

McDowell Rackner & Gibson PC



ADAM LOWNEY
Direct (503) 595-3926
adam@mcd-law.com

August 22, 2011

VIA ELECTRONIC FILING AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Re: Docket AR 558

Idaho Power Company ("Idaho Power" or "Company") submits the following comments relating to the proposed revisions to the Public Utility Commission of Oregon's ("Commission") Division 084 rules related to the solar photovoltaic pilot programs created by House Bill 3039.

Idaho Power supports Staff's proposed revisions to the rules. The Company believes that these revisions appropriately update the rules to reflect the changes that have occurred in the pilot programs, address issues that have arisen as the programs mature, and better organize the rules to provide clarity to program participants and stakeholders.

Idaho Power appreciates the opportunity to submit these comments.

Very truly yours,

A handwritten signature in black ink that reads "Adam Lowney". The signature is fluid and cursive, with the first name being more prominent.

Adam Lowney

cc: Service List

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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket AR 558 on the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known email address indicated below.

J. Richard George
Portland General Electric
richard.george@pgn.com

Tim Cowart
Advanced Energy Systems
tim@aesrenew.com

RJ Johnson
Nextera Energy Resources
Rj.johnson@nexteraenergy.com


Josh Harman
Sun Storage
josh@sunstorage.org

Jay Tinker
Portland General Electric
Pge.opuc.filings@pgn.com

Peter Blood
Natural Capital Partners LLC
peter@naturalcapitalpartners.us

Adam Schumaker
Renewable Northwest Project
adam@rnp.org

DATED: August 22, 2011



Wendy McIndoo
Office Manager