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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
PACIFICORP DBA ROCKY MOUNTAIN) **CASE NO. PAC-E-13-14**
POWER FOR APPROVAL OF AN ELECTRIC)
SERVICE AGREEMENT WITH MONSANTO)
COMPANY.) **COMMENTS OF THE**
) **COMMISSION STAFF**
)

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Neil Price, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 32927 on November 19, 2013, in Case No. PAC-E-13-14, submits the following comments.

BACKGROUND

On October 31, 2013, PacifiCorp dba Rocky Mountain Power (“Rocky Mountain”) filed an Application for an Order approving an Electric Service Agreement (“ESA”) entered into between Rocky Mountain and Monsanto Company (“Monsanto”) (collectively referred to as the “Parties”). On November 12, 2013 Monsanto filed to join with Rocky Mountain in the Application requesting ESA approval. The parties request an effective date of January 1, 2014, the date the current electric service agreement will expire. The parties also request an initial term lasting through December 31, 2015, the date that Rocky Mountain Power’s Commission approved

rate plan ends (PAC-E-13-04). Rocky Mountain included a copy of the executed ESA as “**Confidential**” Attachment 1 to its Application.

STAFF ANALYSIS AND RECOMMENDATION

The proposed ESA is substantially the same as the current ESA except for changes made to Section 4: Payment for Power and Energy. Sections 4.1.1 and 4.1.2 were updated to include base rate changes ordered by the Commission in Case No. PAC-E-13-04.

The Parties also agreed that the proposed ESA should include a new Section 4.4 Interruptible Credit Annual True-up. This section resolves an on-going billing dispute between Monsanto and Rocky Mountain Power. The new terms provide for an annual true-up of the interruptible credit amount and an additional credit to be provided by Rocky Mountain to Monsanto of \$50,000 in 2014 and \$50,000 in 2015.

Staff recommends Commission approval of the ESA. It is reasonable to include the new rates in the proposed ESA and it is reasonable and desirable that differences in contract interpretation and unsettled billing disputes be resolved in a new ESA. Other Rocky Mountain customers are not impacted by the proposed ESA changes.

Respectfully submitted this 10th day of December 2013.



Neil Price
Deputy Attorney General

Technical Staff: Keith Hessing

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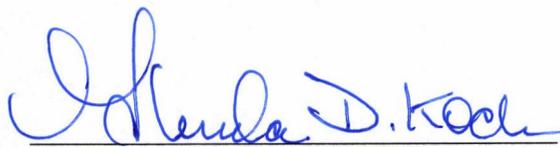
CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 10th DAY OF DECEMBER 2013, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. PAC-E-13-14, BY E-MAILING AND MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

DANIEL E SOLANDER
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