

Daniel E. Solander (ISB # 8931)
Yvonne R. Hogle (ISB #8930)
201 South Main Street, Suite 2400
Salt Lake City, Utah 84111
Telephone No. (801) 220-4014
Facsimile No. (801) 220-3299
daniel.solander@pacificorp.com

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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF ROCKY)	CASE NO. PAC-E-15-03
MOUNTAIN POWER FOR)	IPC-E-15-01
MODIFICATION OF TERMS AND)	AVU-E-15-01
CONDITIONS OF PURPA PURCHASE)	
AGREEMENTS AND FOR)	ROCKY MOUNTAIN POWER'S
MODIFICATION OF ITS AVOIDED)	ANSWER TO CLEARWATER
COST METHODOLOGY)	PAPER CORPORATION AND J.R.
)	SIMPLOT COMPANY'S JOINT
IN THE MATTER OF IDAHO POWER)	PETITION AND CROSS-PETITION
COMPANY'S PETITION TO MODIFY)	FOR CLARIFICATION OF ORDER
TERMS AND CONDITIONS OF)	NO. 33222
PROSPECTIVE PURPA ENERGY)	
SALES AGREEMENTS)	
)	
IN THE MATTER OF AVISTA)	
CORPORATION'S PETITION TO)	
MODIFY TERMS AND CONDITIONS)	
OF PROSPECTIVE PURPA)	
AGREEMENTS)	
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**ROCKY MOUNTAIN POWER'S ANSWER TO CLEARWATER
PAPER CORPORATION AND J.R. SIMPLOT COMPANY'S JOINT PETITION
AND CROSS-PETITION FOR CLARIFICATION OF ORDER NO. 33222**

Comes now, Rocky Mountain Power (or the "Company") pursuant to Rule 57 of the Commission's Rules of Procedure, 31.01.01.57 and the timeframe established in the March 13, 2015, letter from Don Howell to the Idaho Public Utilities Commission (the "Commission") informing the Commission of the outcome of the informal prehearing conference in this Case, and hereby submits its Answer to the Joint Petition and Cross-Petition for Clarification ("Joint Petition") filed by Clearwater Paper Corporation and J.R. Simplot Company ("Petitioners") in this proceeding.

1. On February 25, 2015, Petitioners filed their Joint Petition. In the Joint Petition, they recommend that the Commission amend Order No. 33222 to read as follows:

IT IS HEREBY ORDERED that effective February 5, 2015, and pending further order of the Commission, the maximum contractual term for Idaho Power's new intermittent (solar and wind power) PURPA contracts shall be five years.¹

2. In support of their recommendation, Petitioners claim that Idaho Power's Petition was "actually narrowly targeted at just wind and solar intermittent resources that exceed the published rate eligibility cap of 100 kW."² Petitioners also claim that "Idaho Power's Petition is only about its alleged difficulty in accepting and paying for long-term wind and solar PURPA QF projects."³

3. Although the Joint Petition was filed prior to Rocky Mountain Power's Petition for Modification of Terms and Conditions of PURPA Purchase Agreements and for Modification of its Avoided Cost Methodology, the Commission has combined the cases of the three Idaho utilities and Rocky Mountain Power therefore desires to provide a response to the Joint Petition.

¹ Joint Petition at 4.

² Joint Petition at 2.

³ Joint Petition at 3.

4. Rocky Mountain Power noted in its Petition that it has experienced a significant increase in QF pricing requests, and has no need for resources until 2028. The Company also stated that current Idaho avoided cost rates are adversely impacting customers and will continue to do so. There is nothing in Rocky Mountain Power's Petition that differentiates between an intermittent (solar or wind) QF resource and a non-intermittent resource.

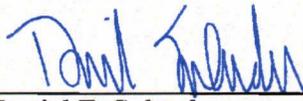
5. The Company's continued specific requests for relief in this case are: (1) an immediate reduction on a temporary basis, of the maximum contract term for PURPA contracts between QFs and the Company from 20 years to five years, pending final resolution of this case; (2) permanent reduction of the maximum contract term for PURPA contracts from 20 years to 3 years to be consistent with other Company policies; and (3) modification of the way the Company implements indicative pricing such that preparation of indicative pricing for QFs reflects all active QF projects in the pricing queue ahead of any newly proposed requests for indicative pricing. None of the Company's specific requests for relief differentiate between solar and wind QFs and non-intermittent resources.

6. Petitioners' claim that "[n]one of Idaho Power's arguments apply to base-load facilities utilizing waste heat, biomass, or industrial cogeneration such as Clearwater's base-load capacity non-intermittent QF project or Simplot's existing base-load industrial cogeneration facility." Whether or not this claim is upheld by the Commission, the converse is true for Rocky Mountain Power's Petition: the arguments and evidence included in Rocky Mountain Power's Petition apply to all resource types and not only to intermittent resources. Each of the claims with respect to the harm to ratepayers that is occurring apply equally regardless of the resource type.

WHEREFORE, Rocky Mountain Power respectfully requests that the Commission: (1) deny Petitioners Request to Clarify Order No. 33222 by adding “intermittent (solar and wind power)” to the ordering paragraph; and (2) clarify that the requested interim relief of five-year maximum length contracts does not apply to PURPA QF projects eligible for published rates.

DATED this 19th day of March 2015.

Respectfully submitted,
ROCKY MOUNTAIN POWER

A handwritten signature in blue ink, appearing to read "Daniel E. Solander", written over a horizontal line.

Daniel E. Solander
Yvonne R. Hogle

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

I hereby certify that on this 19th of March 2015, I caused to be served, via e-mail a true and correct copy of the foregoing document in Case Nos. PAC-E-15-03/IPC-E-15-01/AVU-E-15-01 to the following:

Donovan E. Walker
Idaho Power Company
1221 W. Idaho St. (83702)
PO Box 70
Boise, ID 83 707-0070
dwalker@idahopower.com
dockets@idahopower.com

Donald L. Howell, II
Daphne Huang
Idaho Public Utilities Commission
472 W, Washington (83702)
PO Box 83720
Boise, ID 83720-0074
don.howell@puc.idaho.gov
daphne.huang@puc.idaho.gov

Richard Malmgren
Senior Assistant General Counsel
Micron Technology, Inc.
800 S. Federal Way
Boise, ID 83716
remalmgren@micron.com

Frederick J. Schmidt
Micron Technology, Inc.
377 S. Nevada Street
Carson City, NV 89701
fschmidt@hollandhart.com

Peter J. Richardson
Gregory M. Adams
Richardson Adams, PLLC
515 N. 27th Street
Boise, ID 83702
peter@richardsonadams.com
greg@richardsonadams.com

Don Reading
6070 Hill Road
Boise, ID 83703
dreading@Zimindspring.com

Matt Vespa
Idaho Conservation League, Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
Matt.vespa@sierraclub.org

Leif Elgethun, PE, LEED AP
Intermountain Energy Partners, LLC
PO Box 7354
Boise, ID 83707
leif@sitebasedenergy.com

Dean J. Miller
McDevitt & Miller LLP
420 W. Bannock St.
Boise, ID 83702
joe@mcdevitt-miller.com

Kelsey Jae Nunez
Snake River Alliance
PO Box 1731
Boise, ID 83701
knunez@snakeriveralliance.org

Michael G. Andrea
Avista Corporation
1411 East Mission Ave. – MSC-23
Spokane, WA 99202
Michael.andrea@avistacorp.com

Clint Kalich
Avista Corporation
1411 East Mission Ave. – MSC-23
Spokane, WA 99202
Clint.Kalich@avistacorp.com
Linda.gervais@avistacorp.com

Irion Sanger
Sanger Law P.C.
1117 SW 53rd Avenue
Portland, OR 97215
irion@sanger-law.com

Scott Dale Blickenstaff
Amalgamated Sugar Company
1951 S. Saturn Way, Suite 100
Boise, ID 83702
sblickenstaff@amalsugar.com

C. Tom Arkoosh
Arkoosh Law Offices
802 W. Bannock St., Ste. 900 (83702)
PO Box 2900
Boise, ID 83701
tom.arkoosh@arkoosh.com

Eric L. Olsen
Racine, Olson, Nyc, Budge & Bailey, Chartered
201 E. Center
PO Box 1391
Pocatello, ID 83204-139 1
elo@iracinelaw.net

Scott Dale Blickenstaff
The Amalgamated Sugar Co LLC
1951 S. Saturn Way, Suite 100
Boise, ID 83702
sblickenstaff@amalsugar.com

Ted Weston
Rocky Mountain Power
201 S. Main Street, Suite 2300
Salt Lake City, UT 84111
Ted.weston@pacificorp.com

Yvonne Hogle
Rocky Mountain Power
201 S. Main Street, Suite 2300
Salt Lake City, Utah 84111
Yvonne.hogle@pacificorp.com

Erin Cecil
Arkoosh Law Offices – Electronic Copies Only
Erin.cecil@darkoosh.com

Anthony Yankel
29814 Lake Road
Bay Village, OH 44140
tony@yankel.net

Data Request Response Center – Electronic Copies
Only
PacifiCorp
datarequest@pacificorp.com

Daniel Solander
Rocky Mountain Power
201 S. Main Street, Suite 2300
Salt Lake City, Utah 84111
Daniel.Solander@pacificorp.com


Carrie Meyer
Supervisor, Regulatory Operations