

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
UM 1610

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into Qualifying Facility
Contracting and Pricing.

Renewable Energy Coalition's

OBJECTION TO IDAHO POWER'S
APPLICATION FOR APPROVAL OF
AVOIDED COST RATES, SCHEDULE
85, AND STANDARD CONTRACTS IN
COMPLIANCE WITH ORDER NO. 14-
058.

For several years Renewable Energy Coalition ("REC") has been concerned that the electric utilities subject to the Commission's jurisdiction have been interpreting and applying the policies set forth in Section 210 of the Public Utilities Regulatory Policies Act of 1978, 92 Stat. 3117, in an unpredictable and inconsistent manner, often to the detriment of qualifying facilities. This concern has led to the instant Objection.

On May 19, Idaho Power Company ("Idaho Power") filed its "Application for Approval of Avoided Cost Rates, Schedule 85, and Standard Contracts in Compliance with Order No. 14-058." In that filing, Idaho Power requested (i) that its pending 2013 IRP filing be the basis for its avoided-cost prices, and (ii) that the Commission approve numerous changes in standard contract terms and conditions. Community Renewable Energy Association ("CREA") has filed an objection to Idaho Power's filing, and because that filing illustrates both unpredictability and inconsistency, Renewable Energy Coalition ("REC") joins in that objection insofar as it relates to the two issues set forth above. Specifically, REC submits that Idaho Power's filing should be held in abeyance pending the approval of Idaho Power's pending Integrated Resource Plan ("IRP") in order that its new avoided-cost prices track outcome of the Commission's IRP

determinations. Addressing the second issue, any changes related to in the Standard Contract suggested by Idaho Power in its filing are not authorized by Order No. 14-058. On this issue, REC joins in CREA's comments regarding the impropriety of those changes, and notes that those issues have been reserved for Part II of this docket and thus should not be included in any Commission approval of new avoided-cost prices. To do otherwise would be to sanction both unpredictability and inconsistency.

For the foregoing reasons - the same reasons that led to REC's Motion to Suspend in response to Pacific Power's Advice No. 14-007 - Renewable Energy Coalition objects to Idaho Power's compliance filing and requests that the proposed new avoided-cost prices not be approved until the Commission approves Idaho Power's pending IRP. Assuming that the Commission does decide to approve the suggested avoided-cost prices, Renewable Energy Coalition submits that the proposed changes to the Standard Contract should be rejected at this time; this matter can best be considered upon completion of Part II of this docket.

DATED this 21st day of May, 2014.

Respectfully submitted,

A handwritten signature in cursive script that reads "Thomas H. Nelson".

Thomas H. Nelson, OSB 78315
Attorney for Renewable Energy Coalition

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of RENEWABLE ENERGY COALITION'S OBJECTION TO IDAHO POWER'S APPLICATION FOR APPROVAL OF AVOIDED COST RATES, SCHEDULE 85, AND STANDARD CONTRACTS IN COMPLIANCE WITH ORDER NO. 14-058 on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

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DATED at Zigzag, Oregon, this 21st day of May, 2014.



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