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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE
APPLICATION OF ROCKY MOUNTAIN
POWER FOR MODIFICATION OF
TERMS AND CONDITIONS OF PURPA
PURCHASE AGREEMENTS AND FOR
MODIFICATION OF ITS AVOIDED
COST METHODOLOGY**

**CASE NO. PAC-E-15-03
IPC-E-15-01
AVU-E-15-01**

**IN THE MATTER OF IDAHO POWER
COMPANY'S PETITION TO MODIFY
TERMS AND CONDITIONS OF
PROSPECTIVE PURPA ENERGY SALES
AGREEMENTS**

**ROCKY MOUNTAIN POWER'S
OBJECTION AND MOTION IN
OPPOSITION TO ECOPLEXUS INC.'S
PETITION TO INTERVENE**

**IN THE MATTER OF AVISTA
CORPORATION'S PETITION TO
MODIFY TERMS AND CONDITIONS OF
PROSPECTIVE PURPA AGREEMENTS**

COMES NOW, Rocky Mountain Power ("Rocky Mountain Power" or "Company"), pursuant to Idaho Public Utilities Commission Rules of Procedure 73 and 75, and supports and joins Idaho Power Company's Objection and Motion in Opposition ("Idaho Power Motion") to Ecoplexus, Inc.'s ("Ecoplexus") Petition to Intervene ("Intervention Petition"), based on the following:

PROCEDURAL HISTORY

Rocky Mountain Power filed a Petition and the supporting testimony of two witnesses, Paul Clements and Brian Dickman, with the Commission March 2, 2015 requesting certain modifications to the terms and conditions of its power purchase agreements.

On March 13, 2015, the Commission issued Order No. 33250, by which it consolidated the Company's and Avista Corporation's ("Avista") petitions with Idaho Power's Case No. IPC-E-15-01, which was open pursuant to Idaho Power Company's Petition requesting similar modifications to its own terms and conditions within its power purchase agreements. This Order also directed that all parties granted intervenor status in Idaho Power's case would be designated as parties in Rocky Mountain Power's and Avista's cases, and that any other party desiring to intervene in the Rocky Mountain Power or Avista cases should file petitions to intervene no later than March 27, 2015.

On March 18, 2015, the Commission issued Order No. 33253 to, among other things; adopt a procedural schedule in the combined cases. The Commission ordered deadlines in the case as follow: Staff and Intervenor direct testimony – April 23, 2015; Staff and Intervenor rebuttal testimony – May 14, 2015; utilities rebuttal testimony – June 11, 2015; technical hearing – June 29 -30, 2015, and July 1, 2015. On May 7, 2015, the Commission issued a Notice of Public Customer Hearings for this case, scheduling two public customer hearings as follow: in-person hearing – June 24, 2015; telephonic hearing – June 30, 2015.

On May 12, 2015, Ecoplexus submitted its Intervention Petition, approximately 1.5 months from the March 27, 2015 intervention deadline established in the Rocky Mountain Power