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IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorneys for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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

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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.<sup>1</sup>

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."<sup>2</sup> 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."<sup>3</sup>

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.

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<sup>1</sup> Joint Petition at 4.

<sup>2</sup> Joint Petition at 2.

<sup>3</sup> Joint Petition at 3.