

# McDowell Rackner & Gibson PC



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May 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 1725 – In the Matter of IDAHO POWER COMPANY Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term**

Attention Filing Center:

Idaho Power requests that the enclosed Errata – page 1 of Idaho Power Company's Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term be substituted for page 1 of the Company's original Application filed on April 24, 2015.

A copy of this filing has been served on all parties to Docket UM 1725 via electronic mail as indicated on the attached certificate of service.

Please contact this office with any questions.

Very truly yours,

Sharon Cooper  
Legal Assistant

Enclosures

cc: UM 1725 Service List

**ERRATA PAGE 1 – REDLINED VERSION**

**IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION TO LOWER  
STANDARD CONTRACT ELIGIBILITY CAP AND  
TO REDUCE THE STANDARD CONTRACT TERM**

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BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM \_\_\_\_\_

In the Matter of  
IDAHO POWER COMPANY  
Application to Lower Standard Contract  
Eligibility Cap and to Reduce the  
Standard Contract Term.

APPLICATION TO LOWER STANDARD  
CONTRACT ELIGIBILITY CAP AND TO  
REDUCE THE STANDARD CONTRACT  
TERM

I. INTRODUCTION

Pursuant to OAR 860-001-0400(2) and ORS 758.535(2) Idaho Power Company (“Idaho Power”) respectfully requests that the Public Utility Commission of Oregon (“Commission”) issue an order modifying the terms and conditions under which Idaho Power enters into power purchase agreements with Qualifying Facilities (“QFs”) pursuant to the Public Utility Regulatory Policies Act of 1978 (“PURPA”). Specifically, Idaho Power requests that the Commission: (1) Reduce the eligibility cap applicable to standard contracts to 100 kilowatts (“kW”) for wind and solar QFs; and (2) Reduce the contract term from 20 years to two years for wind and solar all QF projects above 100 kW.

Idaho Power understands that the Commission has reaffirmed its decisions to set the standard contract eligibility cap at 10 megawatts (“MW”) and the contract term for all resources at 20 years. However, since those decisions were issued, Idaho Power’s circumstances have changed significantly, requiring the Commission to revisit its earlier conclusions—**as they apply to Idaho Power Company**. Specifically, since the issuance of Order No. 14-058 in docket UM 1610, the PURPA generation on the Company’s system has nearly doubled. The Company has executed contracts for the purchase of 461 MW of

**ERRATA PAGE 1 – CLEAN VERSION**

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COMPANY'S APPLICATION TO LOWER  
STANDARD CONTRACT ELIGIBILITY CAP AND  
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BEFORE THE PUBLIC UTILITY COMMISSION  
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document in Docket UM 1725 of the following named person(s) on the date indicated below by email addressed to said person(s) at his or her last-known address(es) indicated below:

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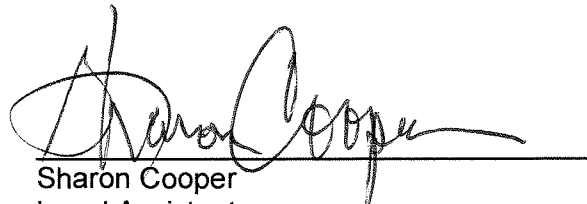
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Dated: May 21, 2015

  
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