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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Idaho Clean Energy Association

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION
OF IDAHO POWER COMPANY TO
STUDY COSTS, BENEFITS, AND
COMPENSATION OF NET EXCESS
ENERGY SUPPLIED BY CUSTOMER
ON-SITE GENERATION

Case No. IPC-E-18-15

IDAHO CLEAN ENERGY ASSOCIATION,
INC.'S PETITION FOR RECONSIDERATION

The Idaho Clean Energy Association, Inc. ("ICEA") respectfully requests that the Commission reconsider the portion of Order No. 34509 regarding the eligibility date for customers to remain on Schedules 6 and 8.

ICEA appreciates the Commission's determination that existing customers are differently situated from future customers such that the two groups may be treated differently in terms of rate and rate structure. ICEA also appreciates, and is sensitive to, the Commission's statements that existing customers appear not to have fully understood the type and degree of changes that could occur to the net metering program. Finally, ICEA recognizes the importance of, and completely supports, full disclosure to potential customers. ICEA supported passage of the Residential Solar Energy System Disclosure Act, Idaho Code § 48-1805, for this reason. ICEA's sensitivity to these issues motivates this request for reconsideration.

As the Commission recognized, customers invest significant sums in on-site generation and the investment amount is not spread among the Company's rate base. Order No. 34509 at 3-4. The payback period for a solar system is an important component of the customer's decision, and the payback period is sensitive to program changes. *Id.* at 3, 12.

Under Idaho Code § 48-1805, solar installers must provide several statutory disclosures to customers. Idaho Code § 48-1805(c). In addition to the statutory disclosures, solar installers must provide any written estimates of the projected savings of the system; estimated savings over the life of the solar agreement or over the anticipated useful life of the system; any material assumptions used to calculate estimated projected savings; and the source of those assumptions. Idaho Code § 48-1805(2)(a) & (b).¹

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.

Order No. 34509 disapproved the proposed settlement; established a process for a comprehensive study that will form the basis for potential future changes; and grandfathered certain existing customers. Order No. 34509 at 1. However, the Order does not establish a net metering program for the interim period between the date of the order and the date of anticipated program changes.

Based on conversations that ICEA has had with its members, solar installers understand and respect the Commission's decision. However, there is considerable confusion regarding how to proceed in the interim period. Solar installers simply do not know what numbers and

¹ The Commission noted the statutory disclosures. Order No. 34509 at 13. ICEA agrees that these disclosures are important. ICEA also submits that it is important to provide the most uniform, accurate estimates possible. In ICEA's experience, customers are accustomed to—perhaps even desensitized to—a wide variety of warnings and disclosures. Disclosures are important but should be coupled with the most accurate estimates possible.

assumptions to use for anticipated payback calculations. This confusion is exacerbated by the vast difference between existing rates and the settlement agreement. A calculation based on existing rates might show an attractive payback while a calculation based on the figures in the settlement agreement might not. Further, the terms of the settlement agreement are complex, and our members would need to invest to build the tools and skills needed to evaluate investments under the settlement agreement. Neither customers nor installers have a clear resource from which to obtain consistent, reasonable numbers and assumptions to calculate payback periods and to otherwise inform customer decision-making.


Given the confusion about what numbers and assumptions to use, ICEA anticipates that, through no fault of their own, installers will present, and customers will be presented with, payback estimates that vary widely from installer to installer. 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. ICEA is concerned that in this interim period before those changes are defined, the customer will not have sufficient information to understand or evaluate the impact of future changes. This breeds confusion and, ultimately, customer discontent both now and if changes are proposed in the future.

ICEA would again like to emphasize the importance of full disclosure and accurate estimates. Both are key to customer satisfaction and the long-term success of the industry in Idaho. ICEA has worked with its members, and will continue to work with its members on these issues. In the current situation, however, solar installers simply do not have the ability to provide customers with uniform, accurate estimates or other guidance on key program parameters that dictate the payback period of on-site generation.

Under these circumstances, ICEA submits that the simplest, most straightforward way to alleviate these concerns is to allow customers to continue under existing Schedule 6 and Schedule 8 until a replacement program is implemented. Not only will this provide a basis for solar installers to provide, and customers to receive, accurate information to inform decision-making; it will also foster the Commission's goal of an open, transparent, and understandable process to implement any changes to the net metering program.

Dated: January 10, 2020.

GIVENS PURSLEY LLP



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CERTIFICATE OF SERVICE

I certify that on January 10, 2020, a true and correct copy of the foregoing comments were served upon all parties of record in this proceeding via the manner indicated below:

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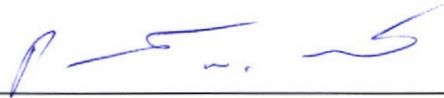
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A handwritten signature in blue ink, appearing to read "P. N. Carter", is written above a horizontal line.

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