

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF IDAHO</b>	)	
<b>POWER COMPANY'S AUTHORITY</b>	)	<b>CASE NO. IPC-E-17-13</b>
<b>TO ESTABLISH NEW SCHEDULES</b>	)	
<b>FOR RESIDENTIAL AND SMALL</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>GENERAL SERVICE CUSTOMERS</b>	)	
<b>WITH ON-SITE GENERATION.</b>	)	<b>PARTIAL JOINDER</b>

The Idaho Conservation League (ICL) hereby joins a portion of the Motions filed by the Idaho Clean Energy Association, Auric Solar, and City of Boise. Specifically, ICL joins in requesting the Alternate Relief to address the fundamental question underlying Idaho Power's Application – the costs and benefits of distributed energy in Idaho. Understanding the costs and benefits attributable to distributed energy is a necessary precondition to making a informed decision about changes to existing rate classifications, designs, and amounts. Despite three attempts since 2013 to engage the Company regarding this fundamental issue, Idaho Power continues to disregard stakeholders' suggestions and instead asks this Commission to approve changes to rate classifications that will only chill economic activity and consumer choice with no corresponding public benefit. Regarding the Motions before you, we urge the Commission to exercise the power vested in you by the Idaho Public Utilities Commission Rules of Procedure to "invite settlement of an entire proceeding." IDAPA 31.01.01.273

## Background

This docket is the third time ICL has engaged Idaho Power regarding distributed energy. In 2013, Idaho Power asked this Commission to segregate distributed energy customers. ICL joined all other parties to oppose this request and offered an alternative method to assess the costs and benefits of distributed energy. *See Direct Testimony of R. Thomas Beach on Behalf of ICL*, IPC-E-12-27. The Commission correctly ruled that considerations of customer classification and rate design must be vetted in a general rate case and after consultation with stakeholders. *Order No. 32846*.

In 2016, Idaho Power hosted a meeting at the Company headquarters to put forward a substantially similar proposal to change classifications and rate designs for distributed energy users. ICL participated in that meeting and followed up our verbal comments with a letter to the Company proposing to use the 2017 Integrated Resource Plan as an appropriate venue to consider the full range of costs and benefits distributed energy may provide. More specifically ICL wrote:

The Integrated Resource Plan is the appropriate venue to develop credible forecasts of potential distributed energy growth; understand the full range of impacts to the grid, energy demands, and capacity needs; and compare distributed energy to other resource options. This basic information is a precursor to making informed policy decisions about distributed energy resources.

*See Exhibit 401.*

As a member of Idaho Power's 2017 Integrated Resource Plan Advisory Council, ICL attests the Company, despite verbal requests to the IRP team from a range of council members, did not meaningfully address distributed energy in the 2017 IRP.

In June of 2017, ICL attended a meeting convened by Idaho Power to inform a limited group of stakeholders about the Company's plans for proposed classification and rate changes for distributed energy. Again, ICL supplemented our verbal comments with

a letter to the Company proposing a process to consider the costs and benefits of distributed energy. Specifically ICL wrote:

ICL believes the key question in this issue is the value of distributed energy on Idaho Power's system. If stakeholders agreed to the value, then the pricing conversation would be easier. But because stakeholders do not know if distributed energy adds or avoids costs, the pricing conversation is difficult at best. ICL encourages Idaho Power to work with stakeholders to determine an accurate value of distributed energy on the system.

This Value of Distributed Energy study should have several key features:

- Use a Technical Advisory Committee consisting of stakeholder appointees and neutral experts
- Review other similar studies to define and agree upon best methodologies
- Rely on publicly available data and transparent processes to build understanding
- Agree to the type and quality of outputs before initiating study

The study then provides the basis for future discussion on the appropriate regulatory model and rate designs. ICL encourages Idaho Power to engage in this fact finding and analysis effort before designing possible customer classifications and rates.

*See Exhibit 402.*

Idaho Power's Application here to create new customer classes is the same request the Company made in 2013, and proposed informally in 2016 and 2017. Repeatedly stakeholders have expressed a desire to understand the costs and benefits of distributed generation on Idaho Power's system as a precursor to considering possible classification and rate changes. ICL has proposed three different processes to achieve this understanding – a valuation based on avoided energy costs in 2013, using the 2017 IRP to analyze the issue, and outlining a collaborative process akin to the successful efforts to address Demand Response and Solar Integration. All of these proposals stem from conversations with other stakeholders and would provide a foundation for an informed, collaborative approach. Instead of working with customers, Idaho Power asks this

Commission to implement a change that only creates economic uncertainty for companies and consumers with no commensurate public benefit.

One form of public benefit would be to address a verified and meaningful cost shift. But Idaho Power's Application and testimony cannot establish this. The premise underlying Idaho Power's alleged cost shift is that each residential or small commercial customer causes the same fixed costs and consumes the same amount of energy as others in the same class; rates are set accordingly. But this premise is demonstrably untrue. For example, residents of Salmon, Idaho are an island separated from Idaho Power's main service territory, yet the premise upon which rates are designed assumes the fixed costs to serve a farm house in Salmon are equal to an apartment in Boise. Anyone who has looked at a map knows this premise is not accurate. Similarly, the assumption that all residential customers consume the same amount of energy each month is demonstrably false; for example whether or not a home has air conditioning is a major determinate of total and peak coincident consumption. Both of these examples teach us that current cost of service and rate design embeds substantial costs shifts. Idaho Power makes no effort to calculate these inaccuracies even though they represent observable and durable differences in individual cost causation. ICL urges the Commission to consider Idaho Power's alleged and controversial cost shift here in light of known and substantial inaccuracies embedded in current rates.

Another public benefit could be the ability to collect necessary information to address an issue. In response to Staff discovery asking what information that creating new customer classes would provide Idaho Power responded: "The Company is currently able to gather the information that is necessary to study various segments of customers

[.]” The response goes on to state, “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.” *See Exhibit 403.*

The Commission should reject this thinly veiled threat. Idaho Power, without specific direction by the Commission, can and does consider changes to class cost-of-service studies or ratemaking processes in every general rate case, and even outside of rate cases. Instead of going far beyond what is necessary to address the question before you, as Idaho Power asks, ICL urges the Commission to exercise the power vested in you by the Idaho Public Utilities Commission Rules of Procedure to “invite settlement of an entire proceeding.” IDAPA 31.01.01.273.

#### **Idaho Power Has Previously Meaningfully Engaged Stakeholders in Complex Issues**

Engaging in a purposefully designed and inclusive procedure is a successful method to understand complex issues and build consensus around solutions. When Idaho Power sought to disband the Demand Response programs, ICL joined others in negotiating a process to fully understand the issue and develop informed solutions. That process began by analyzing the need for Demand Response in the 2013 IRP, established an interim structure that preserved value for stakeholders while limiting risks perceived by the Company, and concluded after informal public workshops created understanding and consensus that was reflected in a Settlement Agreement. *See Order No 32923.* This resolution of the issue has remained durable and effective since 2013.

In docket IPC-E-14-18 Idaho Power sought to implement new integration charges for utility scale solar projects. ICL joined others in negotiating a purposefully designed

and inclusive method to build understanding and consensus. The key features of that agreement were:

- Establishing a timetable that balanced the uncertainty faced by businesses against Idaho Power's perceived risk of collecting inaccurate rates.
- Using a Technical Advisory Committee of experts designated by the Company, the Commission, and stakeholders to develop robust methodologies, analysis, and results.
- Agreeing to a framework for addressing the issue developed by a neutral third party, there the National Renewable Energy Laboratory.
- Identifying the specific elements the Technical Committee would analyze.

*See Order No. 33227.*

As a direct result of this robust and inclusive method, no one mounted a serious challenge to the results of the study. While we suggested improvements to consider, overall ICL joined Renewable Northwest in supporting the integration charges proposed by Idaho Power. *See Order No. 33563.*

In both of these examples, Idaho Power found the ability to meaningfully engage with stakeholders to building understanding and consensus around complex issues. In neither case did the Company require a Commission order injecting uncertainty into the service territory before engaging in the issue. While both processes had unique features, they both ended in the same place – an agreement among stakeholders that has proven durable and effective going forward. ICL proposes to achieve the same result here.

## **An Alternative Approach to Addressing Distributed Energy**

Instead of injecting unwarranted uncertainty for consumers based on incomplete analysis, ICL proposes the following as a more effective procedure to address the costs and benefits of distributed energy - knowledge that is necessary to make any informed decisions about rate classifications, designs, and amounts.<sup>1</sup> ICL's proposal builds upon the Alternative Relief proposed by Idaho Clean Energy Association, Auric Solar, and the City of Boise.

### 1. Establish objective criteria to gauge meaningful impacts

Balancing the uncertainty facing business and consumers with Idaho Power's perceived risk of rate inaccuracies is important. ICL suggests that parties establish objective criteria by which to measure whether alleged negative impacts to the Company are meaningful.

### 2. Convene a public, inclusive forum to consider the technical issues

In the Demand Response docket, stakeholders convened a series of public workshops with a neutral facilitator. This format was essential to building understanding and trust among participants. Other states that have considered distributed energy use a neutral third party expert to guide the analysis of complex issues. For example, the firm Energy+Environmental Economics (E3) developed a public tool<sup>2</sup> to facilitate a robust, transparent analysis of distributed resources for the California PUC and stakeholders.

### 3. Create a robust framework to fully consider the issue

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<sup>1</sup> To be clear, ICL supports *Order No. 32846* instructing Idaho Power to file a general rate case to vet any potential changes to classification or rates.

<sup>2</sup> More information available at: <https://www.ethree.com/tools/acm-avoided-cost-model/>

Because each utility system and state policy is unique, it is not possible to devise a single, industry-wide framework to consider costs and benefits of distributed energy. It is possible to find commonalities and best practices to adopt for Idaho. A meta-analysis of 16 prior evaluations of distributed energy by the Rocky Mountain Institute found these common best practices:<sup>3</sup>

Ensure a transparent process so that stakeholders have confidence in the outcomes.

Examine the issue from a variety of perspectives by using the cost-benefit tests developed for energy efficiency. This analytical framework has proven effective at considering how changes in individual customer behavior impact other stakeholders. These tests were recently updated in the 2017 National Standard Practice Manual, which introduces a new variation the “Resource Value Test.”<sup>4</sup>

Identify a full range of elements that are relevant to consider. The attached graphic from the Rocky Mountain Institute report, *Exhibit 404*, is a useful tool to identify and categorize common elements.

Identify formulas and methodologies to value each of these elements. For some elements, like avoided energy, Idaho has an existing methodology. For others, like deferred distribution costs, Idaho utilities have begun devising methodologies. Some elements have a clear qualitative impact, like local economic development, even if the quantification is uncertain. A robust methodology searches for methods to quantify value, and in the absence, establishes qualitative placeholders while stakeholders develop additional quantitative tools.

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<sup>3</sup> [https://rmi.org/wp-content/uploads/2017/04/eLab\\_DERBenefitCostDeck\\_Report\\_2013-1.pdf](https://rmi.org/wp-content/uploads/2017/04/eLab_DERBenefitCostDeck_Report_2013-1.pdf)

<sup>4</sup> <https://nationalefficiencyscreening.org/national-standard-practice-manual/>

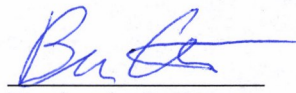
Use a timeframe that aligns with the resource under consideration. A cost of service study is limited to a single test year. A distributed energy system, or any generation system, has a lifespan of decades. A robust method must capture the costs and benefits that accrue over the lifespan of the resource.

Respect state energy policy objectives. The Idaho Energy Plan establishes a state policy to: “Encourage the development of customer-owned and community-owned renewable energy and combined heat and power facilities that meet the Energy Plan Objectives of the State of Idaho.”<sup>5</sup> Those objectives include: providing secure and reliable energy; ensuring access to energy for all Idahoans; protecting public health, safety and the natural environment; and promoting sustainable economic growth, job creation, and rural economic development. A robust framework respects this broad range of objectives when establishing energy policy in Idaho.

## **Conclusion**

After years of arguing over assumptions and allegations, ICL believes it is time to address the fundamental question – the costs and benefits of distributed energy in Idaho. Since 2013, ICL has repeatedly met with stakeholders to develop and propose an inclusive method to address the underlying question. Never the less Idaho Power persists to submit a single solution based on incomplete accounting and faulty reasoning. Instead of wading into the debate, ICL urges the Commission to use your inherent authority to encourage Idaho Power to collaborate with their customers.

Respectfully submitted this 1<sup>st</sup> day of November, 2017

  
Benjamin J. Otto  
Idaho Conservation League

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<sup>5</sup> Page 8, Idaho Energy Plan, 2012. Available at: [https://oemr.idaho.gov/wp-content/uploads/2016/06/2012\\_idaho\\_energy\\_plan\\_final\\_2.pdf](https://oemr.idaho.gov/wp-content/uploads/2016/06/2012_idaho_energy_plan_final_2.pdf)

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<b>WITH ON-SITE GENERATION.</b>	)	<b>PARTIAL JOINDER</b>

**Exhibit 401**

**Idaho Conservation League Letter to Idaho Power Regarding the July 27, 2016 Net  
Metering Workshop and Status Report**



[www.idahoconservation.org](http://www.idahoconservation.org)

## **Idaho Conservation League**

PO Box 844, Boise, ID 83701  
208.345.6933

August 5, 2016

To: Idaho Power Company

From: Benjamin Otto, Idaho Conservation League

Re: Comments regarding the July 27, 2016 Net Metering Workshop and Status Report

Idaho Power,

Thank you for hosting a public workshop to apprise the public of the current status of distributed energy in your service territory and your projections for future growth in this sector. The Idaho Conservation League acknowledges the growth of distributed energy resources presents new challenges to a traditional utility. Along with these challenges come new opportunities as customers invest their own dollars to meet their own energy needs and develop a two-way relationship with utilities. We look forward to being a part of a careful, comprehensive process assessing the full range of challenges and opportunities presented by distributed energy.

ICL believes it is important to put the current scale of distributed energy into context. Idaho Power's 2016 Net Metering Status Report shows 7.08 MW of cumulative distributed energy capacity as of March 31, 2016.<sup>1</sup> This amounts to roughly 0.2% of the all-time system peak.<sup>2</sup> Applying forecasts for 2021 from the Net Metering Report and the 2015 IRP reveals that even with an aggressive forecast of distributed energy growth this ratio could increase to 0.9% by 2021.<sup>3</sup> The potential cost shifting is even less meaningful. The Report alleges a current cost shift within the residential class of \$55,712 from some net meterers onto all non-net meters.<sup>4</sup> This amounts to 0.01% of the expected revenue from the residential class in 2016.<sup>5</sup> Clearly there is plenty of time to study this issue and make careful decisions.

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<sup>1</sup> 2016 Net Metering Status Report at page 2, Table 1.

<sup>2</sup> 7.08 MW of cumulative net metering nameplate capacity divided by the Idaho Power all time system peak of 3,407 MW as reported at:

<https://www.idahopower.com/AboutUs/CompanyInformation/Facts/>

<sup>3</sup> The Net Metering Report, on page 12, estimates 5,930 systems under the high growth forecast, and on page 9 uses an assumed "common" system size of 6 kw resulting in a forecast of 35,580 kw by 2021. The 2015 IRP forecasts peak loads in 2021 to be 3,922 MW at Appendix C, page 13.

<sup>4</sup> Id at 7.

<sup>5</sup> Based on the proposed residential class revenue of \$500,504,200 for 2016 filed by Idaho Power as Exhibit 6 of Mr. Harris's testimony in IPC-E-16-02.

The National Association of Regulatory Utility Commissioners is drafting a Manual on Distributed Energy Resources Compensation.<sup>6</sup> Section six of the draft manual gives a framework to place distributed resource issues into perspective for stakeholders and regulators. At the relatively low level of penetration today, “there is time to plan and take the appropriate steps and avoid unnecessary policy reforms simply to follow suit with actions other jurisdictions have taken.”<sup>7</sup> The manual further suggests that when penetrations reach 5% of peak loads distributed energy maybe significant enough to warrant policy changes.<sup>8</sup> Most relevant to Idaho, the manual suggests that during this time of growth stakeholders and utilities “look closely at data, analysis and studies from its particular service territory before [implementing policy changes] since all electric systems are impacted by DER penetrations differently.”<sup>9</sup>

ICL submits that, because distributed energy is small today although growing, the 2017 Integrated Resource Plan is the most appropriate venue to assess the full range of potential costs and benefits that may develop over time. We appreciate Idaho Power’s acknowledgement in the Net Metering Report that net metering customers are less costly to serve than typical residential customers.<sup>10</sup> However, the cost of service construct used in the Report does not capture the full range of costs and benefits that may arise from increased distributed energy. Idaho Power acknowledged at the Net Metering Workshop, in response to a customer question, that cost of service does not assess resource values or options, rather just the cost to provide electric service. The Integrated Resource Plan is the appropriate venue to develop credible forecasts of potential distributed energy growth; understand the full range of impacts to the grid, energy demands, and capacity needs; and compare distributed energy to other resource options. This basic information is a precursor to making informed policy decisions about distributed energy resources.

We appreciate Idaho Power continuing to monitor the growth of distributed energy in Idaho. We thank you for hosting a well-attended public workshop to begin discussing this important issue. And we look forward to continuing this conversation in the 2017 Integrated Resource Plan.

Sincerely,

Benjamin J. Otto  
Energy Associate  
Idaho Conservation League

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<sup>6</sup> Available at: <http://pubs.naruc.org/pub/88954963-0F01-F4D9-FBA3-AC9346B18FB2>

<sup>7</sup> NARUC Draft DER Manual at 61.

<sup>8</sup> Id at 60.

<sup>9</sup> Id.

<sup>10</sup> Net Metering Report at page 10, Table 4.

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

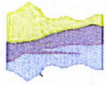
Attorney for the Idaho Conservation League

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<b>GENERAL SERVICE CUSTOMERS</b>	)	<b>PARTIAL JOINDER</b>
<b>WITH ON-SITE GENERATION.</b>	)	

**Exhibit 402**

**Idaho Conservation League Letter to Idaho Power Regarding the June 16, 2017 Net  
Metering Workshop and Status Report**



IDAHO  
CONSERVATION  
LEAGUE

208.345.6933 • PO Box 844, Boise, ID 83702 • [www.idahoconservation.org](http://www.idahoconservation.org)

Tim Tatum  
Connie Aschenbrenner  
Idaho Power Company

Tim and Connie:

June 20, 2017

Thank you for convening the June 16, 2017 meeting on Net Metering. ICL looks forward to exploring the growth of distributed energy on Idaho Power's system.

We agree with the comment of Idaho PUC Staff Stacey Donohue that the first step in the process is to define the scale and scope of distributed energy impacts in relation to other uncertainties embedded into the current rate structure. Idaho Power's net metering report makes clear that the level of impact today is quite small. ICL submits stakeholders have ample time to define the issue and consider a range of responses.

It is essential when considering distributed energy to precisely define the issue. ICL submits the only thing that makes a distributed energy customer unique from other customers is the ability to push power onto the grid. Any distributed energy customer that merely reduces their own consumption is not meaningfully different than other customers. Any analysis should focus on the actual impact of pushing energy onto the grid, not merely the ability of distributed energy to reduce consumption of utility power.

ICL believes the key question in this issue is the value of distributed energy on Idaho Power's system. If stakeholders agreed to the value, then the pricing conversation would be easier. But because stakeholders do not know if distributed energy adds or avoids costs, the pricing conversation is difficult at best. ICL encourages Idaho Power to work with stakeholders to determine an accurate value of distributed energy on the system.

This Value of Distributed Energy study should have several key features:

- Use a Technical Advisory Committee consisting of stakeholder appointees and neutral experts
- Review other similar studies to define and agree upon best methodologies
- Rely on publicly available data and transparent processes to build understanding
- Agree to the type and quality of outputs before initiating study

The study then provides the basis for future discussion on the appropriate regulatory model and rate designs. ICL encourages Idaho Power to engage in this fact finding and analysis effort before designing possible customers classifications and rates.

ICL looks forward to working with Idaho Power to refine Idaho's distributed energy policy and programs.

A handwritten signature in blue ink, appearing to read "Ben Otto".

Ben Otto  
Energy Associate

Cc: Idaho PUC - Stacey Donohue, Mike Morrison, Jonathan Farley and Karl Kline

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

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<b>WITH ON-SITE GENERATION.</b>	)	<b>PARTIAL JOINDER</b>

**Exhibit 403**

**Idaho Power Response to Staff Production Request Number 3**

**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.

Benjamin J. Otto (ISB No. 8292)  
710 N 6<sup>th</sup> Street  
Boise, ID 83701  
Ph: (208) 345-6933 x 12  
Fax: (208) 344-0344  
botto@idahoconservation.org

Attorney for the Idaho Conservation League

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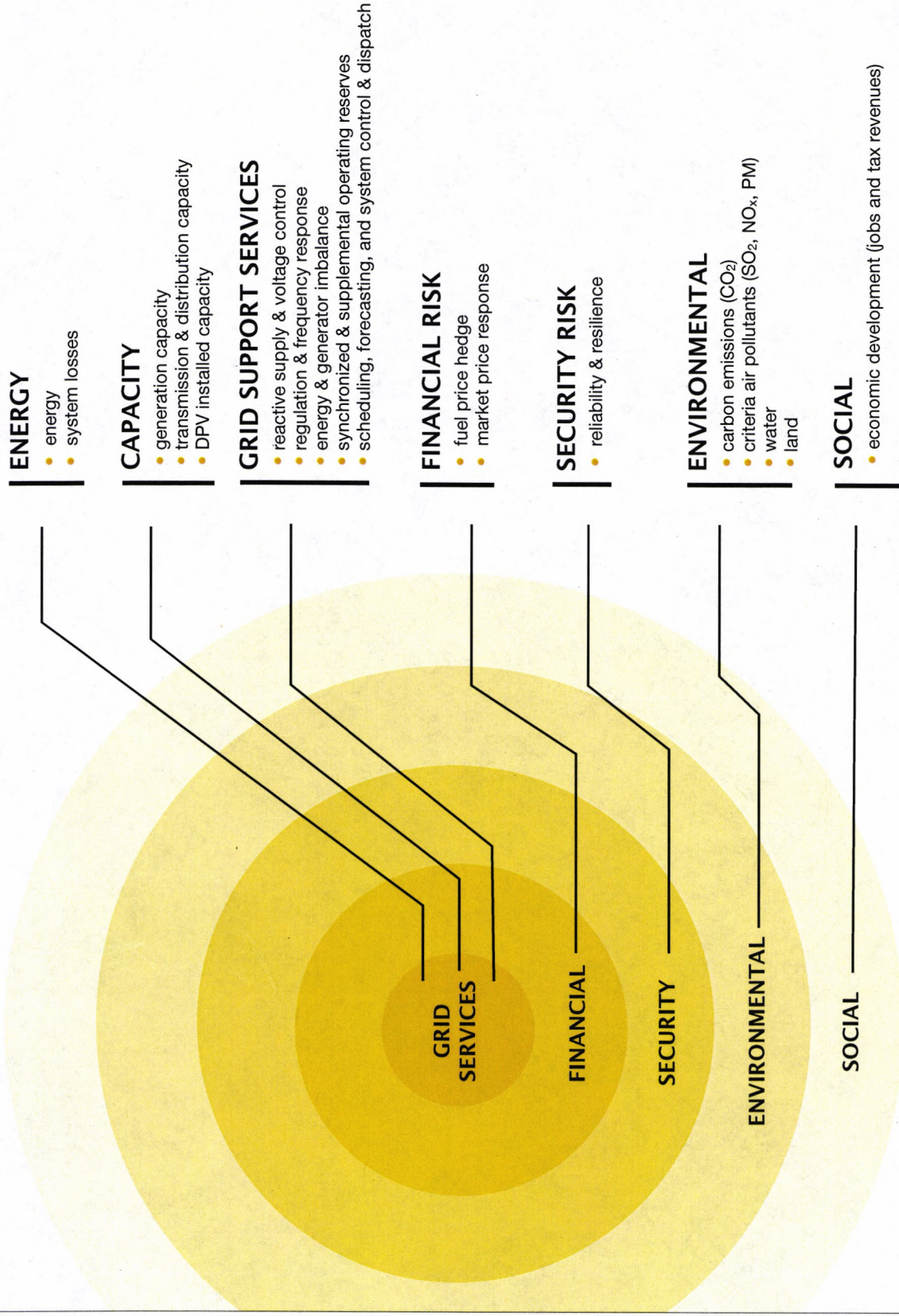
**Exhibit 404**

**Chart of Elements Included in Distributed Energy Value Studies**

**From: A Review of Solar PV Benefit and Cost Studies, 2<sup>nd</sup> Edition, Rocky Mountain  
Institute, September 2013.**

# BENEFIT & COST CATEGORIES

For the purposes of this report, **value is defined as net value, i.e. benefits minus costs**. Depending upon the size of the benefit and the size of the cost, value can be positive or negative. A variety of categories of benefits or costs of DPV have been considered or acknowledged in evaluating the value of DPV. Broadly, these categories are:



## CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of November 2017, I delivered true and correct copies of the foregoing PARTIAL JOINDER to the following persons via the method of service noted:

### Hand delivery:

Diane Hanian  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
427 W. Washington St.  
Boise, ID 83702-5983

### Electronic Mail:

*Idaho Power*  
Lisa D. Nordstrom  
Tim Tatum  
Connie Aschenbrenner  
Idaho Power Company  
P.O. Box 70  
Boise, Idaho 83707  
lnordstrom@idahopower.com  
ttatum@idahopower.com  
caschenbrenner@idahopower.com  
dockets@idahopower.com

*Idaho PUC Staff*  
Sean Costello  
Deputy Attorneys General  
Idaho Public Utilities Commission  
472 W. Washington  
Boise ID 83702  
sean.costello@puc.idaho.gov

*Idahohydro*  
C Tom Arkoosh  
Arkoosh Law Offices  
802 W Bannock St., Suite 900  
PO Box 2900  
Boise, ID 83701  
tom.arkoosh@arkoosh.com  
erin.cecil@arkoosh.com

*Idaho Irrigation Pumpers Association*  
Eric L. Olsen  
Echo Hawk & Olsen PLLC  
505 Pershing Ave., Suite 100  
PO Box. 6119  
Pocatello, ID 83205  
elo@echohawk.com

Anthony Yankel  
29814 Lake Road  
Bay Village, Ohio 44140  
Fax: 440-808-1450  
tony@yankel.net

*Auric LLC*  
Elias Bishop  
Auric Solar, LLC  
2310 S 1300 W.  
West Valley City, UT 84119  
elias.bishop@auricsolar.com

Preston N. Carter  
Deborah E. Nelson  
Givens Pursley LLC  
601 W Bannock St.  
Boise, ID 83702  
prestoncarter@givenspursley.com  
den@givenspursley.com

*Sierra Club*  
Kelsey Jae Nunez, LLC  
Sierra Club  
920 N. Clover Drive

Boise, ID 83703  
kelsey@kelseyjaenunez.com

Zack Waterman  
Idaho Sierra Club  
503 W. Franklin St.  
Boise, ID 83702  
zack.waterman@sierraclub.org  
michael.p.heckler@gmail.com

*City of Boise*  
Abigail R. Germaine  
Deputy City Attorney  
Boise City Attorney's Office  
105 N. Capitol Blvd.  
PO Box 500  
Boise, ID 83701  
agermaine@cityofboise.org

*Idaho Clean Energy Association*  
C Tom Arkoosh  
Arkoosh Law Offices  
802 W Bannock St., Suite 900  
PO Box 2900  
Boise, ID 83701  
tom.arkoosh@arkoosh.com  
erin.cecil@arkoosh.com

David H. Arkoosh  
Law Office of David Arkoosh  
PO Box 2817  
Boise, ID 83701  
david@arkoosklaw.com

*Vote Solar*  
David Bender  
Earthjustice  
3916 Nakoma Road  
Madison, WI 53711  
dbender@earthjustice.com

Briana Kober  
Vote Solar  
360 22nd Street, Suite 730  
Oakland, CA 94612  
birana@votesolar.org

J. Kahle Becker  
223 N. 6th St., Suite 325  
Boise, ID 83702  
kahle@kahlebeckerlaw.com

*Snake River Alliance and NW Energy Coalition*

John R. Hammond, Jr.  
Fischer Pusch, LLP  
101 S. Capitol Blvd., Suite 701  
PO Box 1308  
Boise, ID 83701  
jrh@fischerpusch.com

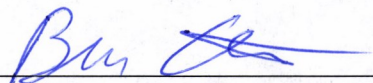
Wendy Wilson  
Executive Director, Snake River Alliance  
wwilson@snakeriveralliance.org

Diego Rivas  
Policy Associate, NW Energy Coalition  
diego@nwenergy.com

*Intermountain Wind and Solar, LLC*

Ryan B. Frazier  
Brian W. Burnett  
Kirton McConkie  
50 East Temple, Suite 400  
PO Box 45120  
Salt Lake City, UT 8411  
rfrazier@kmclaw.com  
bburnett@kmclaw.com

Intermountain Wind and Solar, LLC  
1952 West 2425 South  
Woods Cross, UT 84087  
doug@imwindandsolar.com  
dale@imwindandsolar.com



Benjamin J. Otto