

McDowell Rackner & Gibson PC



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September 21, 2015

VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center
Public Utility Commission of Oregon
PO Box 1088
Salem, OR 97308-1088

**Re: UM 1731 – In the Matter of PACIFIC NORTHWEST SOLAR, LLC v. IDAHO POWER
COMPANY**

Attention Filing Center:

Attached for filing in the above-captioned case is an electronic copy of a Stipulated Motion to Withdraw Complaint and Close Docket.

Please contact this office with any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Wendy McIndoo".

Wendy McIndoo
Office Manager

Attachments

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UM 1731**

4 In the Matter of
5 PACIFIC NORTHWEST SOLAR, LLC,
6 Complainant,
7 v.
8 IDAHO POWER COMPANY,
9 Defendant.

**STIPULATED MOTION TO WITHDRAW
COMPLAINT AND CLOSE DOCKET**

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11 Pursuant to OAR 860-001-0420, Idaho Power Company (Idaho Power) and Pacific
12 Northwest Solar LLC (PNW) (together, the Parties) move the Public Utility Commission of
13 Oregon (Commission) to dismiss the Complaint brought by PNW under the Public Utility
14 Regulatory Policy Act (PURPA). In that Complaint, PNW alleged that Idaho Power should
15 be required to enter into standard avoided cost contracts to purchase generation from nine
16 proposed solar projects.

17 Since PNW filed its Complaint, the Parties have entered into discussions wherein
18 they have negotiated terms and conditions under which PNW will sell and Idaho Power will
19 purchase the output of the projects named in the Complaint. PNW ultimately decided not
20 to go forward with three of the nine projects for business reasons, and the Parties have
21 entered into fully executed Energy Sales Agreements for the remaining six.

22 All six of the projects are over the 3 MW interim cap adopted by the Commission in
23 UM 1725, and therefore the negotiated prices were calculated using Idaho Power's
24 Integrated Resource Planning (IRP) methodology. The term of each contract is 20 years.

25 The executed Energy Sales Agreements will be filed with the Commission in
26 Docket No. RE 141.

1 Because the parties have resolved their differences under mutually agreeable
2 terms that are consistent with their rights and obligations under the PURPA, they request
3 that the Commission issue an order dismissing the Complaint.

4 DATED: September 21, 2015.

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MCDOWELL RACKNER & GIBSON PC

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Lisa F. Rackner

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IDAHO POWER COMPANY

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