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2018 MAR 22 PM 4:29
IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for the Snake River Alliance and NW Energy Coalition

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

COMES NOW the Snake River Alliance and the NW Energy Coalition (“Snake River Intervenor”) and pursuant to Idaho Public Utilities Commission Rule of Procedure 161 *et seq.*, IDAPA 31.01.01.161 *et seq.*, and *Idaho Code* § 61-617A, petitions for an award of intervenor funding and in support thereof respectfully shows as follows, to wit:

1. **List of Expenses.** As required by Rule of Procedure 162.01, attached is an itemized list of expenses that the Snake River Intervenor request to recover, broken down into categories of legal fees, and out of pocket expenses.

2. **Statement of Proposed Findings.** The recommendations that the Snake River Intervenor wish the Commission to adopt, as set forth in the Prefiled Direct Testimony of Amanda M. Levin are as follows:

ORIGINAL

- The Commission should reject Idaho Power's Application to create new customer classes for residential and small general service customers with customer-sided generation.¹
 - Idaho Power has failed to provide sufficient evidence for such a change.
 - Creating new customer classes is a significant and substantial change, and should only be taken after robust, transparent, evaluation of the costs and benefits these customers contribute to the system and meaningful stakeholder engagement.
 - Creation of separate rate classes at this time runs counter to the state energy policy and other public policy objectives. Furthermore, it could result in new administrative inefficiencies, increased rate volatility for net metered customers, and discourage customers from investing in clean energy technologies.
- The Commission should instead first open a comprehensive, general investigation into the costs and benefits of distributed energy resources, the profile and costs of serving self-generating customers, and rate design approaches that would include all stakeholders.
 - To inform this process and any future rate or cost-of-service changes, the Commission should order Idaho Power to begin collecting and compiling data on the load and energy profiles of its net metering customers and the associated costs and benefits of customer-sided generation in the Company's territory.

3. **Statement Showing Costs.** *See* the Affidavits of John R. Hammond, Jr. and Amanda M. Levin, filed herewith.

4. **Explanation of Cost Statement.** *See* the Affidavits of John R. Hammond Jr., and Amanda M. Levin, filed herewith.

5. **Statement of Difference.** The Snake River Intervenors discussed and proposed consideration of the foregoing specific matters that the Commission Staff did not address in great detail:

¹ *See Prefiled Direct Testimony of Amanda M. Levin* at pp. 3-4.

- Although Staff acknowledged that Idaho Power had not provided sufficient evidence to justify the creation of new rate classes and that certain data should be studied, the Snake River Intervenors made specific recommendations on what types of data the Commission should order Idaho Power to compile and analyze moving forward in furtherance of a future generic docket, such as:²

- The hourly usage and demand of DG customers;
- Geographic information of the spatial distribution and size of projects at a sub-station level;
- Coincident and non-coincident peaks of DG and non-DG customers for residential and small general service classes separately;
- Estimated average annual fixed cost recovery for DG and non-DG residential and small general service customers;
- The average percentage of "full costs of service" recovered from DG and non-DG customers, by class; and
- The proportion and absolute number of customers who net out their monthly or annual usage with customer-sided systems.

- The Snake River Intervenors discussed proceedings in other jurisdictions, the process each has employed and matters considered.³

- The Snake River Intervenors also discussed that with advanced metering infrastructure ("AMI"), many customers can have a two-way or bi-directional relationship with the grid, i.e., those with "smart" (grid-enabled) appliances and thermostats. These smart devices in a customer's house can dynamically respond to and communicate with the grid and the utility.⁴

- Given customer protections and concerns, the Commission and the Company may consider conducting representative surveys while collecting data. These surveys could

² See *Prefiled Direct Testimony of Amanda M. Levin* at pp. 12-13.

³ *Id.* at pp. 15-21.

⁴ *Id.* at 4-6.

anonymously record data on household size, square footage, installation of smart appliances or thermostats, and/or household income for both DG and non-DG customers. This could help provide some additional context and insight into the demographic implications of net metering, while respecting customer protections.⁵

- The Snake River Intervenors also recommended that any future decisions regarding rate classes and rate methodologies should:⁶
 - Not infringe on the ability for customers to install storage, distributed generation, or energy efficiency technologies and reduce their consumption of grid electricity.
 - Be gradual.
 - Be sustainable, clear, and fair.
 - Solar compensation rates should reflect the full benefits.
 - Promote synergistic behavior and technology adoption.
 - Allow for and incentivize the adoption of distributed generation coupled with storage or electric vehicles; ensure that barriers to customer adoption of these newer technologies are not created.

6. **Statement of Recommendation.** As reflected by the unprecedented amount of public comments filed in the proceeding, the Snake River Intervenors advocacy addressed issues of concern to present and future net meter customers, all residential and small general service customers and of concern to businesses that provide service to net metering customers.

7. **Statement Showing Class of Customers.** Present and future net meter customers affected by the proceeding are members of the residential and small general service customers classes.

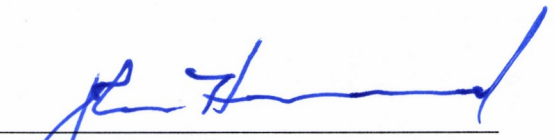
⁵ *Id.* at p. 14.

⁶ *Id.* at pp. 25-26.

WHEREFORE the Snake River Intervenors respectfully request that this petition be granted in the total cumulative amount of **7,826.29**.

DATED this 22nd day of March, 2018.

FISHER PUSCH LLP



John R. Hammond Jr.
Attorney for Intervenors Snake River Alliance and NW Energy Coalition

List of Expenses that the Snake River Intervenors Request to Recover:

Attorney Fees of John R. Hammond Jr.: \$7,500.00

Expert Witness Costs of Amanda M. Levin:

Travel – Lodging \$250.39

Travel – Meals \$59.90

Transportation – Rail Services \$16.00

Total: **\$7,826.29**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of March, 2018, I served a true and correct copy of the foregoing by delivering the same to each of the following individuals by electronic mail, addressed as follows:

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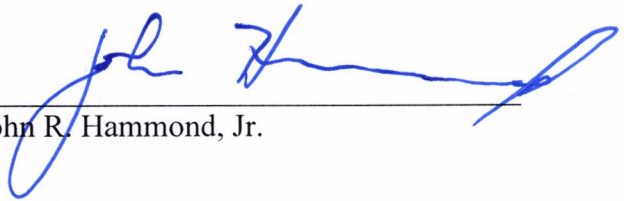
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