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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Ecoplexus, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) Case No. IPC-E-15-01
COMPANY’S PETITION TO MODIFY)
TERMS AND CONDITIONS OF) MOTION TO LATE FILE THE DIRECT
PROSPECTIVE PURPA ENERGY) PREFILED TESTIMONY OF ERIK A.
SALES AGREEMENTS) STUEBE
)
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)

COMES NOW Ecoplexus, Inc., a Delaware corporation (“Ecoplexus”) and files this Motion to Late File the Direct Prefiled Testimony of Erik A. Stuebe in the above matter. As discussed below, Ecoplexus has a direct and substantial interest in these proceedings.

Ecoplexus only recently learned of this open proceeding and its right to provide testimony and participate. Despite having proposed photovoltaic solar generation qualifying facilities in Idaho Power Company’s and PacifiCorp’s d/b/a Rocky Mountain Power’s service territories, Idaho Power never informed Ecoplexus of these proceedings in correspondence it sent to Ecoplexus. Similarly, Rocky Mountain Power’s letter communications in late March and early April stated unequivocally that “[i]n a March 9, 2015, Idaho Public Utilities Commission (“Commission”) bench order in Case No. PAC-E-15-03, the Commission reduced the maximum

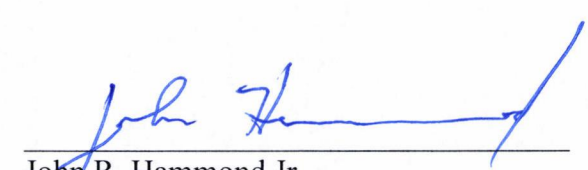
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allowed QF contract term from 20 years to 5 years. On March 13, 2015, Idaho Public Utilities Commission (“Commission”) issued written Order No. 33250 in Case No. PAC-E-15-03 confirming their bench order effective as of March 9, 2015.” Per the actual Commission Order No. 33250, they importantly failed to note that this was “pending further order of the Commission” and “subject to any clarifying order resolving pending petitions to clarify in the Idaho Power case.” Finally, neither utility advised Ecoplexus that they had an opportunity to intervene in this case. The relevant letters are attached to this Motion as **Exhibit A**.

Further, the filing of the Direct Prefiled Testimony of Erik A. Stuebe will not broaden the issues, delay the proceedings or result in prejudice to any party.

WHEREFORE, Ecoplexus respectfully requests that this Commission grant its Motion to Late File the Direct Prefiled Testimony of Erik A. Stuebe. Such testimony has been filed contemporaneously with this Motion.

DATED this 13th day of May 2015



John R. Hammond Jr.
Attorney for Ecoplexus, Inc.