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October 25, 2016

**VIA HAND DELIVERY**

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702

Re: Case No. IPC-E-16-14  
New Tariff Schedule 63, A Community Solar Pilot Program  
Idaho Power Company's Reply Comments

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Reply Comments.

Very truly yours,



Lisa D. Nordstrom

LDN/kkt

Enclosures

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UTILITIES COMMISSION

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	
COMPANY'S APPLICATION TO	)	CASE NO. IPC-E-16-14
APPROVE NEW TARIFF SCHEDULE 63,	)	
A COMMUNITY SOLAR PILOT	)	IDAHO POWER COMPANY'S
PROGRAM.	)	REPLY COMMENTS
	)	

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Idaho Power Company ("Idaho Power" or "Company") respectfully submits the following Reply Comments in response to comments filed by the Idaho Public Utilities Commission ("Commission") Staff ("Staff"), the Idaho Conservation League ("ICL"), the Snake River Alliance ("SRA"), and Sierra Club on October 18, 2016. In addition, there were four public comments received. Idaho Power appreciates the comments provided in this case and notes that all comments recommend that the Commission approve the Settlement Stipulation submitted in this matter by the parties ("Parties") on September 16, 2016. In these Reply Comments, the Company would like to clarify an issue

identified in Staff's Comments and respond to the concerns raised in a public comment by Kyle Nelson.

**I. Cost Recovery of the Project if it is Not Fully Subscribed**

After reviewing Staff's Comments, Idaho Power contacted Staff to ensure both parties viewed the cost recovery language in the Settlement Stipulation as only providing for a pass through of the cost of under-subscription resulting from participants who elect to pay through the 24-month option but do not complete all 24 payments. Idaho Power discussed the issue with Staff members and understands that Staff is in agreement with the Company's interpretation of the Settlement Stipulation language.

**II. The Participant Will be Able to View Solar Production Information From a Reliable Source**

Through the public comment process, Kyle Nelson expressed concern over the application of losses and a participant's ability to verify the production from the community solar array as "the amount of power the solar farm produces is vital in determining the amount of credit a consumer receives."<sup>1</sup> The Company recognizes this concern and will be providing the array's performance data on the Idaho Power website at [www.idahopower.com/solar](http://www.idahopower.com/solar). Further, as described in the testimony of Company witness Dave Angell, on a monthly basis the project's total metered energy will be reduced by the line loss percent of 3.3 percent.<sup>2</sup> Subsequently, each Community Solar Pilot Program ("Program") participant will receive a proportionate share of the monthly loss-adjusted energy based on their level of subscription which will be displayed on their monthly bill.

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<sup>1</sup> Public Comment of Kyle Nelson dated 10/03/16.

<sup>2</sup> Angell Direct Testimony, p. 12

### **III. CONCLUSION**

Idaho Power appreciates the opportunity to respond to comments filed in this case and would like to reiterate its appreciation of the collaborative effort between the Company, Commission Staff, and other parties to consider and discuss the merits of the Company's Application and to reach mutually agreeable terms for the Program. Idaho Power respectfully requests that the Commission issue an order in a timeframe that will allow the Company to launch its marketing campaign prior to the holiday season.

DATED at Boise, Idaho, this 25<sup>th</sup> day of October 2016.



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LISA D. NORDSTROM

Attorney for Idaho Power Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of October 2016 I served a true and correct copy of IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

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