pricing inputs and forecasts. Interested persons desiring to review the confidential information must file a Petition to Intervene with the Commission pursuant to Rules 72 and 73 of NOTICE OF PETITION NOTICE OF MODIFIED PROCEDURE NOTICE OF COMMENT/PROTEST DEADLINE 3

the Commission's Rules of Procedure, IDAPA 31.01.01.072-073 and contact Brenda Sorrell, Legal Secretary for Commission Staff's Attorney (208-334-0324) to sign a Confidentiality Agreement.

DATED at Boise, Idaho this

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day of June 2007.

Jewell Jean D. Jewell

Commission Secretary

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