

ELLEN F. ROSENBLUM
Attorney General



FREDERICK M. BOSS
Deputy Attorney General

DEPARTMENT OF JUSTICE
GENERAL COUNSEL DIVISION

July 16, 2015

VIA ELECTRONIC MAIL ONLY

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street, Suite 100
P.O. Box 1088
Salem, OR 97308-1088

Re: *In the Matter of IDAHO POWER COMPANY, Application to Lower Standard Contract Eligibility Cap and to Reduce the Standard Contract Term, for Approval of Solar Integration Charge, and for Change in Resource Sufficiency Determination*
OPUC Docket No.: UM 1725
DOJ File No.: 330030-GN0192-15

Filing Center:

Enclosed for filing with the Commission today is the OREGON DEPARTMENT OF ENERGY'S REPLY TO IDAHO POWER COMPANY'S MOTION FOR CLARIFICATION.

Sincerely,

A handwritten signature in blue ink, appearing to read "Renee M. France".

Renee M. France
Senior Assistant Attorney General
Natural Resources Section

Enclosures
RMF:jrs/#6661215

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1725**

In the Matter of)	
)	
IDAHO POWER COMPANY)	OREGON DEPARTMENT OF
)	ENERGY REPLY TO MOTION
)	FOR CLARIFICATION
Application to Lower Standard Contract)	
Eligibility Cap and to Reduce the Standard)	
Contract Term, for Approval of Solar)	
Integration Charge, and for Change in)	
Resource Sufficiency Determination.)	

Pursuant to OAR § 860-001-0420 and the Administrative Law Judge’s July 9, 2015 Ruling, the Oregon Department of Energy (“ODOE”) submits this reply to Idaho Power Company’s (“Idaho Power”) motion for clarification of the Oregon Public Utility Commission’s (the “Commission”) recent Order No. 15-199. ODOE takes no position on the first issue raised by Idaho Power’s motion seeking clarification on whether qualifying facilities (“QFs”) can revise their size and continue to be treated as the same project.

With regard to the second issue raised by Idaho Power’s motion, ODOE supports the company’s request that the Commission consider solar integration charges in Docket UM 1725, with the understanding that Commission orders under subsequent dockets may necessitate future changes to Idaho Power’s solar integration charges. ODOE also agrees with Idaho Power’s position that, given the parties’ previous agreement to an Issue List for Phase II of UM 1610 that did not include solar integration charges, as well as the fact that parties have already concluded the opening testimony for Phase II with response testimony due July 24, 2015, “it seems unlikely that the issue

[of solar integration charges] will reach any final resolution in Phase II of UM 1610.”¹
ODOE respectfully requests that the Commission reconsider its direction to the parties to address in Docket UM 1610 the level of solar integration charges to incorporate into avoided cost rates, and that instead the Commission use the outcomes of a current docket, UM 1716 (Investigation to Determine Resource Value of Solar), to inform its decision about the issue of solar integration charges, as well as potentially using the dockets UM 1725 and UM 1734.

Dated this 16th day of July 2015.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General



Renee M. France, OSB #004472
Senior Assistant Attorney General
Attorney for the Oregon Department of
Energy

¹ *Idaho Power Company's Motion for Clarification*, Docket UM 1725, Order No. 15-199 (July 8, 2015)