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UTILITIES COMMISSION

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

Re: IPC-E-18-15

Ms. Hanian,

Please find enclosed two filings submitted on behalf of the Idaho Conservation League and Vote Solar.

The first filing is ICL and Vote Solar's Reply Comments on the Settlement. I enclosed an original and seven copies of this document.

The second filing is ICL and Vote Solar's Brief on Existing Customers. I enclosed an original and seven copies of this document. This brief includes an attachment with voluminous excel computer files. I included one cd-rom with these files and will upload these same files to the FTP site for this docket established by Idaho Power and used by all parties.

Please contact me with any questions.

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Attorney for the Idaho Conservation League

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF THE</b>	)	<b>CASE NO. IPC-E-18-15</b>
<b>APPLICATION OF IDAHO POWER</b>	)	
<b>COMPANY TO STUDY THE COSTS,</b>	)	<b>IDAHO CONSERVATION LEAGUE</b>
<b>BENEFITS, AND COMPENSATION OF</b>	)	<b>AND</b>
<b>NET EXCESS ENERGY SUPPLIED BY</b>	)	<b>VOTE SOLAR</b>
<b>CUSTOMER ON-SITE GENERATION</b>	)	<b>REPLY COMMENT ON SETTLEMENT</b>

The Idaho Conservation League (“ICL”) and Vote Solar submit the following reply comments on the proposed Settlement Agreement in this docket. ICL and Vote Solar participated in all of the negotiations that lead to this settlement. While we did not support the Settlement, out of respect for the process and other stakeholders we will address our concerns in future proceedings. Here we reply only to the comments on the proposed Settlement filed by the Idaho Irrigation Pumpers Association. On this same day we file a separate brief stating our position on the Commission’s authority to treat existing customer-generators fairly while providing a new program to address the changing landscape for future customer-generators.

The PUC Staff state, “[t]he crux of this Settlement is the move from retail monthly net metering to hourly net billing at the Export Credit Rate, with a bright line at the meter to distinguish imports from exports.” *Staff Comments at 4*. ICL and Vote Solar agree with this statement and note this framework aligns with the Commission Order No. 34046 that set us on this path. That Order segregated customers with on-site generation from those without based on the ability to export to the grid, and not on the customer’s consumption patterns. “To reiterate, we recognize the fundamental difference between, as an example, a residential customer with no on-site generation and one that can both import energy from, and export it to, the Company’s grid using the same infrastructure. This bi-directionality is distinct from a customer purely offsetting its own energy usage outside of the grid.” *Order No. 34046 at 17-18*.

The bright line at the meter concept is embedded into the Settlement joined by the signing parties who agree not to pursue changes to the consumption rates in this docket, rather wait for a proceeding “which the Commission determines whether to change rates or rate design

IPC-E-18-15

ICL and Vote Solar

Reply Comment on Settlement

for all customer classes.” See *Settlement Term I.V.F. at page 4*. On this subject, the Commission has ordered a separate docket, IPC-E-18-16, to consider issues of fixed cost calculation and spread across customer classes. *Order No. 34190, 34466*. Second, a proceeding where the Commission determines whether to change rates of all customers, also known as a General Rate Case, has key evidence in the record – a cost of service study, a revenue requirement, and facts showing current rates as they relate to the total revenue requirement for the Company – and notice to all affected of potential rate changes, none of which is present in this docket. Accordingly, the comments of the Idaho Irrigation Pumpers Association that focus on a solar-customer’s consumption are appropriately studied in docket IPC-E-18-16 and considered in the next general rate case where consumption rates and cost of service are properly notified, documented, and discussed. The Commission should defer consideration of these issues until the appropriate time and forum.

Respectfully submitted this 13<sup>th</sup> day of November 2019,

  
\_\_\_\_\_  
Benjamin J. Otto  
Idaho Conservation League  
Local Council – Vote Solar

## CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of November 2019 I delivered true and correct copies of the foregoing REPLY COMMENT ON THE SETTLEMENT to the following via the method of service noted:

  
Benjamin J. Otto

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