



# ECHO HAWK & OLSEN

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April 5, 2019

Diane Hanian, Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, Idaho 83720-0074  
[diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

RECEIVED  
2019 APR -8 AM 10:00  
IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: CASE No.: IPC-E-19-15 IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION TO STUDY THE MEASUREMENT  
INTERVAL, COMPENSATION STRUCTURE, AND VALUE OF NET  
EXCESS ENERGY FOR ON-SITE GENERATION UNDER SCHEDULE  
84 AND TO TEMPORARILY SUSPEND SCHEDULE 84 NET METERING  
SERVICE TO NEW IDAHO APPLICANTS**

Dear Ms. Hanian:

Enclosed you will find the original and seven (7) copies of the Petition of Idaho Irrigation Pumpers Associations, Inc. for Leave to Intervene. Electronic copies have been served per the Certificate of Service. Please file the Petition in the case file.

Also enclosed are three copies of Idaho Irrigation Pumpers Associations, Inc.'s letter regarding this case. Please provide these copies to the Commissioners.

If you have any questions, please don't hesitate to call. Thank you.

Sincerely,

Eric L. Olsen

Enclosures H:\WDOX\CLIENTS\1343\0026\DOCX



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2019 APR -8 AM 10:00  
IDAHO PUBLIC  
UTILITIES COMMISSION

*Attorney for Intervenor Idaho Irrigation Pumpers Association, Inc.*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF IDAHO POWER  
COMPANY'S APPLICATION FOR  
AUTHORITY TO STUDY THE  
MEASUREMENT INTERVAL,  
COMPENSATION STRUCTURE, AND  
VALUE OF NET EXCESS ENERGY FOR  
ON-SITE GENERATION UNDER  
SCHEDULE 84 AND TO TEMPORARILY  
SUSPEND SCHEDULE 84 NET METERING  
SERVICE TO NEW IDAHO APPLICANTS**

**CASE NO. IPC-E-19-15**

**PETITION OF IDAHO IRRIGATION  
PUMPERS ASSOCIATION, INC.  
FOR LEAVE TO INTERVENE**

COMES NOW Idaho Irrigation Pumpers Association, Inc. herein called "this Intervenor" and pursuant to Rules 71 through 73 of the Rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene and to appear and participate as a party herein, and as basis therefor states as follows:

- 1) The name and address of Intervenor is:

Idaho Irrigation Pumpers Association, Inc.  
c/o Lynn Tominga  
P.O. Box 2624  
Boise, Idaho, 83701-2624

This Intervenor will be represented by:

Eric L. Olsen  
ECHO HAWK & OLSEN, PLLC  
505 Pershing Ave., Ste. 100  
P.O. Box 6119  
Pocatello, Idaho 83205

and requests that copies of all pleadings and production requests and responses should be provided to the following:

Eric L. Olsen  
ECHO HAWK & OLSEN, PLLC  
505 Pershing Ave., Ste. 100  
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Pocatello, Idaho 83205  
Telephone: (208) 478-1624  
Facsimile: (208) 478-1670  
Email: [elo@echohawk.com](mailto:elo@echohawk.com)

Anthony Yankel  
12700 Lake Avenue, Unit 2505  
Lakewood, Ohio 44107  
Email: [tony@yankel.net](mailto:tony@yankel.net)

2) This Intervenor and its members have a direct and substantial interest in this proceeding and intend to participate in all respects herein as a party as may be required to represent its interests.

3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission grant this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate.

DATED this 5<sup>th</sup> day of April, 2019.

ECHO HAWK & OLSEN



ERIC L. OLSEN



## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5<sup>th</sup> day of April, 2019, I served a true, correct and complete copy of the Petition of Idaho Irrigation Pumpers Association, Inc. for Leave to Intervene to each of the following, via U.S. Mail or private courier, email or hand delivery, as indicated below:

Diane M. Hanian, Secretary

**Idaho Public Utilities Commission**

P.O. Box 83720

472 W. Washington Street

Boise, ID 83720-0074

[diane.holt@puc.idaho.gov](mailto:diane.holt@puc.idaho.gov)

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U.S. Mail

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Hand Delivered

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Overnight Mail

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Telecopy (Fax)

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Electronic Mail (Email)

Lisa D. Nordstrom

Regulatory Dockets

**Attorney for Idaho Power Company**

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Tim Tatum

V.P. of Regulatory Affairs

**Idaho Power Company**

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Anthony Yankel

**Idaho Irrigation Pumpers Association, Inc.**

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Rebecca Berls, Paralegal

Echo Hawk & Olsen

**IDAHO IRRIGATION PUMPERS ASSOCIATION, INC.**

P.O. Box 2624  
Boise, ID 83701-2624

Commissioner Paul Kjellander  
Commissioner Kristine Raper  
Commissioner Eric Anderson  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

**RE: Idaho Power Company Schedule 84/Commercial, Industrial & Irrigation Customers**

Dear Commissioners Kjellander, Raper & Anderson:

The Idaho Irrigation Pumpers Association, Inc. ("IIPA") would like to address a matter that requires the Commission's prompt attention. The IIPA has been actively participating in Idaho Power Company's ("IPC") recent filings involving onsite generation for the residential and small general service customers, e.g., IPC-E-17-13, IPC-E-18-15 & IPC-E-18-16. Note, these cases have not directly addressed these same issues as applicable to Commercial, Industrial and Irrigation customers who want to invest in onsite solar generation.

As costs for onsite solar generation have fallen, Irrigation Customers' interest in lowering their overall irrigation pumping costs through onsite solar generation has dramatically increased. The IIPA is aware of Irrigation customers who have made, or are considering making, significant investments in onsite solar generation based on current Schedule 84. However, IIPA believes that the calculation of the credit for Excess Net Energy under the current Schedule 84 overvalues the credit in light of current and foreseeable electricity prices. This price distortion causes Irrigation customers to make investment decisions based on inaccurate cost recovery assumptions. This distortion also creates an interclass subsidy paid by those Irrigation customers who do not have onsite solar generation to those class members who do.

The IIPA is supportive of renewable onsite generation as an important part of IPC's future distributed generating resources. However, the prices paid for onsite generation must be fair and equitable to all other Irrigation customers. Given the Excess Net Energy credit overvaluation, the IIPA supports IPC's request for the entry of a freeze on new Commercial, Industrial and Irrigation customers under Schedule 84 and for the initiation of a new docket to look at these issues specifically unique to this group of customers. This proposed new docket should be able to utilize the existing good work that has already taken place in the other cases, e.g., IPC-E-18-15 & IPC-E-18-16, and should be targeted to be completed by year's end.

Respectfully,

**Idaho Irrigation Pumpers Association, Inc.**