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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY'S APPLICATION FOR)
APPROVAL OF NEW TARIFF)
SCHEDULE 63, A COMMUNITY)
SOLAR PILOT PROGRAM.)

CASE NO. IPC-E-16-14
COMMENTS OF THE IDAHO
CONSERVATION LEAGUE

The Idaho Conservation League appreciates Idaho Power's Community Solar Pilot proposal. This pilot project is an outgrowth of the 2009 and 2015 Integrated Resource Plans and provides a potential opportunity to meet evolving customer expectations for energy options. We agree that a community solar program should offer an avenue for customers whose access to energy resources is otherwise limited either physically and financially, and that such a program should be neutral with respect to non-participants to the extent possible. However, based on our extensive review of Idaho Power's proposal, as well as Community Solar programs in other states, we recommend certain improvements to the Company's proposal in order to reach that potential.

There are many positive aspects of the proposal—specifically the 15% shareholder contribution, opening the pilot to all customer classes, and the total cost of the pilot project. However, we believe three aspects deserve closer consideration of possible changes that will maintain the essence of the pilot while encouraging greater participation: the method for paying the subscription fee, the value of the solar energy credits, and the timeline for soliciting subscriptions. ICL's comments begin by describing the program goals and guiding parameters. The second section recommends changes to three parts of the proposal. ICL looks forward to working with all parties to find a mutually agreeable solution.

I. Goals and Parameters for Community Solar

As explained in Idaho Power's 2015 IRP, the Department of Energy "states the primary goal of community solar is to increase access to solar energy and reduce the upfront costs for

participants.”¹ Building on this definition, we agree with Idaho Power’s description of the reasons why “for many customers, direct ownership and operation of solar resources is not desirable or feasible.”² Idaho Power goes on to describe two primary barriers that limit many customers’ ability to invest their own money to meet their own energy needs:

1. Direct ownership of a solar system “requires upfront capital costs as well as long-term expenses and liabilities associated with system operations and maintenance.”
2. “[R]ooftop or ground mounted installations are feasible only for certain property owners” and not renters, multi-unit dwellers, or those with unsuitable rooftops or properties.

And we agree with the goal that a Community Solar Pilot Program should be “designed as an alternative to customers who fall into the various categories mentioned above.”³ At the same time, we agree with the overall premise that the costs of the program are borne by subscribers and not non-subscribers. Resolving these somewhat competing goals – reducing upfront costs and providing voluntary options for some customers without impacting other customers – requires a carefully crafted pilot program.

Our concern is that Idaho Power’s proposed lump sum, upfront subscription fee, and inaccurately valued solar energy credits, will not surmount the economic barrier which limits the ability to participate regardless of whether solar is physically feasible for a customer. In short, without providing a monthly payment option and accurately valuing the solar energy credits, the pilot will not address the two primary barriers Idaho Power identifies.

To better address the barriers Idaho Power identifies in their Application, while holding non-subscribers harmless, ICL recommends changes to three parts of the proposal:

1. Devise a monthly payment system for a long-term subscription
2. Accurately value the solar energy credits.
3. Amend the timeline for acquiring subscribers before building the project

II. Proposed Changes

A. The Subscription Fee

¹ Idaho Power 2015 IRP at 7.

² Application at 2; Larkin at p. 4, ln. 22 – p.5, ln. 6.

³ Application at 2; Larkin at p. 5, ln. 7-9.

1. *The lump sum, upfront payment for subscriptions will greatly limit residential participation*

We acknowledge the parameters of ensuring subscribers cover program costs while providing options to meet changing energy preferences. Idaho Power's proposal to collect the entire cost of the project upfront, through lump sum subscription fees, clearly ensures subscribers will cover the program costs and completely insulates non-subscribers and shareholders from even a modicum of risk. But this design feature presents the same barrier to participation that a Community Solar pilot is intended to address, the need for customers to incur large upfront capital costs.

Many Idaho families are unlikely to have an extra \$740⁴ available to subscribe to the program. Unfortunately, we do not have much Idaho specific information on individual disposable income. The Board of Governors of the Federal Reserve System periodically surveys Americans on their economic well-being. The most recent report from May of 2016 provides valuable insights to inform our collective judgment of whether the typical Idahoan can afford the proposed \$740 subscription fee.⁵

According to the Federal Reserve, 31% of American families are “struggling to get by’ or are ‘just getting by.’”⁶ Digging a bit deeper into this, “single parents, racial and ethnic minorities, and respondents with lower levels of income or education are all more likely to report that they were having some level of difficulty getting by financially.”⁷ The economic well-being report defines lower income as \$40,000 in annual household income⁸, very close to the median household income in Idaho of \$47,334.⁹ When asked to describe their financial difficulty, families in the \$40,000 range report that paying monthly bills as their primary financial challenge.¹⁰

This information is highly relevant to Idaho. According to the Census Bureau, only 25% of Idahoans have a college education and the median household income is \$47,334.¹¹ Meanwhile, nationwide 46% of Americans have at least a college degree¹², while the national median

⁴ Larkin at p 11, ln 3-6.

⁵ The Board of Governors of the Federal Reserve System, *Report on the Economic Well-Being of U.S. Households in 2015*, (May 2016). Available at: <http://www.federalreserve.gov/2015-report-economic-well-being-us-households-201605.pdf>

⁶ Id at 1.

⁷ Id at 7.

⁸ Id.

⁹ Data available at: <http://www.census.gov/quickfacts/table/INC110214/16>

¹⁰ *Economic Well-Being Report* at 11.

¹¹ Data available at: <http://www.census.gov/quickfacts/table/INC110214/16>

¹² National Center for Educational Statistics information available at: <https://nces.ed.gov/fastfacts/display.asp?id=27>

household income is \$53,657.¹³ That Idaho has lower education levels and lower median incomes than the national average is highly relevant to assessing whether Idaho Power customers are likely to be able to participate in a program with substantial upfront costs in order to receive long-term benefits. According the Federal Reserve, “higher-income individuals are concerned about their long-run financial health, whereas those lower in the income distribution may be unable to focus on the long-run concerns as they struggle to meet their short-term financial obligations.”¹⁴

The inability of many Idaho families to come up with the \$740, lump-sum subscription fee is further revealed by comparing income to spending. For families at or below \$40,000, 69% of them report spending the same or more than their monthly income, essentially living month to month.¹⁵ Slightly wealthier families are not much better off with 45% of families in the \$40,000 to \$100,000 range essentially living month to month.¹⁶ And possibly most telling, when asked if they could cover a \$400 emergency expense, 46% of all respondents, regardless of income, reported, “they either could not pay the expense or would borrow or sell something to do so.”¹⁷

In sum, with Idaho’s generally low household incomes the available evidence shows that a lump-sum subscription fee is simply out of the question financially for many Idaho Power customers. ICL shares the same goal identified by Idaho Power in the Application, to design a Community Solar Pilot that surmounts the upfront capital barrier required of direct ownership of solar resources. Available evidence suggests that, for many Idaho families, a \$740 lump-sum payment for a subscription is as much of a burden as purchasing a full solar system themselves. Accordingly, Idaho Power’s proposed lump sum payment does not answer one of the two primary challenges that Community Solar is intended to address.

2. ICL’s proposed method to pay monthly for a long-term subscription

To surmount the barrier of upfront, lump-sum payments ICL proposes a monthly subscription option for participants. We recognize that moving to a monthly subscription fee raises two issues. First, because participants are not funding the project upfront, some financing costs may be necessary. Second, a monthly subscription may provide less assurance that program costs will not be born by non-subscribers. However, the benefit of providing customers a more

¹³ U.S. Census Bureau, *Income and Poverty in the United States: 2014* (September 2015) at page 5. Available at: <https://www.census.gov/content/dam/Census/library/publications/2015/demo/p60-252.pdf>

¹⁴ Economic Well Being Report at 11.

¹⁵ Id at 17, Figure 6.

¹⁶ Id.

¹⁷ Id at 22.

realistic means to participate can balance against the risk and administrative costs of participants entering and leaving the program. To be clear, ICL does not challenge the overall cost of a subscription, and we agree that participants should obligate themselves to a term and face appropriate exit fees for early termination. Our proposal is intended to devise a method for monthly payment of a long-term subscription.

ICL's proposal has several parts outlined below.

- We propose a monthly subscription fee based on the upfront, lump sum payment divided by five years. This results in an annual amount of \$148, and a monthly fee, over the five-year term, of about \$12.33. Based on the demographic information available today, ICL believes this monthly fee would substantially increase the ability of customers to participate in the pilot while allowing for some additional costs due to financing the project.
- To address the risk of customers withdrawing from the pilot before the five-year payment term, ICL proposes a sliding scale of exit fees. However, without quantifying the risk of early termination, stakeholders cannot determine an appropriate exit fee.¹⁸ Accordingly, we recommend the Commission direct Idaho Power to continue to work with stakeholders to quantify the actual risk of early termination and the appropriate scale of exit fees to mitigate this risk.
- As part of the exit fee determination, ICL recommends that, if the exiting participant can identify an eligible customer to assume their subscription, the exit fee be waived. This is fair because transferring the subscription to another participant ensures subscribers will continue to cover the cost of the project. ICL notes Idaho Power proposes to allow participants to transfer subscriptions to new service points for no fee, and transfer subscriptions to new participants for a nominal fee.¹⁹ ICL's proposal merely extends these two features to the monthly payment system.
- To track potential new subscribers ICL proposes that Idaho Power maintain a waiting

¹⁸ ICL asked Idaho Power for all analysis of under subscription risk. The Company responded that since their proposal eliminates risk they did not attempt to quantify the risk or consider non-lump sum payment options other than the extreme example of 20 year long repayment with no exit fees for subscribers.

¹⁹ Application at 5.

list of eligible and interested customers. This wait list will assist subscribers in finding a transferee. And this waiting list will track the customer demand for additional Community Solar projects.

- Of course, any customer willing and able to pay the entire subscription up-front should be able to do so.
- To limit the cost of financing the project ICL recommends the Commission allow Idaho Power to provide the upfront capital, create a regulatory asset with a carrying charge, and then apply monthly subscription fees to pay down the investment. Because this project will have dedicated subscribers and a five-year repayment on an asset with a 25-year lifespan, ICL submits the risk profile for this pilot is less than the general risk profile of Idaho Power. Accordingly, the carrying charge should be some amount less than the Company's weighted cost of capital.

B. The Solar Energy Credit Valuation

1. Idaho Power's proposed embedded cost of service method is not accurate and the justification to apply the method is not compelling

ICL looks forward to working with Idaho Power and others to promote the Community Solar Pilot and attract subscribers. We regularly communicate with over 25,000 supporters, the majority of which are Idaho Power customers, and are likely prospects for subscribing to the project. We look forward to recommending participation in this project to this vast pool of potential subscribers. But in order to maintain our credibility and serve the public interest the economic proposition of the project must be fair and accurate before we can recommend anyone subscribe to the project.

Idaho Power's proposed embedded cost of service method is simply not an accurate way to determine the value of the solar energy credit. The embedded cost calculation is based on the average cost to the Company of serving load generally, but not on the cost of serving load over the hours on which the solar project will generate power. Assuming nighttime costs are less than daytime costs, including nighttime into the average inaccurately depresses the solar energy credit. Further, the embedded cost method ignores the project will provide capacity to the system and thereby free up existing capacity, both generation and transmission, to provide an opportunity for off system sales during the resource sufficiency period and defer long-term capacity needs

over the 25 year life of the project. To the extent subscribers reduce demands on fossil generation, all customers will see fewer environmental compliance costs like pollution control chemicals and coal ash handling costs. And any reduced dependence on wholesale energy or gas prices reduces power cost volatility to the benefit of all customers. While these values may be small individually, accuracy matters, and collectively they can make the economic proposition to subscribers more palatable. Further, under valuing the solar credit causes non-subscribers to receive benefits paid for by subscribers. The embedded cost method is simply an inaccurate way to determine the value of a generation resource.

Beyond inaccuracy, Idaho Power's justification for applying a cost of service method is not compelling. First, ICL is unaware of any Idaho Commission order approving the use of cost of service to determine the value of a generation resource. This is not surprising since the cost of service is a method to assign costs to customers and was never designed to assess the value of resources.

Second, comparing the value of a new, marginal resource to the embedded energy-related cost of the existing system is illogical. The concept of economic dispatch dictates that, in practice, a new marginal resource will displace the highest cost existing marginal resource. Or put more simply, if the Community Solar project is built and begins delivering energy, this will not displace all other resources equally; rather will displace the resource at the top of the cost stack. The embedded cost of service method ignores this fact.

Third, Idaho Power's specific justifications for using the embedded cost of service are not persuasive. Mr. Larkin states: "Providing participants with a bill credit based on embedded energy costs reflects the general concept the participants are choosing to subscribe to the community solar facility for a portion of their electricity supply rather than receiving electricity generated from the Company's overall system."²⁰ If a Community Solar subscriber is not relying on the overall system the logical next step is to use the existing, agreed upon, and published method for determining the value to all customers of not receiving electricity generated from the Company's overall system – the Demand Side Management Alternate Costs. Instead of using this existing framework, Idaho Power proposes using a novel, opaque method developed to assign system costs through a practice commonly referred to having a healthy dose of art along with some science.

²⁰ Larkin at p.13, ln. 14 – ln. 19.

When an individual chooses to not rely on the system through efficiency, we calculate the benefit to all other customers using the DSM avoided costs. Similarly, when a Community Solar subscriber relies on the project instead of the overall system, the value of this change to all other customers should be calculated by applying the stream of DSM avoided costs to the load shape of the solar subscription credit. Using the DSM avoided costs is further bolstered by the limitation that subscribers can only rely on Community Solar up to 100% of their prior year energy usage, thereby making clear this program allows subscribers to meet their own energy needs and not force excess generation onto other customers.²¹ The DSM avoided costs are the appropriate methodology to determine the value to all customers of a subscriber reducing their demand on the existing system.

Idaho Power's further justifications for using an embedded cost of service method actually undercut their position and bolster using the DSM avoided costs. Mr. Larkin claims "basing the bill credit on embedded energy related costs . . . allows for transparent and repeatable methodology that can be easily updated over time."²² Unlike cost of service--that requires a complex computer model, input data, and piecemeal updates spread across several different commission orders issued years apart, all of which can only be obtained through production request in formal dockets--the DSM avoided costs are published in the IRP. The DSM explanation covers about a page of text and three charts.²³ Understanding cost of service typically requires specific, technical training and years of experience. ICL's experience is that a typical Idahoan can understand the DSM avoided costs in a couple hours. DSM avoided costs are updated every two years, whereas cost of service is updated whenever a utility chooses to file a rate case, something Idaho Power has not done for several years, and even then is often subject to black box settlements that do not choose a single methodology. There is no agreement among stakeholders on a single cost of service method, the entire issue is not transparent, and neither the method nor the inputs are regularly updated. The DSM avoided cost method is agreed to, transparent, updated on a set schedule every two years, publicly available, and as easily, if not more repeatable, than cost of service.

Mr. Larkin claims using the cost of service methodology "will ensure that participating customers are able to offset the energy related portion of base rates, while still contributing to the

²¹ Pengilly at 9, ln. 15-20.

²² Larkin at 13, ln. 19 – 22.

²³ Idaho Power 2015 IRP Appendix C at 72 – 76.

fixed costs . . . as well as other non-variable costs.”²⁴ ICL submits a simpler way to ensure subscribers contribute to fixed costs in the same manner as non-participants is to not allow solar credits to offset the current customer charge and other fixed components of the residential energy bill. Idaho Power makes no showing that Community Solar subscribers incur any more or less fixed costs than non-subscribers. Therefore instead of using an opaque, complex, and novel value method, ICL recommends using a transparent method, DSM avoided costs, and like energy efficiency, simply ensuring Community Solar subscribers pay the same fixed bill components as non-subscribers.

Mr. Larkin claims the cost of service methodology “is consistent with the objective of limiting adverse rate impacts to non-participating customers.”²⁵ While ICL agrees with this objective, without further explanation, this justification for cost of service method does not make sense. If the concern is whether subscribers will cover the cost of the project, then the subscription amount and methods to ensure full subscription are what protects non-participants. If the concern is whether the solar credit will pay subscribers “too much” and thus shift costs to non-participants, the DSM avoided costs already account for this. Again, the DSM avoided costs reflect the value to all customers of a single customer reducing demand on the overall system. As long as the solar credit reflects this value, then non-participants are indifferent.

Finally, Mr. Larkin claims the cost of service method “will be reflective of the seasonal differences in the cost of energy.”²⁶ The cost of service method proposed by Idaho Power may show some seasonal difference by using a single solar credit applied to a seasonally changing solar output.²⁷ However, in reality this proposal just shows that solar output changes through the seasons, something anyone who watches the weather can understand intuitively. By contrast, the DSM avoided costs includes five different categories based on season and time of day²⁸ that, depending on the solar credit design, could send a more accurate price signal to participants by incorporating both changing solar output and changing energy values. ICL looks forward to discussing whether to use a single solar credit or a seasonal credit, as either approach has its merits.

In sum, applying a cost of service methodology to value a generation resource is unprecedented in Idaho, appears to ignore the concept of economic dispatch, and excludes many

²⁴ Larkin at p. 13, ln. 22 – p. 14, ln. 3.

²⁵ Larkin at p. 14, ln. 3- 5.

²⁶ Larkin at p. 14, ln. 18 – 21.

²⁷ Larkin at p. 14 ln. 11 – p. 15 ln. 5.

²⁸ Idaho Power 2015 IRP Appendix C at 72 – 76.

categories of potential costs and benefits to all customers. The cost of service method is highly opaque, rarely updated, is not necessary to ensure participants contribute to fixed costs or insulate non-participants, and barely illuminates seasonal cost differences. By contrast, the DSM avoided costs are the current, existing method to determine the value to all customers of an individual reducing demands on the overall system, are updated every two years and published in the IRP, ensures non-participants are indifferent, and more accurately reflects daily and seasonal differences in the cost of energy. For all these reasons, ICL cannot support this pilot if the cost of service method is used to value the solar energy credits--not because we don't like the result; rather because the method is not accurate or justified.

2. ICL's proposed method to value solar energy credits

For all the reasons above, ICL recommends applying the DSM Alternate Costs as the basis to determine the Solar Energy Credit using the following method. First, we agree to the method Mr. Angell applied to determine the output of the entire pilot project.²⁹ Using that method to determine the hours in which the solar project will produce energy, we overlaid the expected output of the project against DSM alternate cost table, published in the 2015 IRP, to determine the solar energy credit. This results in values for the solar energy credit ranging from \$42.79 per MWH in 2017 to \$78.35 in 2034, as detailed in the chart below.³⁰

| Year | Wtd Avg Price per MWH |
|------|-----------------------|
| 2017 | \$42.79 |
| 2018 | \$43.35 |
| 2019 | \$44.08 |
| 2020 | \$43.85 |
| 2021 | \$47.18 |
| 2022 | \$49.08 |
| 2023 | \$51.08 |
| 2024 | \$53.04 |
| 2025 | \$52.72 |
| 2026 | \$54.35 |
| 2027 | \$55.65 |

²⁹ Angell at p.9, ln. 20 – p.11 ln. 21. (We assert that, as a resource highly likely to be coincident with peak system demands, using average line losses instead of marginal line losses undervalues one of the benefits of local generation by a factor of at least two. In practice, this means the solar subscribers benefit non-subscribers by reducing the marginal losses on the bulk transmission system. However, in the spirit of compromise we accept using the average loss factor for this pilot project.)

³⁰ ICL provided all parties with an electronic copy of the excel workbook used to generate these results along with these Comments.

| | |
|------|---------|
| 2028 | \$57.82 |
| 2029 | \$60.55 |
| 2030 | \$64.50 |
| 2031 | \$66.42 |
| 2032 | \$68.96 |
| 2033 | \$73.10 |
| 2034 | \$78.35 |

These numbers are preliminary estimates intended to explain ICL’s position, so we offer the following notes to further explain and expand our recommendation:

- We present these annual values instead of a levelized cost because this is a more transparent. ICL would agree to either a levelized or non-levelized solar credit as the arguments for either approach are both compelling.
- We propose a methodology and expect to refine the precise solar credit value after further collaboration with the parties. The final calculation may be slightly lower because, due to internal costs and resource constraints, we did not factor in holiday pricing.
- We propose providing all subscribers the same Solar Energy Credit because the value to all customers of a subscriber reducing demand on the overall system is the same regardless of the customer class of the subscriber.
- We propose fixing the Solar Energy Credit rate for the term of this pilot project, as opposed to updating the solar credit in the future as DSM avoided costs change. This will simplify the billing, marketing, and administration of this pilot project.
- We propose the same method to calculate the credit for each bill as proposed by Mr. Larkin, except that the rate specified in tariff Schedule 63 is based on the DSM Alternate Costs instead of the embedded cost of service.³¹ Although, as noted above, ICL is open to applying a single or a seasonal credit.
- We endorse allowing the credit to offset any PCA rate on the same justification as Idaho Power--the solar facility has no variable fuel costs, therefore subscribers should be able to

³¹ See Larkin at p. 15, ln. 8 – 11.

offset year-over-year variable fuel costs tracked through the PCA.³² We endorse not allowing subscribers to offset the fixed components of monthly bills with credits.

- We accept the limit of subscriptions up to 100% of participants annual energy use.³³ And we agree that customers can carry forward credits not applied in prior months.³⁴
- We note that this solar credit is substantially less than the residential retail energy rate and thereby addresses some of Idaho Power's concerns about ensuring subscribers do not avoid paying their share of system costs and having a negligible impact on non-subscribers.³⁵

C. The Timeline For Building The Project

Assuming the changes recommended above, ICL looks forward to soliciting subscriptions and getting the pilot project underway expeditiously. However, we balance this desire with the reality that a poorly designed pilot will severely limit subscribers. Therefore, we propose a less aggressive timeline for soliciting subscriptions and deciding to implement the pilot than Idaho Power has proposed. The key time limit is to build the pilot project in time to capture the 30% federal investment tax credit. With the recent extension by Congress, we have until the end of 2019 to begin construction. ICL encourages all parties to recognize we have plenty of time to further refine the pilot project to maximize the potential success of the program.

Idaho Power proposed both a threshold for the minimum amount of subscriptions required before deciding to build the project, as well as a timeline to reach this threshold. ICL agrees that a minimum threshold for subscriptions is an appropriate criterion to ensure that subscribers cover the pilot costs. However, Idaho Power's proposed threshold is unclear. Mr. Pengilly states "Idaho Power reserves the right to discontinue efforts on the program if the project is not fully subscribed within 120 days after commencement of the enrollment period."³⁶ But then Mr. Pengilly states the Company may elect to continue to solicit subscribers regardless of the 120-day window, but maybe only if they reach 80% within the window.³⁷ One easy way to clarify this

³² See Larkin at p. 15, ln. 17 – p.16, ln. 3.

³³ Pengilly at p.9, ln. 15 – 25.

³⁴ Pengilly at p. 13, ln. 19 – p. 14, ln. 3.

³⁵ This statement does not mean ICL accepts Idaho Power's assertions about cost shifting that may stem from rate design, rather in the spirit of collaboration, we recognize that this issue remains unresolved.

³⁶ Pengilly at p. 12, ln. 5 – 8.

³⁷ Id at p. 12, ln. 8 – 13.

position, and remove the marketing barrier, is to eliminate the completely arbitrary 120-day window to collect subscribers, while maintaining an appropriate threshold. Further, eliminating this 120-day window would alleviate Idaho Power's stated concern of marketing the program during the holiday season.³⁸ However, ICL recognizes that a deadline for acquiring subscriptions will provide focus to the marketing efforts. Accordingly, ICL recommends setting a threshold that once fully subscribed the project will be built and looks forward to discussing with stakeholders a timeline that will maximize the likelihood of full subscription.

Conclusion

ICL appreciates the several years of conversations that have lead to this proposal by Idaho Power. We wholeheartedly support several features of the proposal--specifically the 15% cost share by shareholders, the overall low cost of the project, and inviting all customer classes to participate. However, to surmount the barriers to direct solar ownership Idaho Power identified and maximize the potential to reach full subscription ICL urges the Commission to adopt our recommendations. Assuming the parties can devise a monthly payment option for a long-term commitment, can agree to accurately value the solar energy credits, and can collaborate on a comprehensive plan to solicit subscriptions, ICL stands ready and able to champion this Community Solar Pilot project.

Respectfully submitted this 31st day of August 2016,



Benjamin J. Otto
Idaho Conservation League

³⁸ Id. at p. 12, ln. 21 – ln. 24.

CERTIFICATE OF SERVICE

I,  certify that on this 31st day of August, 2016, I delivered true and correct copies of the foregoing COMMENTS to the following:

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