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IDAHO PUBLIC
UTILITIES COMMISSION

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Attorneys for Idaho Clean Energy Association

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION
OF IDAHO POWER COMPANY TO
STUDY THE FIXED COSTS OF
PROVIDING ELECTRIC SERVICE TO
CUSTOMERS

Case No. IPC-E-18-16

**IDAHO CLEAN ENERGY ASSOCIATION,
INC.'S PETITION FOR INTERVENOR
FUNDING**

Idaho Clean Energy Association, Inc. ("ICEA"), by and through its attorneys of record, Givens Pursley LLP, and pursuant to Idaho Code § 61-617A and IDAPA 31.01.01.161 - 165, respectfully applies to the Idaho Public Utilities Commission ("Commission") for intervenor funding. Pursuant to Commission Rule 164, this application is timely, as it is made within fourteen days of the date of the last deadline for submitting comments, which was January 21, 2020.

REQUEST FOR INTERVENOR FUNDING

1. **List of Expenses.** As required by Commission Rule 162.01, attached to the Affidavit of Preston N. Carter, and filed herewith, is an itemized list of expenses ICEA requests to recover.

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2. **Statement of Proposed Findings.** ICEA actively participated in every settlement conference in this case. Without disclosing the contents of confidential settlement discussions, ICEA provided input and the perspective from those involved in the rooftop solar energy, as well as customers who have considered or installed rooftop solar systems. Idaho Power's fixed-cost report acknowledges input from ICEA. ICEA also presented significant comments on the fixed-cost report.

3. **Statement Showing Reasonableness of Costs.** See the accompanying Affidavits of Preston N. Carter and Kevin King.

4. **Explanation of Cost Statement.** See the Affidavit of Kevin King, which explains why the costs described constitute a significant financial hardship for the intervenor.

5. **Statement of Difference.** During settlement discussions, ICEA presented the perspective of businesses involved in the rooftop solar energy, and particularly how different rates and rate designs pose difficulties for solar installers in explaining, and customers in understanding, how those rates and rate designs impact decisions to invest in rooftop solar systems. This perspective is not available to Staff. ICEA also brought to the table the perspective of customers that have installed rooftop solar systems, including how customer behavior may change in response to particular rates or rate design. Finally, ICEA presented written comments that differed from the positions that Staff has presented.

6. **Statement of Recommendation.** ICEA proposed recommendations, contained in its comments, on how the Commission should consider various values associated with rates and rate design rather than focusing primarily upon how rates and rate design matches the Company's mix of fixed and variable costs, as the Company has requested.

7. **Statement Showing Class of Customers.** Present net metering customers are members of Schedule 6 and 8. ICEA's comments and participation, however, address customers more broadly. ICEA's focus on the impacts that rate and rate designs have on customer behavior addresses all customers classes, though it focuses primarily on the residential and small customer service classes.

For these reasons, ICEA respectfully requests that the Commission grant its petition for intervenor funding in the amount of \$8,000, as noted and explained in further detail in the accompanying affidavits.

Dated: February 3, 2020

GIVENS PURSLEY LLP



Preston N. Carter
Givens Pursley LLP
Attorneys for Idaho Clean Energy Association

CERTIFICATE OF SERVICE

I certify that on February 3, 2020, a true and correct copy of ICEA's Petition for Intevenor Funding was served upon all parties of record in this proceeding via the manner indicated below:

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