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IDAHO PUBLIC  
UTILITIES COMMISSION

January 17, 2020

**VIA HAND DELIVERY**

Diane Hanian, Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Boulevard  
Building 8, Suite 201-A  
Boise, Idaho 83714

Re: Case No. IPC-E-18-15  
Study of Costs, Benefits, and Compensation of Net Excess Energy Supplied  
by Customer On-Site Generation  
Idaho Power Company's Answer/Cross-Petition to Petitions for  
Reconsideration

Dear Ms. Hanian:

Enclosed for filing in the above matter please find an original and seven (7) copies of Idaho Power Company's Answer/Cross-Petition to Petitions for Reconsideration in the above matter.

If you have any questions about the enclosed documents, please do not hesitate to contact me.

Very truly yours,



Lisa D. Nordstrom

LDN:kkt

Enclosures

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UTILITIES COMMISSION

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION )	CASE NO. IPC-E-18-15
OF IDAHO POWER COMPANY TO )	
STUDY THE COSTS, BENEFITS, AND )	IDAHO POWER COMPANY'S
COMPENSATION OF NET EXCESS )	ANSWER/CROSS-PETITION TO
ENERGY SUPPLIED BY CUSTOMER )	PETITIONS FOR
ON-SITE GENERATION )	RECONSIDERATION
_____ )	

On December 20, 2019, the Idaho Public Utilities Commission ("Commission") issued Order No. 34509 rejecting a Settlement Agreement<sup>1</sup> intended to resolve on-site generation issues for residential and small general service ("R&SGS") customers. Order No. 34509 also established the criteria under which existing customers with on-site generation could continue to net meter under the terms in place as of December 20, 2019.

On January 10, 2020, Micah Hornback, Idaho Clean Energy Association ("ICEA"), and the Idaho Conservation League ("ICL") and Vote Solar (collectively, "the Grandfather Extension Petitioners") filed Petitions for Reconsideration. The Grandfather Extension

<sup>1</sup> Motion to Approve Settlement Agreement, Case No. IPC-E-18-15 (filed October 11, 2019).

Petitioners asked the Commission to reconsider their ruling on the finite grandfathering period outlined in Order No. 34509. Additionally, Thomas Baskin filed a Petition for Reconsideration on January 10, 2020, asking the Commission for clarification/reconsideration on how a system expansion would impact a customer's grandfathered status (collectively referred to as "Petitioners").

Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* § 61-626 and RP 331.02 and 331.05, files this Answer/Cross-Petition<sup>2</sup> to the petitions for reconsideration filed on January 10, 2020.<sup>3</sup> Idaho Power will explain (1) why the recommendation made by the Grandfather Extension Petitioners should be rejected and how Idaho Power's recommendation proposed in its Petition for Reconsideration filed January 10, 2020, addresses the concerns expressed by the Grandfather Extension Petitioners, and (3) the Company's interpretation of the Commission's direction regarding system expansions.

Acceptance of the Grandfather Extension Petitioners' proposed grandfathering extension would inappropriately impose higher costs on Idaho Power's non-net metering customers in order to provide economic certainty to solar installers and prospective solar buyers. The Commission could provide the desired certainty referenced by the Grandfather Extension Petitioners by adopting the recommendations made by Idaho Power in its Petition for Reconsideration. Therefore, Idaho Power respectfully requests the Commission reject the Petitioners' recommendations and alternatively reconsider

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<sup>2</sup> RP 331.05 describes answers to petitions for reconsideration as "(pleadings that disagree with a petition for reconsideration, but do not ask for affirmative relief from the Commission's orders)." Because the Company requests the "affirmative relief" described in its Petition for Reconsideration filed January 10, 2020, Idaho Power also characterizes this pleading as a cross-petition to facilitate that result.

<sup>3</sup> On January 16, 2020, Idaho Power separately filed an Answer/Cross-Petition to Richard Kluckhohn's Petition for Reconsideration.

Order No. 34509 to adopt the recommendations made by Idaho Power in its Petition for Reconsideration.

## **I. EXTENTION OF GRANDFATHER ELIGIBILITY**

The Grandfather Extension Petitioners generally request the Commission reconsider its decision to limit the grandfather eligibility period in Order No. 34909 and extend the eligibility date for grandfathering to include all customers who install on-site generation until the Commission has approved a successor program to replace the existing net metering offering.

### **A. Idaho Power Acknowledges Uncertainty Concerns.**

In each of their petitions for reconsideration, the Grandfather Extension Petitioners explain that, without having a successor program in place, potential R&SGS on-site generation customers will be left with uncertainty<sup>4</sup> and it will be difficult for installers to provide accurate information.<sup>5</sup> ICL and Vote Solar explain that “this level of uncertainty makes it very difficult for distributed energy system providers to give accurate information to the public” and that “[with] no successor program in place, providers are unable to make informed disclosures.”<sup>6</sup> ICEA went as far as to say that: “Many customers and installers might find it easiest to evaluate an investment based on existing rates even while recognizing (and disclosing) that changes are anticipated.”<sup>7</sup> ICEA described what it thought would be the result of this uncertainty and potential misinformation when it said:

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<sup>4</sup> ICL and Vote Solar’s Petition for Reconsideration, pp. 1-2; ICEA Petition for Reconsideration, p. 3; Hornback Petition for Reconsideration, p. 1.

<sup>5</sup> ICL and Vote Solar’s Petition for Reconsideration, p. 2; Hornback Petition for Reconsideration, p. 1; ICEA Petition for Reconsideration, pp. 2-3.

<sup>6</sup> ICL and Vote Solar’s Petition for Reconsideration, p. 2.

<sup>7</sup> ICEA’s Petition for Reconsideration, p. 3.

“This breeds confusion and, ultimately, customer discontent both now and if changes are proposed in the future.”<sup>8</sup>

Idaho Power generally shares the same concerns as the Grandfather Extension Petitioners; however, the Grandfather Extension Petitioners’ proposed method of addressing those concerns would inappropriately lock-in an avoidable cost shift to non-net metering customers. The Commission could provide the desired certainty referenced by the Grandfather Extension Petitioners by adopting the recommendations made by Idaho Power in its Petition for Reconsideration

**B. Extension of Grandfather Eligibility Would Financially Harm Non-Participants.**

Idaho Power does not believe extension of grandfather eligibility best serves the entirety of its 465,000 R&SGS customers. If reconsideration is granted, Idaho Power will present evidence describing the annual and long-term financial impact to R&SGS customers without on-site generation. It will also present evidence supporting the more reasonable alternatives set forth in the Company’s Petition for Reconsideration.

Based on the Company’s initial comprehensive study addressing on-site generation,<sup>9</sup> the Company has projected the estimated additional cost shift if the Commission were to adopt the Grandfather Extension Petitioners’ recommendation to extend the eligibility date for grandfathering to include all customers who install on-site generation up until the Commission has approved a successor program to replace the

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<sup>8</sup> ICEA’s Petition for Reconsideration, p. 3.

<sup>9</sup> The Company’s initial comprehensive study was based on (i) a class cost-of-service study performed in the same manner as those performed for general rate cases, and (ii) quantification of the revenue deficiency that exists under net metering and net hourly billing. See Motion to Approve Settlement Agreement, Att. 1-7 to Att. 4 for the cost-of-service study. See Motion to Approve Settlement Agreement, Att. 9 to Att. 4 for the quantification of revenue deficiency.

existing net metering offering. An excerpt of the relevant portion of this study which quantifies the existing cost shift is included in Figure 1.<sup>10</sup>

**Figure 1. 2017 Cost Shift for R&SGS On-Site Generation Customer Classes**

IDAHO POWER COMPANY  
NET METERING HOURLY BILLING RESULTS  
TWELVE MONTHS ENDING DECEMBER 31, 2017

		Residential On-Site Generation		Small Gen. On-Site Generation	
		Net Monthly Billing	Net Hourly Billing	Net Monthly Billing	Net Hourly Billing
(a)	Revenue Requirement	\$1,434,220	\$1,434,220	\$35,353	\$35,353
(b)	Revenue	\$983,286	\$1,311,651	\$17,674	\$27,176
(c) [a - b]	<b>Cost-Shift</b>	<b>(\$450,934)</b>	(\$122,569)	<b>(\$17,678)</b>	(\$8,177)

Based on the annual cost shift per on-site generation customer identified in the cost-of-service study of approximately \$415 for residential on-site generation customers and \$515 for small general service on-site generation customers, the Company estimates an ongoing annual cost shift of \$2.2 million for the initial group<sup>11</sup> of customers grandfathered by Order No. 34509. The Company currently collects under recovery of fixed costs through its Fixed Cost Adjustment mechanism, passing along any cost shift to all R&SGS customers, including non-participants.

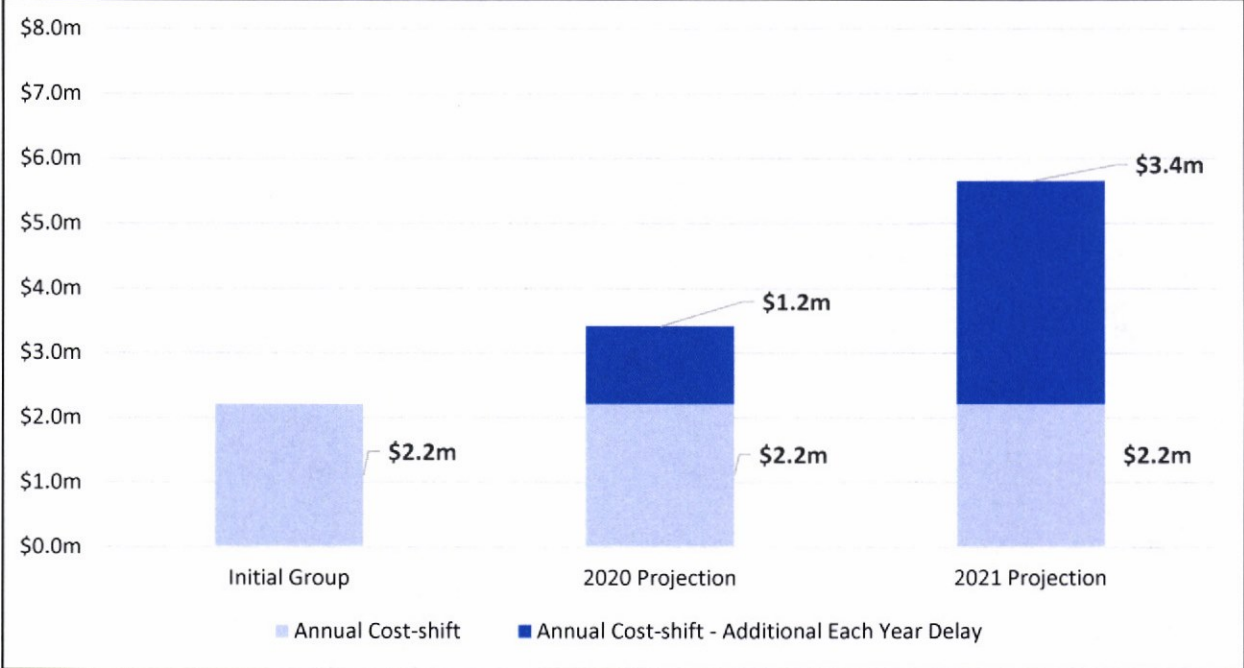
Given that it could easily take one or two years for interested parties to complete the study on the costs and benefits of distributed on-site generation to the Company's system, it is not reasonable or in the best interest of Idaho Power's other customers to extend the grandfathered eligibility date until the Commission approves a successor offering. To estimate the additional cost shift associated with the new on-site generation customers if the Commission were to extend the eligibility date, the Company forecasted

<sup>10</sup> Motion to Approve Settlement Agreement, Att. 9 to Att. 4.

<sup>11</sup> The initial group consists of 5,010 customers as of December 20, 2019, and 309 applications for which Idaho Power has received documentation of financial commitment through the afternoon of January 15, 2020. The final number of grandfathered customers will not be known until after the date of this filing, but the Company had received an additional approximately 250 applications for which it has not yet received documentation of financial commitment.

R&SGS on-site generation customer growth for 2020 and 2021 in a manner consistent with a forecast test period used in rate change filings. The projected R&SGS customer counts for grandfathered customers are 8,209, and 13,628 in 2020 and 2021, respectively. These customers represent an additional ongoing annual cost shift of approximately \$1.2 million and \$3.4 million if the Commission were to extend the eligibility date until the end of 2020 or 2021, respectively. The results of the Company's estimated ongoing cost shift using historical growth rates are depicted in Table 1.

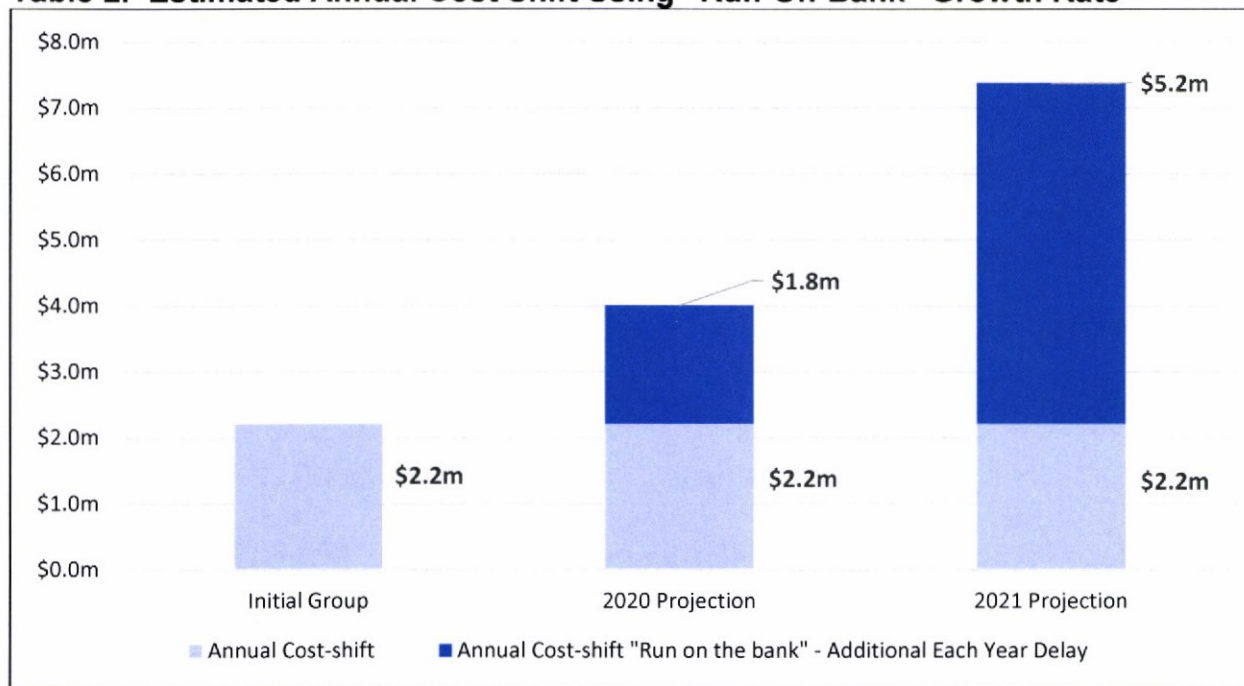
**Table 1. Estimated Annual Cost Shift Using Historical Growth Rates**



Moreover, if the Commission were to set an open-ended date in the future for customers to be grandfathered, it would surely cause a “run on the bank” scenario where application rates increase significantly in anticipation of imminent less favorable terms. Assuming a “run on the bank” occurred, using historical growth rates would be an overly conservative estimate; NV Energy experienced net-metering customer growth of 68 percent over a five-month period after signaling future changes to its net metering

program in Nevada.<sup>12</sup> It would not be unreasonable to assume the adoption rate would increase by 50 percent more than Idaho Power's existing customer growth forecast. The Company estimates the additional ongoing annual cost shift under the "run on the bank" scenario with customer growth 50 percent greater than its own forecast to be \$1.8 million and \$5.2 million if the Commission were to extend the eligibility date until the end of 2020 or 2021, respectively. The results of the Company's estimated cost shift using the "run on the bank" scenario is depicted in Table 2.

**Table 2. Estimated Annual Cost Shift Using "Run-On-Bank" Growth Rate**



Idaho Power recognizes the Commission's desire to minimize cost shifting to non-participants by limiting grandfathered participants to those customers with existing systems or binding financial commitments to install them on the service date of Order No.

<sup>12</sup> On July 31, 2015, when NV Energy originally proposed to change net-metering compensation, there were 10,540 interconnected solar systems. On January 1, 2016, when the new rates came into effect, there were 17,655 interconnected systems. <https://www.greentechmedia.com/articles/read/nevada-net-metering-decision>



34509.<sup>13</sup> As described below, Idaho Power believes the solutions proposed in the Company's Petition for Reconsideration reasonably balance concerns about cost shifting to non-participants with certainty for future participants.

**C. Recommendations in Idaho Power's Reconsideration Petition Provide Reasonable Solutions.**

In its Petition for Reconsideration, Idaho Power requested the Commission approve the Settlement Agreement on reconsideration, or alternatively, (1) immediately implement net hourly billing for new Schedule 6 and Schedule 8 customers with no immediate change to the compensation value, which ensures a neutral financial impact to those customers during this interim period, and (2) initiate a public process to explore the appropriate value to be assigned to hourly exported energy from all non-grandfathered on-site generators (i.e., Export Credit Rate) in the future.<sup>14</sup> Either solution has four benefits:

1. Establish a Clear Distinction Between Classes of Customers

If the Commission reconsidered the Settlement Agreement or alternatively immediately implemented net hourly billing (with no immediate change to the compensation value for non-grandfathered Schedule 6 and Schedule 8 customers), the Commission would more clearly create the distinction it explained in its order<sup>15</sup> by implementing the new net hourly offering for on-site generation customers who do not meet the eligibility criteria for grandfathering.

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<sup>13</sup> Order No. 34509, pp. 14-15.

<sup>14</sup> Idaho Power's Petition for Reconsideration, p. 27.

<sup>15</sup> Order No. 34509, p. 10 ("After the issuance of this Order, however, we believe it will no longer be reasonable for a customer to assume the net-metering program fundamentals will remain the same over the expected payback period of their investment").

## 2. Enhance Bill Clarity for Customers and Installers

If the Commission reconsidered the Settlement Agreement or alternatively immediately implemented net hourly billing (with no immediate change to the compensation value for non-grandfathered Schedule 6 and Schedule 8 customers), customers would begin to clearly understand the fundamentals of net hourly billing. Perhaps more importantly, customers will have the energy amounts (net hourly consumption and net hourly excess generation) printed on their bills that enable them to estimate the potential impacts of the future Export Credit Rate that will be determined in the upcoming study.<sup>16</sup>

## 3. Installers Will Have Accurate Information to Share with Customers

If the Commission reconsidered the Settlement Agreement or alternatively immediately implemented net hourly billing with no immediate change to the compensation value for non-grandfathered Schedule 6 and Schedule 8 customers, installers would be able to provide accurate information to the public and have an accurate and consistent source for the numbers and assumptions they use to make payback calculations. ICEA expressed the importance of accurate and consistent numbers when it said: "An accurate and consistent source for the numbers and assumptions used to make payback calculations is important for purposes of solar installers' compliance with the statute, and to ensure that customer receive information that is as consistent and accurate as possible."<sup>17</sup>

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<sup>16</sup> Idaho Power's Petition for Reconsideration, p. 27.

<sup>17</sup> ICEA's Petition for Reconsideration, p. 2.

#### 4. No Immediate Impact to Customers

In Idaho Power's Petition for Reconsideration, the Company explained that the alternative recommendation to immediately implement net hourly billing with no immediate change to the compensation value for non-grandfathered on-site generation customers, would have no financial impact to customers. The Company explained how it would implement net hourly billing with no financial impact to customers,

The Company will base both the energy consumption rate and the Export Credit Rate at the same retail rate, which will result in a neutral financial impact to customers. That is, the Company will immediately begin netting on an hourly basis, but because for the time being the energy consumption and crediting rates will be the same amount, the ultimate amount charged or credited to the new Schedule 6 and Schedule 8 customers during this period will be the same as it would have been under a monthly netting billing construct.<sup>18</sup>

The Settlement Agreement likewise contained provisions that transitioned on-site generation customers to the new Export Credit Rate over eight years that, if approved on reconsideration, would not result in a gradual rate reduction toward the lower Export Credit Rate until January 1, 2022.<sup>19</sup>

## **II. SYSTEM EXPANSION GRANDFATHER ELIGIBILITY**

As part of the Commission's specifics on grandfathering, the Commission stated, "we are grandfathering the customer at the meter site at the originally installed nameplate capacity of the system."<sup>20</sup> Idaho Power interprets this language from the Commission to

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<sup>18</sup> Idaho Power's Petition for Reconsideration, pp. 27-28.

<sup>19</sup> Motion to Approve Settlement Agreement, Attachment 1, Section IV.G., Transition Period, p. 4.

<sup>20</sup> Order No. 34509, p. 15.

mean that, if the customer installs any expansion to their system, said customer would forfeit their grandfathered status for their entire system.

Mr. Baskin filed a Petition for Reconsideration asking the Commission to clarify its intent on how a system expansion would impact a customer's grandfathered status. Mr. Baskin suggests in his Petition that he believes Idaho Power's interpretation of the Commission's directive on this issue is incorrect. Mr. Baskin suggests a different interpretation, that "some simple rule could be established to define what percentage of my power generation should be subject to the grandfathered export credit rate."<sup>21</sup>

Idaho Power requests the Commission deny Mr. Baskin's request to grandfather material expansions of the originally installed system nameplate capacity. Mr. Baskin's suggestion that the Company could define a percentage of the generation to be grandfathered is not practical, or even possible with a single metered point of delivery. Such a calculation would require combining two different billing constructs such as net monthly billing and net hourly billing – which use different measured billing determinants over different time periods – and would require costly, customized change(s) to Idaho Power's billing system.

As an alternative, to accommodate minor system changes resulting from replacement of system components, Idaho Power would not be opposed if the Commission were to reconsider its directive on system expansions such that "the customer may not increase the capacity of the system by more than a total of 10 percent

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<sup>21</sup> Thomas Baskin's Petition for Reconsideration, p. 2.

or 1 kW, whichever is greater” in order to retain their grandfathered status. This is consistent with a ruling made by the California Public Utility Commission:

Renewable generation systems eligible for the 20-year transition period adopted in this decision that are modified or repaired shall remain eligible for the remainder of their original transition period, as long as the modifications or repairs do not increase the system's generation by more than the greater of 10 percent of the system's capacity at the time the customer completes all application requirements to receive permission to operate (marking the beginning of the system's specific 20-year transition period) or 1 kilowatt, not to exceed a total generation capacity of 1 megawatt, and are sized to meet but not exceed the customer's annual onsite load.<sup>22</sup>

Arizona Public Service similarly implemented the same criteria to limit expansion of grandfathered systems: “Over the term of the grandfathering period, a Customer may not increase the capacity of their grandfathered solar generation unit by more than a total of 10% or 1 kW, whichever is greater.”<sup>23</sup>

### **III. CONCLUSION**

Idaho Power believes the recommendations made by the Petitioners in their Petitions to extend the eligibility date for grandfathering is not in the best interest of all R&SGS customers. Idaho Power believes the recommendations made in Idaho Power's Petition for Reconsideration better address the concerns expressed by the Petitioners while creating a clear distinction between grandfathered and non-grandfathered customers. Consequently, and pursuant to the reasons set forth above and in evidence

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<sup>22</sup> California Public Utilities Commission, Order Instituting Rulemaking Regarding Policies, Procedures and Rules for the California Solar Initiative, the Self-Generation Incentive Program and Other Distributed Generation Issues, R.12-11-005, Decision 14-03-041, p. 39 (issued April 4, 2014).

<sup>23</sup> Arizona Public Service Company, Rate Rider Legacy EPR-6 (frozen), A.C.C. No. 5959 (effective August 17, 2017).

in the record, Idaho Power respectfully requests the Commission deny the Grandfather Extension Petitioners' request for reconsideration and instead reconsider Order No. 34509 on the recommendations made by Idaho Power in its Petition for Reconsideration. Idaho Power also respectfully requests the Commission affirm the Company's interpretation of "nameplate capacity" as it relates to system expansions for the evaluation of a customers grandfathered status.

Respectfully submitted this 17<sup>th</sup> day of January 2020.

  
LISA D. NORDSTROM  
Attorney for Idaho Power Company

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 17<sup>th</sup> day of January 2020 I served a true and correct copy of IDAHO POWER COMPANY'S ANSWER/CROSS-PETITION TO PETITIONS FOR RECONSIDERATION upon the following named parties by the method indicated below, and addressed to the following:

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