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IDAHO PUBLIC
UTILITIES COMMISSION

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION TO EVALUATE
SCHEDULE 84 – NET METERING

Case No. IPC-E-19-15

**CITY OF BOISE CITY'S
FORMAL COMMENTS**

COMES NOW, the city of Boise City, herein referred to as “Boise City” and pursuant to that Notice of Application and Notice of Procedural Comment Deadline, Order No. 34315, filed on April 18, 2019, hereby submits its formal written comments in response to the Commission's request for comment to following:

1. Whether and to what extent this Application impacts or is impacted by IPC-E-18-15 and IPC-E-18-16.

Over the last several months, parties to these two dockets (IPC-E-18-15; 16) have met several times for multi-hour negotiations on the scope and nature of these dockets. In IPC-E-18-15, the parties have met to discuss various aspects related to developing direction and outlining

how to conduct a study that will examine the benefits and costs for net excess energy provided by on-site generation customers. In IPC-E-18-16, the parties have conducted several settlement meetings to outline the goals and strategies for examining Idaho Power Company's ("IPC") fixed-cost recovery, rate design options, and attributes that the parties desire to promote in rate design and cost recovery.

Many of the parties to those two dockets are likely to be the same parties involved in this new Application IPC-E-19-15 (the "Application"). Likewise, this Application will certainly involve the same facts and considerations as IPC-E-18-15 as IPC is asking to evaluate the same aspects of large industrial and commercial customers as is currently being evaluated in IPC-E-18-15 related to residential and small general service customer. In addition, it is expected that information obtained in either docket will likely, or should inform, the other. In regard to IPC-E-18-16, the outcome or discoveries in this Application will likely need to be considered in IPC-E-18-16 in order to comprehensively evaluate rate design.

2. Whether and to what extent the issues raised in IPC-E-18-15, IPC-E-16, and this Application can and should be examined holistically.

Specifically, the issues raised in IPC-E-18-15 and this Application appear to be almost identical. Although the size of the on-site generation will be different and there may be other unique aspects of this Application, the overall nature of the items and characteristics that will need to be studied are very similar. Similar to IPC-E-18-15 and IPC-E-18-16, where the subject of these dockets are not expressly related, but are likely to inform one another, the same is true of IPC-E-18-16 and this Application. It is in the interest of all net metering customers to see and consider the same information so that potential impacts of any proposed changes can be clearly articulated

and understood by all parties at the same time. Therefore, these three dockets should be examined holistically. Doing so is in the best interest of efficient use of resources and fairness to potentially impacted rate payers.

3. Whether this docket should be processed according to Idaho Power's proposal on page 8 of the Application.

This Application should not be processed as requested by Idaho Power, including an expeditious consideration of the docket and an immediate suspension of Schedule 84 service to CI&I applicants. Idaho Power has simply asked to suspend Schedule 84 without providing any avenue for these customers to on-site generate for the pendency of this docket. Idaho Power is effectively preventing customers wanting to install on-site generation from being allowed to generate and net meter.

4. Whether the Commission should process this docket by modified procedure or by hearings.

Considering the likelihood of the three dockets (IPC-E-18-15 and IPC-E-18-16, and this Application) being processed holistically, this Application should be conducted in a similar manner as IPC-E-18-15 and IPC-18-16 with a modified procedure, encouraging settlement conferences and collaboration, while reserving the right to conduct a hearing if the parties are unable to reach a consensus.

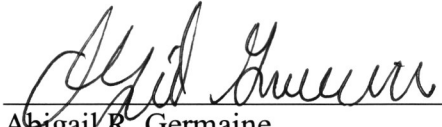
5. Whether the Commission should suspend Schedule 84 for new applicants while IPC-E-19-15 is being processed, and if the Commission does suspend Schedule 84 in the interim, whether the suspension should be from the date of filing – April 5, 2019 – or some other date.

The Commission should not suspend Schedule 84 while this Application is being processed. Boise City agrees with the Commission's Order that IPC has not provided good cause for requiring that Schedule 84 be immediately suspended. Immediate suspension is not appropriate in this case. Furthermore, Schedule 84 should not be suspended, if at all, until the completion of this docket.

6. Whether the Company's proposed effective date of January 1, 2020, in IPC-E-19-15 is feasible.

At this point, it is not appropriate to propose an effective date of January 1, 2020, for this Application. The scope of the docket, the nature of its relationship to IPC-E-18-15 and IPC-E-18-16, and the procedure for this docket need to be determined prior to establishing a timeline. It is unclear from Idaho Power's Application what exactly would be effective on January 1, 2020. Likewise, establishing an effective date prior to determining whether modifications to Schedule 84 are appropriate, or needed, is illogical.

DATED this 23 day of April 2019.


Abigail R. Germaine
Deputy City Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have on this 23 day of April 2019, served the foregoing documents on all parties of counsel as follows:

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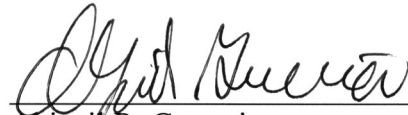
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A handwritten signature in black ink, appearing to read "Abigail R. Germaine", written over a horizontal line.

Abigail R. Germaine
Deputy City Attorney