

SEAN COSTELLO  
DEPUTY ATTORNEY GENERAL  
IDAHO PUBLIC UTILITIES COMMISSION  
PO BOX 83720  
BOISE, IDAHO 83720-0074  
(208) 334-0312  
IDAHO BAR NO. 8743

RECEIVED

2018 JUN -5 PM 1:18

IDAHO PUBLIC  
UTILITIES COMMISSION

Street Address for Express Mail:  
472 W. WASHINGTON  
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE APPLICATION OF )</b>	
<b>IDAHO POWER COMPANY FOR AUTHORITY )</b>	<b>CASE NO. IPC-E-17-13</b>
<b>TO ESTABLISH NEW SCHEDULES FOR )</b>	
<b>RESIDENTIAL AND SMALL GENERAL )</b>	<b>STAFF'S RESPONSE TO VOTE</b>
<b>SERVICE CUSTOMERS WITH ON-SITE )</b>	<b>SOLAR'S PETITION FOR</b>
<b>GENERATION )</b>	<b>RECONSIDERATION</b>
<b>)</b>	

**BACKGROUND**

On May 29, 2018, Vote Solar filed a Petition for Reconsideration (“Petition”) of Commission Order No. 34046 (“Final Order”). The Final Order directed Idaho Power (“Company”) to close Schedule 84 to all current and future Residential and Small General Service (“R&SGS”) customers with on-site generation meaning all customers with on-site generation, whether they export energy to the grid or not, are now within the Company’s new Schedules 6 and 8. In its Petition, Vote Solar seeks reconsideration of the scope of Schedules 6 and 8 and requests that the Commission require the Company to revise Schedules 6 and 8 to apply only to customers who export electricity to the Company’s grid. Vote Solar’s Petition for Reconsideration at 1.

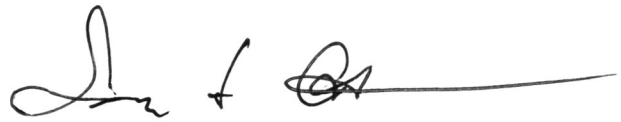
Vote Solar argues that the Commission’s findings, conclusions, and reasoning were specific to customers who both import and export energy, and do not support a decision to place customers who generate, but who do not export, into the new rate classes. *Id.* at 3-6.

**STAFF RECOMMEDATIONS**

Staff generally concurs with the analysis presented in Vote Solar’s Petition for Reconsideration. Staff maintains that those customers who are *incapable* of exporting energy to the grid should be exempt from inclusion in Schedules 6 and 8. Therefore, Staff recommends that the Commission require the Company to revise its new Schedules 6 and 8 to apply only to customers with on-site generation who do not 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.

Staff also believes correcting this portion of the record may have the effect of fostering compromise in the forthcoming Idaho Power net metering docket related to costs, benefits, rates, rate design, and compensation for net excess energy. By making customers in Schedules 6 and 8 more similar to each other, disagreements over the appropriate inputs and analysis to utilize in that docket may be limited. More homogenous customer classes would also reduce Schedule 6 and 8 intra-class subsidies because on-site generation customers who do not export energy to the grid will not be assigned rates that include any costs associated with customers who export energy.

Respectfully submitted this 5<sup>th</sup> day of June 2018.



Sean Costello  
Deputy Attorney General

Umisc/Comments/ipce17.13sc reconsideration response

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 5TH DAY OF JUNE 2018, SERVED THE FOREGOING **STAFF'S RESPONSE TO VOTE SOLAR'S PETITION FOR RECONSIDERATION**, IN CASE NO. IPC-E-17-13, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

LISA D NORDSTROM  
REGULATORY DOCKETS  
IDAHO POWER COMPANY  
PO BOX 70  
BOISE ID 83707-0070  
E-MAIL: [lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

TIMOTHY E TATUM  
CONNIE ASCHENBRENNER  
IDAHO POWER COMPANY  
PO BOX 70  
BOISE ID 83707-0070  
E-MAIL: [ttatum@idahopower.com](mailto:ttatum@idahopower.com)  
[caschenbrenner@idahopower.com](mailto:caschenbrenner@idahopower.com)

C TOM ARKOOSH  
ARKOOSH LAW OFFICES  
802 W BANNOCK ST STE 900  
PO BOX 2900  
BOISE ID 83701  
E-MAIL: [tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)  
[erin.cecil@arkoosh.com](mailto:erin.cecil@arkoosh.com)

MATTHEW A NYKIEL  
ID CONSERVATION LEAGUE  
102 S EUCLID #207  
PO BOX 2308  
SANDPOINT ID 83864  
E-MAIL: [mnykiel@idahiconservation.org](mailto:mnykiel@idahiconservation.org)

ELIAS BISHOP  
AURIC SOLAR LLC  
2310 S 1300 W  
W VALLEY CITY UT 84119  
E-MAIL: [elias.bishop@auricsolar.com](mailto:elias.bishop@auricsolar.com)

ERIC L OLSEN  
ECHO HAWK & OLSEN PLLC  
PO BOX 6119  
POCATELLO ID 83205  
E-MAIL: [elo@echohawk.com](mailto:elo@echohawk.com)

ANTHONY YANKEL  
12700 LAKE AVENUE  
UNIT 2505  
LAKEWOOD OH 44107  
E-MAIL: [tony@yankel.net](mailto:tony@yankel.net)

KELSEY JAE NUNEZ LLC  
920 N CLOVER DR  
BOISE ID 83703  
E-MAIL: [kelsey@kelseyjaenunez.com](mailto:kelsey@kelseyjaenunez.com)

TOM BEACH  
CROSSBORDER ENERGY  
2560 9<sup>TH</sup> STREET, SUITE 213A  
BERKELEY CA 94710  
E-MAIL: [tomb@crossborderenergy.com](mailto:tomb@crossborderenergy.com)

**ELECTRONIC ONLY**  
MICHAEL HECKLER  
[michael.p.heckler@gmail.com](mailto:michael.p.heckler@gmail.com)  
ZACK WATERMAN  
[zack.waterman@sierraclub.org](mailto:zack.waterman@sierraclub.org)

ABIGAIL R GERMAINE  
DEPUTY CITY ATTORNEY  
BOISE CITY ATTORNEY'S  
PO BOX 500  
BOISE ID 83701-0500  
E-MAIL: [agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

DAVID BENDER  
EARTHJUSTICE  
3916 NAKOMA ROAD  
MADISON WI 53711  
E-MAIL: [dbender@earthjustice.org](mailto:dbender@earthjustice.org)

JOHN R HAMMOND JR  
FISHER PUSCH LLP  
PO BOX 1308  
BOISE ID 83701  
E-MAIL: [jrh@fisherpusch.com](mailto:jrh@fisherpusch.com)

RYAN B FRAZIER  
BRIAN W BURNETT  
KIRTON McCONKIE  
PO BOX 45120  
SALT LAKE CITY UT 84111  
E-MAIL: [rfrazier@kmclaw.com](mailto:rfrazier@kmclaw.com)  
[bburnett@kmclaw.com](mailto:bburnett@kmclaw.com)

PRESTON N CARTER  
DEBORAH E NELSON  
GIVENS PURSLEY LLP  
601 W BANNOCK ST  
PO BOX 2720  
BOISE ID 83701  
E-MAIL: [prestoncarter@givenspursley.com](mailto:prestoncarter@givenspursley.com)  
[den@givenspursley.com](mailto:den@givenspursley.com)

BRIANA KOBOR  
VOTE SOLAR  
986 PRINCETON AVENUE S  
SALT LAKE CITY UT 84105  
E-MAIL: [briana@votesolar.org](mailto:briana@votesolar.org)

**ELECTRONIC ONLY**  
SNAKE RIVER ALLIANCE  
[wwilson@snakeriveralliance.org](mailto:wwilson@snakeriveralliance.org)

NW ENERGY COALITION  
[diego@nwenergy.org](mailto:diego@nwenergy.org)

DOUG SHIPLEY  
INTERMOUNTAIN WIND AND  
SOLAR LLC  
1953 WEST 2425 SOUTH  
WOODS CROSS UT 84087  
E-MAIL: [doug@imwindandsolar.com](mailto:doug@imwindandsolar.com)

  
\_\_\_\_\_  
SECRETARY