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ORIGINAL

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO ESTABLISH NEW
SCHEDULES FOR RESIDENTIAL AND
SMALL GENERAL SERVICE
CUSTOMERS WITH ON-SITE
GENERATION

Case No. IPC-E-17-13

AURIC SOLAR, LLC'S NOTICE OF
CORRECTION

Auric Solar, LLC ("Auric Solar") files this Notice of Correction to its Joinder and Memorandum in Support of Idaho Clean Energy Association's Motion to Dismiss ("Joinder") (filed October 27, 2017).

The Joinder cites Idaho Power Company's Response to the First Production Request of the Commission Staff and states that these responses were attached. Joinder at 4. However, Auric Solar erroneously attached as Exhibit 1 Idaho Power Company's Response to Vote Solar's First Set of Data Requests.

The corrected Exhibit 1, Idaho Power Company's Response to the First Production Request of the Commission Staff, is attached hereto.

Dated: October 27, 2017.

GIVENS PURSLEY LLP

A handwritten signature in cursive script, appearing to read "P. N. Carter".

Preston N. Carter
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Attorneys for Auric Solar, LLC

CERTIFICATE OF SERVICE

I certify that on October 27, 2017, a true and correct copy of Auric Solar, LLC's Notice of Correction was served upon all parties of record in this proceeding via the manner indicated below:

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW, Idaho Power Company ("Idaho Power" or "Company"), and in response to the First Production Request of the Commission Staff to Idaho Power dated September 20, 2017, herewith submits the following information:

REQUEST NO. 1: In its Application, the Company requests that the Commission order the Company to amend its applicable tariff schedules to require the installation and operation of smart inverters for all new customer-owned generator interconnections within 60 days following the adoption of an industry standard definition of smart inverters as defined by the Institute of Electrical and Electronic Engineers.

a. Does the Company intend to require that all newly installed inverters conform with all IEEE smart inverter requirements? Please explain.

b. Please provide copies of the proposed standard definition and all applicable IEEE smart meter requirements.

c. Is it the Company's intent that all IEEE smart meter requirements apply to new installations? If not, please specify or list the requirements that the Company would require of new installations.

RESPONSE TO REQUEST NO. 1:

a. Yes, the Company intends to require that all newly installed inverters conform with all IEEE-1547 and 1547.1 grid support capabilities and functions, also known as smart inverter functionality. As explained in Mr. David M. Angell's testimony, the grid support functions will help to mitigate circuit voltage deviation. To facilitate inverter installation inspection, the Company inspectors will need an inverter certification that they can identify. Thus, an IEEE 1547.1 compliant inverter will inherently have all IEEE 1547 grid support functions which will provide grid support like the ability to mitigate voltage deviation.

b. Although Idaho Power continues to discuss this request with IEEE, IEEE has not yet authorized the Idaho Power employee participating on the drafting team to release this commercially valuable information to other persons or entities.

c. Yes, the Company intends that all IEEE-1547 and 1547.1 grid support capabilities and functions be applied to all new installations.

The response to this Request is sponsored by David M. Angell, Transmission and Distribution Planning Manager, Idaho Power Company.

REQUEST NO. 2: On page 8 of his testimony, Mr. Angell describes the differences between on-grid and off-grid inverters. Mr. Angell's testimony does not discuss grid-interactive inverters, which can function either as on-grid or as off-grid inverters. On page 12 of her testimony, Ms. Aschenbrenner states that the Company had 1,468 net metering systems in its Idaho service territory as of June 30, 2017. How many of these systems are equipped, respectively, with on-grid, off-grid, and grid-interactive inverters?

RESPONSE TO REQUEST NO. 2: All Idaho Power net metered installations use either on-grid or grid-interactive inverters. Idaho Power has not conducted an analysis of which inverters are on-grid or grid-interactive.

The response to this Request is sponsored by David Angell, Transmission and Distribution Planning Manager, Idaho Power Company.

REQUEST NO. 3: On page 9 of its Application, the Company states that "Establishing separate customer classes now will position the Company to study this segment of customers, providing the data necessary to understand how this customer segment utilizes this system." What information will the Company be able to gather that is not currently available for these customers?

RESPONSE TO REQUEST NO. 3: To provide context, the full quote from page 19 of Mr. Timothy E. Tatum's testimony stated that:

The establishment of similarly situated customers or customer classes has been a long-standing and important first step in the ratemaking process. Taking this important first ratemaking step now will position the Company to study this segment of customers, providing the data necessary to understand how this customer segment utilizes the Company's system. The data quantifying the usage of the system will inform what costs (revenue requirement) are appropriately allocated to the newly established customer classes in a future rate proceeding (class cost-of-service process).

Tatum DI, p. 19, lines 14-24.

The Company is currently able to gather the information that is necessary to study various segments of customers; however, should the Commission decline to authorize the establishment of the requested new customer classes, the Company would have no reason to modify its class cost-of-service study or ratemaking processes. If the Idaho Public Utilities Commission ("Commission") determines there are differences that warrant the establishment of new customer classes, the Company will assign costs to the new customer classes in the class cost-of-service study and design rates specific to those classes as part of a future rate proceeding. If the Commission determines no differences exist that warrant the creation of a new customer class for

customers with on-site generation, the Company will continue to allocate costs to the residential and small general service customer classes that exist today.

The response to this Request is sponsored by Tim Tatum, Vice President of Regulatory Affairs, Idaho Power Company.

REQUEST NO. 4: On pages 9 and 10 of its Application, the Company states that "The data quantifying the usage of the system will inform what costs and benefits (revenue requirement) are appropriately allocated to the newly established customer classes in a future rate making process (class cost-of-service process)". Given that the Company's proposed Schedules 6 and 8 would initially have zero customers, how many years will be required before there are sufficient customers in these new classes to develop accurate cost-of-service allocators?

RESPONSE TO REQUEST NO. 4: The Company cannot determine how many years will be required before there are sufficient customers in Schedules 6 and 8 to perform a stand-alone cost-of-service study. However, all customers with on-site generation will be used to develop cost-of-service allocators for the new customer classes, those who remain on Schedule 84 and those taking service under Schedules 6 and 8. The Company has proposed that existing residential and small general service net metering customers remain on Schedule 84 for a period of time, where the term of the transition period be determined by the Commission as part of a future rate proceeding; however, they will transition to Schedules 6 and 8 at the end of the transition period. Their usage characteristics accurately represent the segment of customers with on-site generation, regardless of which tariff schedule they take service under during the transition period.

The response to this Request is sponsored by Tim Tatum, Vice President of Regulatory Affairs, Idaho Power Company.

REQUEST NO. 5: The Company's proposed tariffs would apply to generation facilities fueled by solar, wind, biomass, geothermal, hydropower, and fuel cell technology. In Exhibit 9 of its Application (Charts 3, 4, and 5), the Company discusses the unique patterns of energy use by net metered solar facilities. Please provide similar charts for net metering customers who generate energy using wind, biomass, geothermal, hydropower, and fuel cell technology.

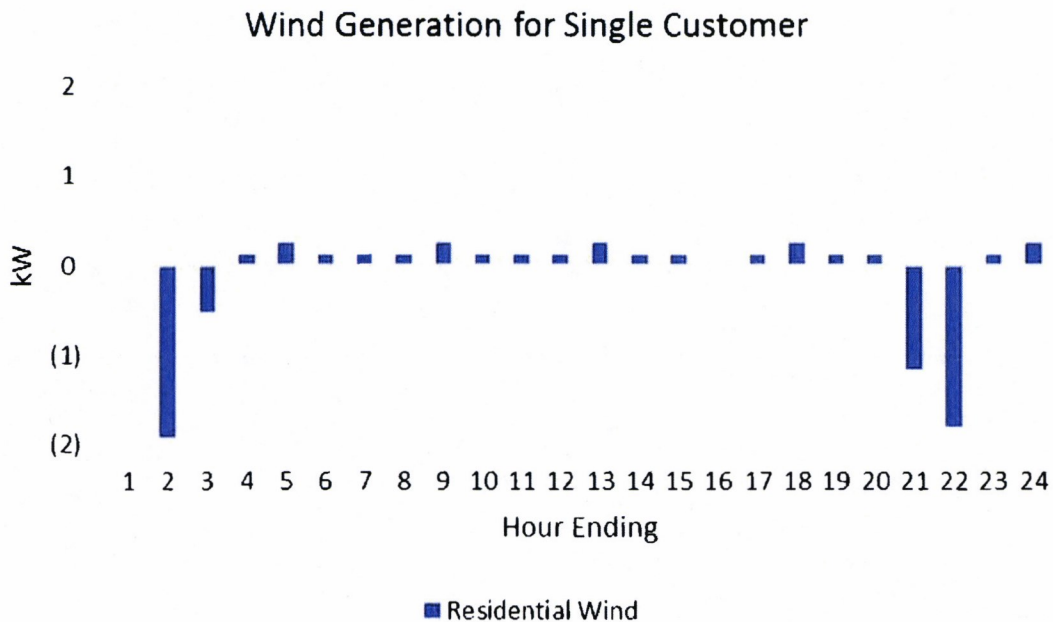
RESPONSE TO REQUEST NO. 5: Chart 3 in Exhibit 9 of Ms. Connie G. Aschenbrenner's testimony compares the average load profile calculated from the Company's residential standard service customer class to the average load profile calculated from the Company's entire residential net metering customer segment on the day of the 2016 adjusted peak. That load profile for the residential net metering customer segment included all generation types allowed under Schedule 84 and was not limited to net metered solar facilities.

The discussion accompanying Charts 4 and 5 on pages 10-11 of Exhibit 9, as well as on pages 11-14 of Mr. Angell's testimony, was not intended to illustrate the load profile of a customer with solar generation but rather it was intended to illustrate that a net zero customer utilizes all aspects of Idaho Power's grid during the hours they are consuming energy and during the hours they are exporting energy to the grid. To illustrate the utilization of the grid by a net zero customer, the Company selected a single residential net metering customer who netted their usage to zero during 2016.

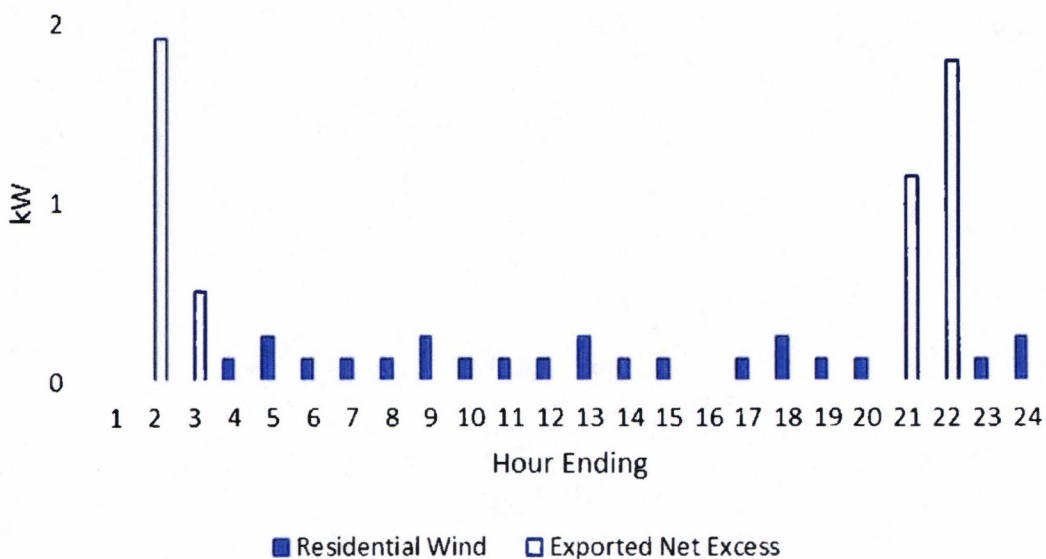
In order to provide similar charts for net zero customers with generation sources other than solar, the Company selected customers who had netted their usage to zero during 2016 using wind and hydropower generation. The hourly usage was not

compared to the usage of a customer whose home was on the same street, as was done in Charts 4 and 5 in Exhibit 9, because the wind and hydropower installations are not on a residence. Thus, the wind and hydropower load profiles are not comparable to the load of a residential standard service customer. Please see the charts included below for the load profile of one customer with wind generation and the load profile for one customer with hydropower generation. As with Charts 4 and 5 in Exhibit 9, there are two graphs for each customer. The first graph is of the net hourly usage on the day of the Company's 2016 adjusted system peak day (June 29) and the second graph, represents the same day but uses the absolute value for any hour where the customer generated excess energy.

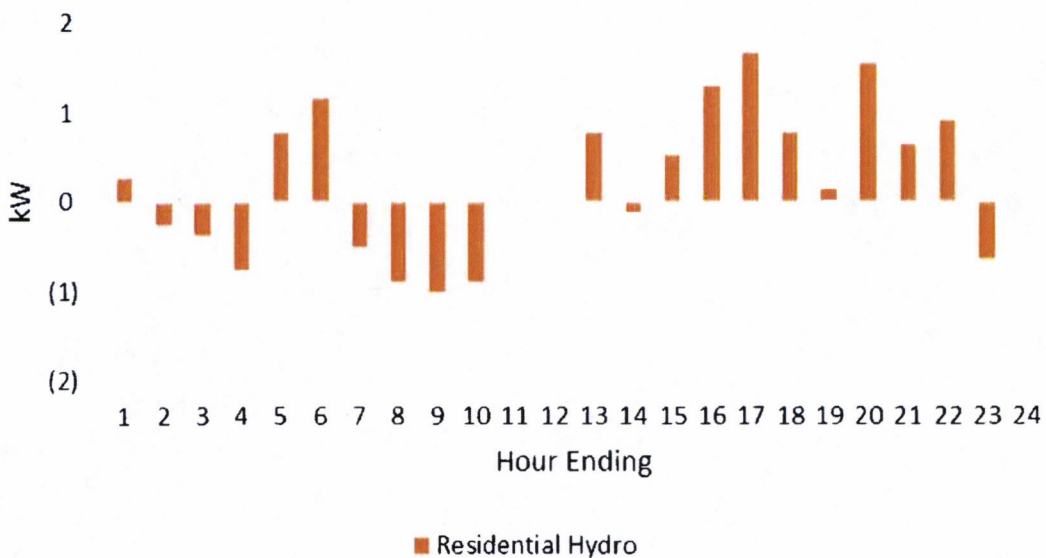
The Company does not have any net metering customers, in any of its customer segments, who generate energy using biomass, geothermal, or fuel cell technology, and therefore, no charts were included for these generation types.



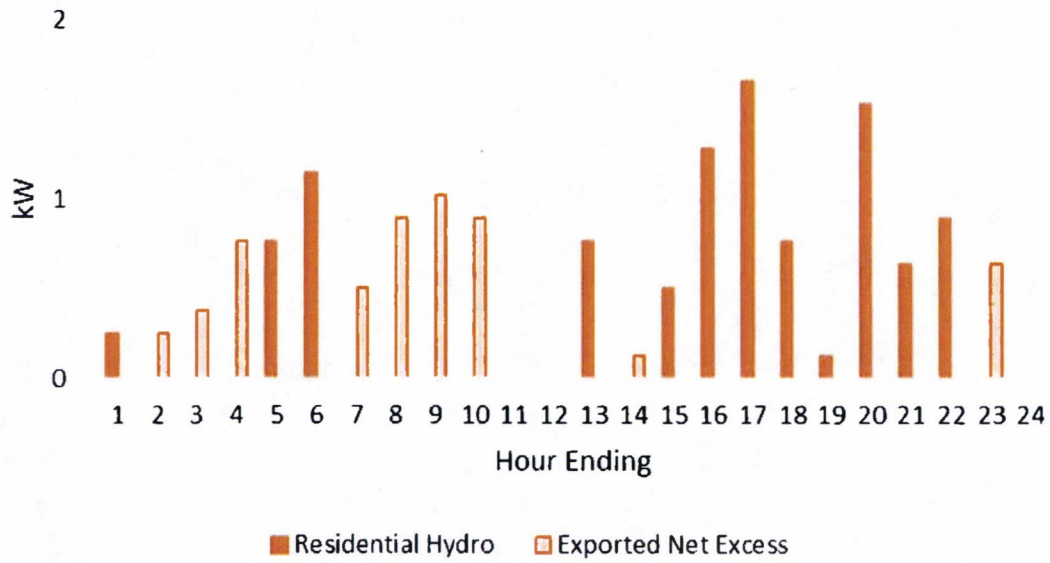
Wind Generation for Single Customer (absolute value)



Hydro Generation for Single Customer



Hydro Generation for Single Customer (absolute value)



The response to this Request is sponsored by David Angell, Transmission and Distribution Planning Manager, Idaho Power Company.

REQUEST NO. 6: The Company's proposed tariffs would apply to generation facilities fueled by solar, wind, biomass, geothermal, hydropower, and fuel cell technology. In Exhibit 9 of its Application, the Company discusses cost shifting that occurs from solar net metered customers to non-net metering customers. Please explain how costs might be shifted to non-net metering customers from net metering customers who generate energy using wind, biomass, geothermal, hydropower, and fuel cell technology.

RESPONSE TO REQUEST NO. 6: The discussion around cost shifting in Exhibit 9 of the Company's Application, and also on pages 13-18 in Mr. Tatum's testimony, references the cost shift from all existing net metering customers to non-net metering customers. Neither the discussion, nor the analysis, was limited to solar net metering customers.

The response to this Request is sponsored by Tim Tatum, Vice President of Regulatory Affairs, Idaho Power Company.

REQUEST NO. 7: On page 4 of its Application, the Company states that it has deployed Advanced Metering Infrastructure (AMI) in its service area enabling the Company to achieve more precise usage measurement and facilitate more sophisticated, cost-based rate designs. Please explain how AMI might be used to achieve more sophisticated, cost-based rate designs for its net metering customers. Does the Company also propose updating rate designs for its non net metering classes?

RESPONSE TO REQUEST NO. 7: Prior to the deployment of Advanced Metering Infrastructure (“AMI”), Idaho Power used mechanical and solid-state meters to measure consumption for residential and small general service customers. These meters measured only the kilowatt-hour (“kWh”) consumption, and the Company retrieved this data monthly according to the meter read date of the customer's billing cycle. Idaho Power's AMI system collects additional data from the AMI meters that enables the Company to better develop cost-based rate designs. The additional data provided by the AMI system is listed below:

- 15-minute max demand – Idaho Power's AMI meters record the 15-minute maximum demand. The 15-minute maximum demand enables the Company to implement demand rates for residential and small general service customers using a 15-minute maximum demand.
- Hourly kWh – Idaho Power's AMI meters record the net hourly energy consumption and/or generation. The hourly energy data enables the Company to implement time-of-use rates for residential and small general service customers with on-site generation.

- Hourly kilowatt ("kW") – The hourly kWh can be used as a 60-minute maximum demand. The 60-minute maximum demand enables the Company to implement demand rates for residential and small general service customers using a 60-minute maximum demand.

One of Idaho Power's objectives regarding rate design is to establish prices that primarily reflect the cost of the services provided. While the Company is not currently proposing pricing changes for net metering or standard service customers as part of its proposal, Idaho Power will continue to evaluate and propose modifications to the rate design of all customer classes in future rate case proceedings.

The response to this Request is sponsored by Tim Tatum, Vice President of Regulatory Affairs, Idaho Power Company.

REQUEST NO. 8: In Exhibit 9, the Company states that, as of December 31, 2016, Idaho Power's net metering service consisted of 1,067 active systems. For each system that was connected to Idaho Power for the entire period between January 1, 2016 through December 31, 2016, please provide the following information:

- a. The schedule under which the net metering customer takes power.
- b. The County in which the customer is located.
- c. Net hourly power consumption/production data for the 2016 calendar year.

RESPONSE TO REQUEST NO. 8: Please see the attached Excel file which includes the hourly net energy consumption for all net metered customers who had an AMI meter and who were taking net metering service for the entire period between January 1, 2016, through December 31, 2016. The Company has provided the schedule under which the net metering customer was taking service and the county in which the customer was located.

It is important to note that the attached data is net hourly energy consumption/production data by customer, not by system. A customer may have multiple systems, possibly with different generation sources, attached to a service point (meter). In that case, each generation source is considered a different system; however, because the energy consumption is metered at a single point, a customer with multiple systems is one customer. Please reference footnote No. 3 in Exhibit 9.

The response to this Request is sponsored by David Angell, Transmission and Distribution Planning Manager, Idaho Power Company.

REQUEST NO. 9: Schedule 84 includes a one meter option for customers who take service under schedules other than 1, 4, 5, and 7, and whose generation facilities have a total nameplate capacity rating of 25 kW or smaller, or whose generation facilities have a total nameplate capacity that is no more than 2% of their BLC. Under the Company's proposal, how would these customers be able to receive net metering service?

RESPONSE TO REQUEST NO. 9: Under the Company's proposal, they will continue to take service under the existing net metering schedule (Schedule 84). The Company is requesting that Schedule 84 be closed to new service for only residential and small general service customers.

The response to this Request is sponsored by Connie Aschenbrenner, Rate Design Manager, Idaho Power Company.

REQUEST NO. 10: Schedule 84 includes a two meter option for customers who take service under schedules other than 1, 4, 5, and 7, and whose generation facilities have a total nameplate capacity rating of 100 kW or smaller. Under the Company's proposal, how would these customers be able to receive net metering service?

RESPONSE TO REQUEST NO. 10: Under the Company's proposal, they will continue to take service under the existing net metering schedule (Schedule 84). The Company is requesting that Schedule 84 be closed to new service for only residential and small general service customers with on-site generation.

The response to this Request is sponsored by Connie Aschenbrenner, Rate Design Manager, Idaho Power Company.

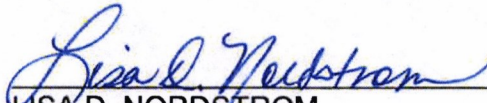
REQUEST NO. 11: Would the Company's proposal apply to customers who use on-site generation to reduce their own power consumption, but who eliminate their ability to export power to the Company's grid by means of a Grid Tie Limiter, Grid Inverter with Export Control, or similar device? If so, please explain how customers receiving power on schedules other than Schedules 6 and 8 might be able to use on-site generation to reduce their power consumption.

RESPONSE TO REQUEST NO. 11: Yes. Customers with on-site generation systems that are connected in parallel with the Idaho Power system will be required to take service under the new schedules. An on-site generation system is connected in parallel if it is connected to and receives voltage from Idaho Power's system. A customer using a Grid Tie Limiter, a Grid Inverter with Export Control, or a similar device is still connected in parallel with the system.

A customer may use on-site generation to reduce their power consumption and take service on schedules other than Schedules 6 and 8 if their system is not connected in parallel to Idaho Power's system. For example, a customer could use a mechanical transfer switch such that they either consume energy from Idaho Power or consume energy from their on-site generation system with no ability to feed power from the on-site generation back onto Idaho Power's system. This system would not be connected in parallel to the electric grid.

The response to this Request is sponsored by David Angell, Transmission and Distribution Planning Manager, Idaho Power Company.

DATED at Boise, Idaho, this 11th day of October 2017.



LISA D. NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 11th day of October 2017 I served a true and correct copy of IDAHO POWER COMPANY'S RESPONSE TO THE FIRST PRODUCTION REQUEST OF THE COMMISSION STAFF upon the following named parties by the method indicated below, and addressed to the following:

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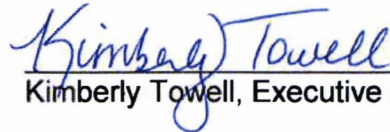
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