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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR)
AUTHORITY TO ESTABLISH NEW) CASE NO. IPC-E-17-13
SCHEDULES FOR RESIDENTIAL AND)
SMALL GENERAL SERVICE CUSTOMERS)
WITH ON-SITE GENERATION.)

IDAHO POWER COMPANY
SURREBUTTAL TESTIMONY
OF
CONNIE G. ASCHENBRENNER

1 Q. Please state your name.

2 A. My name is Connie G. Aschenbrenner.

3 Q. Are you the same Connie G. Aschenbrenner that
4 previously presented direct and rebuttal testimony?

5 A. Yes.

6 Q. What is the purpose of your surrebuttal
7 testimony?

8 A. My surrebuttal testimony is intended to
9 provide the Idaho Public Utilities Commission
10 ("Commission") with a final update on customer
11 participation in the Idaho Power Company's ("Idaho Power"
12 or "Company") net metering service and to provide
13 additional information to the Commission and parties in
14 response to certain statements made by parties in rebuttal
15 testimony. My testimony is comprised of two sections.

16 In Section I, I provide the Commission with an
17 update on customer participation in net metering service as
18 of January 31, 2018.

19 In Section II, I respond to statements made by
20 parties related to rate design considerations regarding
21 customers' ability to access energy consumption data and
22 the capabilities of the Company's billing system.

23 In Section III, I clarify the scope of the Company's
24 proposed modifications to Schedule 72.

25

1 **I. UPDATE ON NET METERING PARTICIPATION**

2 Q. Please provide an update on participation in
3 the Company's net metering service.

4 A. The Company has continued to experience rapid
5 growth in its net metering service since I last reported
6 participation as of December 31, 2017. The Company
7 received 95 applications during January 2018, making the
8 total number of active and pending systems 2,089 in Idaho
9 through January 31, 2018.

10 Tables 1 and 2 represent updated Idaho system counts
11 and nameplate capacity.

12 **Table 1 - Idaho Net Metering Customers**

Class	Photovoltaic	Wind	Hydro/Other	Total
Residential	1,874	42	6	1,922
Commercial & Industrial	145	5	4	154
Irrigation	12	1		13
Total	2,031	48	10	2,089

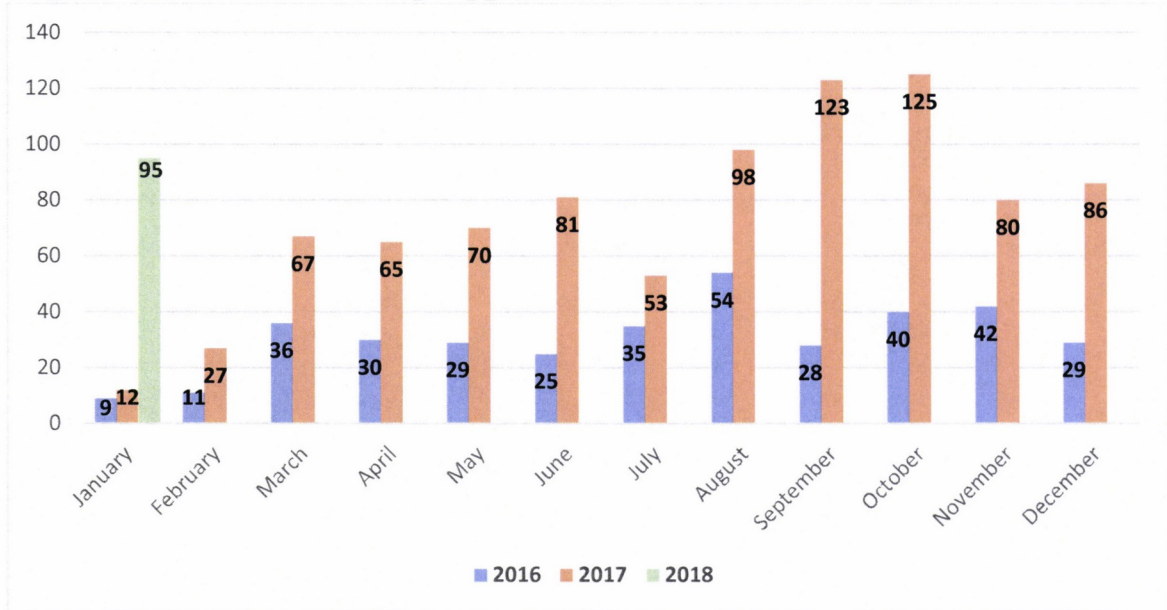
13
14 **Table 2 - Idaho Net Metering Nameplate Capacity (in MW)**

Class	Photovoltaic	Wind	Hydro/Other	Total
Residential	12.896	0.189	0.061	13.146
Commercial & Industrial	2.731	0.030	0.085	2.846
Irrigation	0.916	0.040	0.000	0.956
Total	16.543	0.258	0.146	16.948

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1 The trend in number of submitted applications
2 demonstrates continued interest in net metering. The
3 number of applications submitted by month from 2016 to 2018
4 are shown in Figure 1.

5 **Figure 1. Net Metering Applications Submitted by Month**

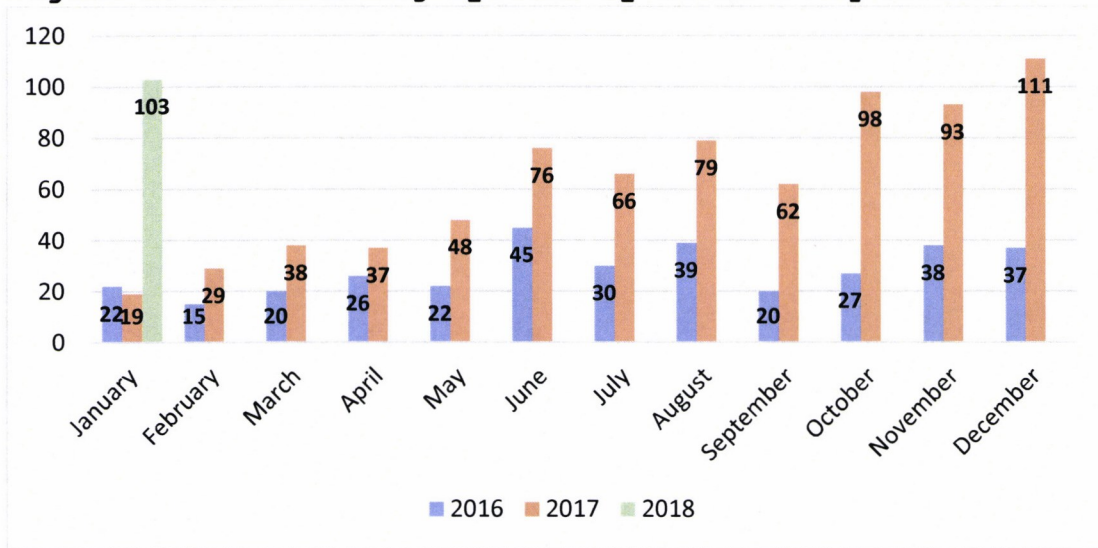


6
7
8 Q. Do you believe the "pending" applications
9 should be included in the reported system counts and
10 capacity?

11 A. Yes. In Idaho Power's experience, once an
12 application for a net metering system is submitted, that
13 system will generally come online within approximately five
14 months. Figure 2 shows, by month, the number of net
15 metering systems that have been energized between 2016 and
16 2018. The trend follows the trend reported in Figure 1;
17 however, it generally lags by a few months.

18

1 **Figure 2. Net Metering Systems by Month of Operation**



2

3 Q. What has been the rate of growth in net
4 metering system counts and nameplate capacity since the
5 Company filed its 2017 Net Metering Report?

6 A. In the 2017 Net Metering Report, the Company
7 reported that as of March 31, 2017, there were 1,277 active
8 and pending net metering systems in Idaho. As of January
9 31, 2018, there are 2,089 active and pending systems in
10 Idaho. This represents a 64 percent increase in net
11 metering systems over a ten-month period.

12 As of March 31, 2017, the total nameplate capacity
13 of active and pending systems was 9.58 megawatts ("MW") in
14 Idaho. The total nameplate capacity of active and pending
15 systems in Idaho was 16.95 MW as of January 31, 2018. This
16 represents a 77 percent increase in nameplate capacity over
17 a ten-month period.

1 **II. INTERVAL DATA & BILLING SYSTEM CAPABILITIES**

2 Q. In his rebuttal testimony, witness Beach
3 suggests, "hourly data are not currently recorded or
4 provided to customers" and that "the meters are programmed
5 to record only monthly net usage."¹ Mr. Beach goes on to
6 say: "The utility admits that it would have to re-program
7 its meters and revise its billing system in order to make
8 such data available."² Are the assertions made by Mr. Beach
9 accurate?

10 A. No.

11 Q. Why not?

12 A. In addition to providing daily register reads,
13 Idaho Power's Automated Metering Infrastructure ("AMI")
14 meters record hourly kilowatt-hour readings (sometimes
15 referred to as hourly interval data) and a 15-minute
16 maximum demand for the bill month. Because AMI meters are
17 installed on approximately 99 percent of residential and
18 small service ("R&SGS") customer accounts, the Company
19 currently collects hourly interval data for 99 percent of
20 its R&SGS customers -- those with on-site generation and
21 those without on-site generation.

22 Q. Do customers have access to their hourly
23 interval data?

¹ Beach Rebuttal, p. 4, ll. 19-21.

² Beach Rebuttal, p. 4, ll. 21-23.

1 A. Yes. All customers with an AMI meter have
2 access to their hourly interval data on Idaho Power's
3 website via My Account, an online resource. Customers must
4 sign up for My Account to view and manage their energy
5 consumption.

6 Q. How much historical data is available to
7 customers through My Account?

8 A. Customers currently have access to hourly
9 interval data for the most recent 60 to 90 days.

10 Q. If a customer requests access to historical
11 hourly interval data beyond the 60 to 90 days, is the
12 Company able to accommodate that request?

13 A. Yes. In fact, the Company already does this
14 upon customer request.

15 Q. If the Commission implemented Staff's proposal
16 for net hourly billing, would the Company be able to
17 provide all R&SGS customers with historical hourly interval
18 data?

19 A. Yes. The Company would be able to provide
20 more data than is currently available on its website;
21 however, this would require some modification to the
22 Company's My Account application and would require time to
23 make these modifications. Once those modifications have
24 been completed, this data could be made available to
25 customers who currently have, or who are considering an

1 investment in on-site generation, so long as an AMI meter
2 is installed at the service location.

3 Q. Would the Company be able to implement net
4 hourly billing for customers who do not have an AMI meter?

5 A. Yes; however, the Company would have to
6 replace any existing non-AMI meters with meters capable of
7 providing hourly interval data. In those instances,
8 historical hourly interval data would not be available for
9 the approximately 1 percent of customers who do not
10 currently have AMI meters.

11 Q. Is the Company's billing system capable of
12 billing net metering customers on a net hourly basis?

13 A. Not as it is currently configured; however, if
14 the billing structure for net metering customers required
15 that net metering customers be billed on a net hourly
16 basis, the Company estimates it would need approximately
17 one year to modify its metering and billing systems in
18 order to bill net metering customers on a net hourly basis.

19 Q. Is the Company's billing system capable of
20 billing net metering customers on time-of-use ("TOU")
21 rates?

22 A. Not as it is currently configured; however, if
23 the billing structure for net metering customers required
24 that net metering customers be billed on TOU rates, the
25 Company estimates it would need approximately ten months to

1 modify its systems in order to bill net metering customers
2 on TOU rates.

3 Q. What systems would need to be modified to
4 implement net hourly billing or TOU rates for net metering
5 customers?

6 A. As stated above, the existing meters are
7 recording the information required to implement net hourly
8 billing or TOU; however, the meter data collection, meter
9 data validation, customer billing system, and the
10 integration between those systems would need to be modified
11 to implement either net hourly billing or TOU rates for net
12 metering customers.

13 **III. MODIFICATIONS TO SCHEDULE 72 ARE MINOR**

14 Q. Did any of the parties who filed rebuttal
15 testimony agree with Commission Staff's suggestions that
16 the Company's proposed modification to Schedule 72 "are not
17 minor, and constitute a major revision to Schedule 72"³ and
18 "the proposed modification to Schedule 72 includes a large
19 number of revisions that were not described in the
20 Company's Application or testimony"?⁴

21 A. Yes. In his rebuttal testimony, Idaho Clean
22 Energy Association witness King notes his appreciation for

³ Dr. Morrison DI, p. 21, ll. 16-17.

⁴ Dr. Morrison DI, p. 23, ll. 6-8.

1 Commission Staff's recognition that "the changes to
2 Schedule 72 are more significant than represented by Idaho
3 Power in its application" and are "outside the scope of
4 this docket."⁵

5 Q. Would you please clarify what modifications
6 the Company has proposed to Schedule 72?

7 A. The modifications proposed by the Company are
8 to (1) add reference to the newly proposed Schedules 6 and
9 8, referred to as "Small On-site Generation," and (2) add
10 the words "barring conditions beyond the Company's control"
11 to the inspection process to allow the Company additional
12 time to complete the on-site inspection of a newly
13 installed on-site generation system when circumstances
14 beyond the Company's control arise.

15 Q. How do you respond to Dr. Morrison's
16 suggestion that there are "a large number of revisions that
17 were not described in the Company's Application or
18 testimony?"⁶

19 A. I disagree with Dr. Morrison's
20 characterization. The changes to Schedule 72 are in fact
21 very minor. I can see that at a glance, it may appear that
22 there are additional and substantial revisions; however,
23 most of the revisions shown in "mark-up" form are due to

⁵ King Rebuttal, p. 8, ll. 8-10.

⁶ Dr. Morrison DI, p. 23, ll. 7-8

1 formatting changes. These formatting changes result when
2 the page break occurs in a different location and causes
3 the text to be moved from one page to the next.

4 Q. Do you believe that the proposed changes to
5 Schedule 72 are outside the scope of this docket?

6 A. No. Adding reference to the newly proposed
7 Schedules 6 and 8 is in fact very much necessary and
8 relevant to this case if the proposed new schedules are
9 approved. The proposed changes accommodate the addition of
10 Schedules 6 and 8 where previously only Schedule 84 was
11 referenced.

12 The other revision, to allow the Company additional
13 time to complete the on-site inspection of a newly
14 installed on-site generation system when circumstances
15 beyond the Company's control arise, is very minor. The
16 need for this flexibility became evident during the 2016-
17 2017 winter which brought heavy snows and icy conditions
18 throughout the Company's service area.

19 Q. Did the Company share with installers and
20 Commission Staff that the Company was considering a
21 modification to Schedule 72 that would allow the Company
22 additional time to complete the on-site inspection of a
23 newly installed on-site generation system when
24 circumstances beyond the Company's control arise?

25 A. Yes.

1 Q. Did anyone express concern with this
2 modification?

3 A. No.

4 Q. Are any of the proposed changes to Schedule 72
5 related to the Company's request for the Commission to
6 acknowledge that smart inverters provide functionality that
7 is necessary to support the ongoing stability and
8 reliability of the distribution system smart inverter
9 request?

10 A. No. In this case, the Company requested that
11 the Commission order the Company to submit a compliance
12 filing in the form of a tariff advice within 60 days of the
13 adoption of the revised Institute of Electrical and
14 Electronic Engineers standards, or 60 days of the
15 conclusion of this case (whichever occurs later) if it
16 agrees that smart inverters provide functionality that is
17 necessary to support the ongoing stability and reliability
18 of the distribution system.

19 **IV. CONCLUSION**

20 Q. Please summarize your surrebuttal testimony.

21 A. The continued pace at which R&SGS customers
22 are installing on-site generation underscores the
23 importance of addressing the Company's net metering service
24 now.

25

1 Idaho Power's AMI meters currently collect both
2 hourly interval data and daily register reads for 99
3 percent of its R&SGS customers. Further, customers
4 currently have access to this hourly interval data on Idaho
5 Power's website via the My Account application.

6 While the Company's billing system is not currently
7 configured to bill R&SGS net metering customers on a TOU or
8 net hourly basis, TOU or net hourly billing for R&SGS
9 customers with on-site generation can be accomplished in
10 approximately one year.

11 The proposed changes to Schedule 72 are relevant to
12 this case, and while the modifications may appear to be
13 substantial, they are in fact very minor.

14 Q. Does this conclude your testimony?

15 A. Yes, it does.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23rd day of February 2018 I served a true and correct copy of SURREBUTTAL TESTIMONY OF CONNIE G. ASCHENBRENNER upon the following named parties by the method indicated below, and addressed to the following:

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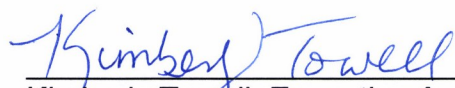
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