



OFFICE OF THE CITY ATTORNEY

MAYOR: David H. Bieter | BOISE CITY ATTORNEY: Robert Luce

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IDAHO PUBLIC
UTILITIES COMMISSION

August 10, 2018

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83702

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

Please find enclosed for filing an original and seven (7) copies of City of Boise's Brief on
Reconsideration.

Please contact me if you have any questions. Thank you.

Sincerely,

Abigail R. Germaine
Deputy City Attorney

ARG/dga
Enc.

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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorney for Intervenor

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

CITY OF BOISE CITY'S BRIEF
IN RESPONSE TO ORDER
GRANTING
RECONSIDERATION

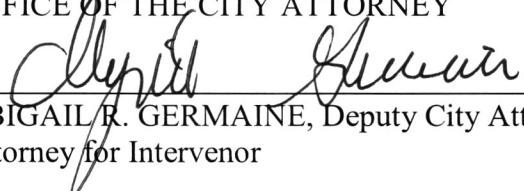
COMES NOW, the city of Boise City, hereinafter referred to as "the City" and pursuant to the Idaho Public Utility Commission's ("Commission") Order No. 34098, filed on June 28, 2018, and Rules of Procedure, Rule 331 and Rule 332 (IDAPA 31.01.01.331 and 31.01.01.332), hereby files this Brief in Response to the Commission's Order 34098 granting reconsideration, and petitions the Commission to issue an order on reconsideration requiring Idaho Power Company ("Idaho Power") to amend its new Schedules 6 and 8 to apply only to customers with on-site generation who actually export electricity to Idaho Power's distribution system.

Specifically, the City supports Vote Solar's arguments in its Petition for Reconsideration stating that Idaho Power failed to present evidence that non-exporting customers with on-site generation are fundamentally different from other customers and should be classified into the new Schedules 6 and 8. Instead, Idaho Power's case focused on customers with on-site generation who both import and export energy to Idaho Power's system as being fundamentally different from other customers. The Commission's Final Order No. 34046 does not specifically address and makes no findings that those customers who are not bi-directional, and merely import energy from Idaho Power's system, are fundamentally different enough to warrant being separated into Idaho Power's new schedules.

WHEREFORE, the City respectfully requests this Commission issue an order on reconsideration reversing its approval of Schedule 6 and 8 as submitted by Idaho Power, and instead require that only customers with on-site generation who export electricity to Idaho Power's system be placed into Schedules 6 and 8.

DATED this 10 day of August 2018.

OFFICE OF THE CITY ATTORNEY


ABIGAIL R. GERMAINE, Deputy City Attorney
Attorney for Intervenor

CERTIFICATE OF SERVICE

I hereby certify that I have on this 10 day of August 2018, served the foregoing documents on all counsel of record as follows:

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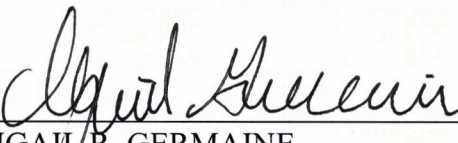
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