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IDAHO PUBLIC
UTILITIES COMMISSION

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Lead Counsel
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June 19, 2020

VIA ELECTRONIC FILING

Diane Hanian, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-20-26
In the Matter of Idaho Power Company's Application for Authority to Modify
Schedule 84's Metering Requirement and to Grandfather Existing Customers with
Two Meters.

Dear Ms. Hanian:

Attached for electronic filing in the above matter is Idaho Power Company's
Application in the above matter. Also attached for filing is the Direct Testimony of Connie G.
Aschenbrenner. In lieu of a disc, attached is a Word version of the testimony for the Reporter.

If you have any questions about the enclosed documents, please do not hesitate to
contact me.

Very truly yours,

Lisa D. Nordstrom

LDN:sdh
Enclosures

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	
COMPANY'S APPLICATION FOR)	CASE NO. IPC-E-20-26
AUTHORITY TO MODIFY SCHEDULE)	
84's METERING REQUIREMENT AND TO)	APPLICATION
GRANDFATHER EXISTING CUSTOMERS)	
WITH TWO METERS.)	
_____)	

Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* §§ 61-502, 61-622, RP 052 and 123, respectfully requests the Idaho Public Utilities Commission ("Commission") authorize the Company to modify the metering requirement under Schedule 84, Customer Energy Production Net Metering Service ("Schedule 84") to be effective on December 1, 2020, or another date as ordered by the Commission ("Effective Date"). The requested modification would remove the two-meter requirement for new Schedule 84 customers that begin taking service under Schedule 84 on or after

the Effective Date. The Company further requests that, simultaneous with the implementation of the single-meter requirement, the Commission grandfather existing customers and applicants with two-meter systems under the current one-for-one net metering billing construct provided for in Schedule 84, for a period of no more than 10 years.

I. BACKGROUND

1. Idaho Power is an Idaho corporation whose principal place of business is 1221 West Idaho Street, Boise, Idaho 83702.

2. Idaho Power is a public utility supplying retail electric service to more than 570,000 customers in southern Idaho and eastern Oregon. Idaho Power is subject to the jurisdiction of this Commission in Idaho and to the jurisdiction of the Public Utility Commission of Oregon. Idaho Power is also subject to the jurisdiction of the Federal Energy Regulatory Commission.

3. Schedule 84 is an optional service offered by the Company for customers intending to operate their own generation facilities with a capacity up to 100 kilowatts ("kW") to offset a portion or all their energy usage. Net metering customers may transfer excess electricity to the Company from customer-owned generation facilities.

4. Idaho Power's Schedule 84 has allowed commercial, industrial, and irrigation ("CI&I") customers to connect a generating resource they own or operate to the Company's system to offset all or part of their electric consumption since September 2002.¹ Although residential and small general service ("R&SGS") net metering customers utilize a single utility meter to net both consumption and excess generation, CI&I net

¹ *In the Matter of the Application of Idaho Power Company for Amendments to Schedule 84 – Net Metering*, Case No. IPC-E-02-04, Order No. 29024 (August 21, 2002).

metering customers were required to install a second meter to measure the energy provided by the customer's generating facility. This metering configuration allowed CI&I customers to offset any energy charges with the production from their on-site generation system and enabled collection of demand and basic load capacity charges based on the customer's gross demand, measured independent of the on-site generation.

5. In 2016, the Commission approved a modification in Advice No. 16-05 to allow the second meter to be installed, at the Company's discretion, either adjacent to or on the customer's side of the point of delivery. Because the existing two-meter requirement was cost-prohibitive in some cases, the Company proposed this change to reduce the barriers to participation for primary service-level customers who desire to install on-site generation.

6. In Case No. IPC-E-18-15, the Commission defined grandfathered systems as existing Schedule 6 and Schedule 8 customers under the rules in place as of December 20, 2019. The Commission further ordered four criteria that would apply for grandfathering by system: (1) a customer who moves into a property with a grandfathered on-site generation system will "inherit" the grandfathered status of the system, (2) if a system is offline for longer than six months, or is moved to another site, the grandfathered system is forfeited, (3) to allow for the replacement of degraded or broken panels, the customer may increase the capacity of the grandfathered system by no more than 10 percent of the originally installed nameplate capacity or 1 kW, whichever is greater, and (4) grandfathered status terminates December 20, 2045.²

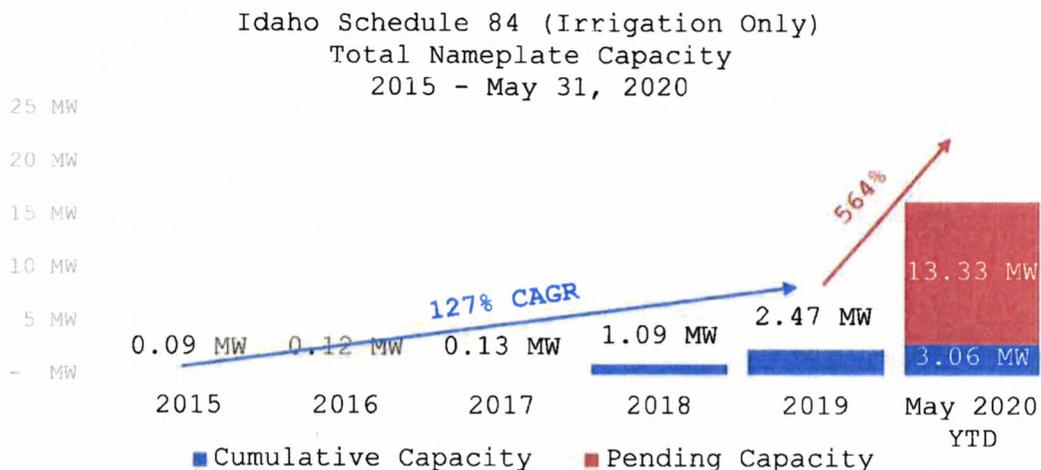
² *In the Matter of the Petition of Idaho Power Company to Study the Costs, Benefits, and Compensation of Net Excess Energy Supplied by Customer On-Site Generation*, Case No. IPC-E-18-15, Order Nos. 34509 (December 20, 2019) and 34546 (February 4, 2020).

II. SCHEDULE 84 GROWTH

7. As of May 31, 2020, participation in Schedule 84 included 165 service points with 6.96 MW of installed generation capacity and an additional 175 service points with 14.85 MW of pending generation capacity, for a total potential for 340 service points with 21.82 MW of Schedule 84 generation capacity.

8. From 2015 through 2019, Schedule 84 has experienced a 49 percent compound annual growth rate ("CAGR") in installed generation capacity. From year-end 2019 through the end of May 2020, there has been a 257 percent increase in active and pending Schedule 84 generation capacity.

9. Recent Schedule 84 growth continues to be primarily driven by the irrigation class, which has experienced a 127 percent CAGR in installed generation capacity from 2015 through 2019, with most of that growth occurring in the last two years. In just the five months between year-end 2019 and the end of May 2020, installed and pending generation capacity in the irrigation class has grown 564 percent, from 2.47 MW to 16.40 MW.



III. MODIFICATIONS TO METERING REQUIREMENT

10. In support of this Application, Idaho Power has filed the Direct Testimony of Rate Design Senior Manager Connie Aschenbrenner. Ms. Aschenbrenner's testimony details the Company's request for the Commission to modify the metering requirement under Schedule 84 from a two-meter to a single-meter requirement for all new Schedule 84 customers as of the Effective Date.

11. Based on feedback received from customers, installers and stakeholders, Idaho Power believes a single meter requirement will reduce incremental costs and complexities resulting from the existing two-meter requirement. Further, modification of the metering requirement and transition to a single-meter requirement will enable the Company to holistically study the value of excess energy for all on-site generation in both the R&SGS and CI&I customer classes. Finally, the Company believes the modification in the metering requirement provides a reasonable distinction for the Commission to rely on as a basis for grandfathering.

12. Attachment 1 to this Application is Idaho Power's proposed IPUC No. 29, Tariff No. 101, in both clean and legislative formats, containing the revised tariff sheets for providing retail electric service to Schedule 84 customers effective December 1, 2020, or another date as ordered by the Commission.

IV. GRANDFATHER EXISTING CUSTOMERS WITH TWO METERS

13. The Company requests that the Commission issue an order establishing existing Schedule 84 customers with two-meter interconnections be grandfathered for a period of no more than 10 years pursuant to the current metering and billing provisions contained in Schedule 84 as of the Effective Date. Under this proposal, all new single-

metered systems would not be grandfathered, and therefore would be subject to any future changes to the billing and compensation structure provided under Schedule 84, or a successor tariff offering, ordered by the Commission.

14. As described in Ms. Aschenbrenner's Direct Testimony, the Company proposes defining an existing customer as a person or business who either has an approved two-meter on-site generation system interconnected with Idaho Power's system before the Effective Date or who has submitted an application to install a two-meter on-site generation system as of the Effective Date ordered by the Commission. A customer that has applied for the Company's net metering service before the Commission's ordered Effective Date would be required to proceed to interconnect their system within one year of their date of application.³ Further, any customer that submitted an application after the service date of this Application would be required to provide proof to the Company that a financial investment in a two-meter system was made before the Commission's ordered Effective Date.

15. Idaho Power proposes the following criteria apply to grandfathered systems in Schedule 84: (1) a customer who moves into a property with a grandfathered on-site generation system "inherits" the grandfathered status of the system, (2) if a system is offline for longer than six months, or is moved to another site, the grandfathered system is forfeited, (3) to allow for the replacement of degraded or broken panels, for applications received before May 1, 2020⁴, the customer may increase the capacity of the

³ Schedule 72 provides that "applications that are not completed within one year of the initial Feasibility Review are considered expired."

⁴ As of May 1, 2020, solar on-site generation capacity has been evaluated in terms of the inverter size (AC), not the panel size (DC), for the Feasibility review. Therefore, changes to panel size do not directly impact the nameplate capacity of the inverter for systems evaluated on or after May 1, 2020.

grandfathered system by no more than 10 percent of the originally installed nameplate capacity or 1 kW, whichever is greater, (4) grandfathered status terminates 10 years from the Commission Order date, and (5) a customer who modifies their system from a two-meter interconnection to a single-meter interconnection will forfeit their grandfathering status.

16. The Company also recommends that any Schedule 8 Small General Service On-site Generation customer who was grandfathered by the Commission in Order Nos. 34509 and 34546 would maintain grandfathering status as prescribed by the Commission in those orders if they later exceed the energy requirements of Schedule 8 and are moved to Schedule 9 Large General Service and take service under Schedule 84.

17. If an on-site generation customer taking service under Schedule 84 requests to expand their system on or after the Effective Date, the customer would have two choices: (1) the existing grandfathered system would remain behind the second customer generation meter, and the new system would be placed behind the load meter, or (2) the existing and new systems could be combined, following the customer generation rules in place at the time, and placed behind a single meter with the load.

V. COMMUNICATIONS AND SERVICE OF PLEADINGS

18. Idaho Power will notify all CI&I customers, regardless of whether they have on-site generation installed, of the changes proposed to Schedule 84. Attachment 2 to this Application contains a draft of the letter that will be sent to existing and pending customers.

19. The Company will also send bill inserts to all CI&I customers to make them aware of the Company's proposal and the opportunity for public review. Attachment 3 to the Application includes a copy of the bill insert that will be sent to customers with their bills.

20. Idaho Power will notify the installer community through an email to the distribution list for its periodic publication, the Customer Generation Newsletter. A copy of the notification that will be sent to installers can be found in Attachment 4 to the Application.

21. Idaho Power has also served a copy of this Application and Ms. Aschenbrenner's Direct Testimony on the parties of record in its previous CI&I on-site generation docket, Case No. IPC-E-19-15.

22. The Company has, concurrent with this filing, updated its website to notify potential customers of the proposal; the Company will maintain a list of Frequently Asked Questions ("FAQs") that will remain accessible to existing and potential customers, as well as installers. The Company also intends to notify Schedule 84 applicants and their designated installer of the changes proposed in this Application when the Company sends the application confirmation email.

23. Communications and service of pleadings with reference to this Application should be sent to the following:

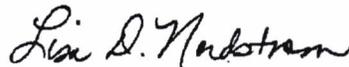
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VI. REQUEST FOR RELIEF

24. As discussed in greater detail above and in Ms. Aschenbrenner's Direct Testimony, Idaho Power respectfully requests the Commission authorize the Company to remove the two-meter requirement for new Schedule 84 customers that begin taking service under Schedule 84 effective December 1, 2020, or another date as ordered by the Commission. The Company further requests that, simultaneous with the implementation of the single-meter requirement, the Commission grandfather existing customers and applicants with two-meter systems under the current one-for-one net metering billing construct provided for in Schedule 84, for a period of no more than 10 years.

DATED at Boise, Idaho, this 19th day of June 2020.



LISA D. NORDSTROM
Attorney for Idaho Power Company

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-20-26**

IDAHO POWER COMPANY

**ATTACHMENT 1
PROPOSED TARIFF
(clean and legislative formats)**

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE

AVAILABILITY

Service under this schedule is available throughout the Company's service territory within the State of Idaho for Customers intending to operate Net Metering Systems to generate electricity to reduce all or part of their monthly energy usage.

Effective June 1, 2018, Schedule 84 is closed to service for Idaho residential and Idaho small general service customers.

APPLICABILITY

Service under this schedule is applicable to any Customer that:

1. Does not take service under Schedule 4 or Schedule 5; and
2. Owns and/or operates a Generation Facility fueled by solar, wind, biomass, geothermal, or hydropower, or represents fuel cell technology; and
3. Maintains its retail electric service account for the loads served at the Point of Delivery adjacent to the Generation Interconnection Point as active and in good standing; and
4. Meets all requirements applicable to Net Metering Systems detailed in the Company's Schedule 72 Interconnections to Non-Utility Generation; and
5. Takes retail electric service under:
 - a. Schedule 1 or Schedule 7; and

Owns and/or operates a Generation Facility with a total nameplate capacity rating of 25 kilowatts (kW) or smaller that is interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through the Company's existing watt-hour retail meter.

- b. Schedules other than Schedule 1, Schedule 4, Schedule 5, or Schedule 7; and
 - i. Two-Meter Interconnection (Closed to new applicants effective December 1, 2020): Owns and/or operates a Generation Facility with a total nameplate capacity rating of 100 kW or smaller that is interconnected at a Generation Interconnection Point that, at the Company's discretion, is located either adjacent to or on the Customer's side of the Point of Delivery and is metered through a meter that is separate from the retail load metering at the Customer's Point of Delivery. A separate meter from the existing retail load metering at the Customer's Point of Delivery is not required if the Customer meets the criteria below. The One Meter Option is available if:

1. The Generation Facility has a total nameplate capacity rating of 25 kW or smaller; and

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

APPLICABILITY (Continued)

2. The Generation Facility has a total nameplate capacity rating that is no more than 2% of the Customer's Basic Load Capacity (BLC) or comparable average maximum monthly Billing Demands.

ii. Single-Meter Interconnection (applicable to new applicants effective December 1, 2020): Owns and/or operates a Generation Facility with a total nameplate rating of 100 kW or smaller that is interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through the Company's existing watt-hour retail meter.

DEFINITIONS

Basic Load Capacity (BLC) is the average of the two greatest non-zero monthly Billing Demands established during the 12-month period which includes and ends with the current Billing Period.

Designated Meter is the retail meter physically connected to the Net Metering System.

Excess Net Energy means the positive difference between the kilowatt-hours (kWh) generated by a Customer and the kWh supplied by the Company over the applicable Billing Period.

Generation Facility means all equipment used to generate electric energy where the resulting energy is either delivered to the Company via a single meter at the Point of Delivery or Generation Interconnection Point, or is consumed by the Customer.

Generation Interconnection Point is the point where the conductors installed to allow receipt of the Customer's generation connect to the Company's facilities adjacent to the Customer's Point of Delivery.

Interconnection Facilities are all facilities reasonably required by Prudent Electrical Practices and the applicable electric and safety codes to interconnect and safely deliver energy from the Generation Facility to the Point of Delivery or Generation Interconnection Point.

Net Metering Service is the Company's service that provides for transfer of electric energy to the Company by means of a net metering arrangement under the terms of Schedule 84 or its successor schedule(s) as approved by the Commission. This optional service provides for Customers to install Generation Facilities to interconnect to the Company's system to offset all or a portion of their electrical usage. This service is comprised of all Customers taking service under Schedule 84.

Net Metering System is a Customer-owned Generation Facility interconnected to the Company's system under the applicable terms of Schedule 72 and Schedule 84.

Point of Delivery is the retail metering point where the Company's and the Customer's electrical facilities are interconnected to allow the Customer to take retail electric service from the Company.

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

DEFINITIONS (Continued)

Prudent Electrical Practices are those practices, methods and equipment that are commonly used in prudent electrical engineering and operations to operate electric equipment lawfully and with safety, dependability, efficiency and economy.

Schedule 72 is the Company's service schedule which provides for interconnection to non-utility generation or its successor schedule(s) as approved by the Commission.

MONTHLY BILLING

The Customer shall be billed in accordance with the Customer's applicable standard service schedule, including appropriate monthly charges.

CONDITIONS OF PURCHASE AND SALE

The conditions listed below shall apply to all transactions under this schedule.

1. Balances of generation and usage by the Customer:

a. If electricity supplied by the Company during the Billing Period exceeds the electricity generated by the Customer and delivered to the Company during the Billing Period, the Customer shall be billed for the net electricity supplied by the Company at the Customer's standard schedule retail rate, in accordance with normal metering practices.

b. Effective at the beginning of each Customer's January 2014 Billing Period, if electricity generated by the Customer and delivered to the Company during the Billing Period exceeds the electricity supplied by the Company during the Billing Period, the Excess Net Energy shall be carried forward as a kWh credit to offset energy usage in a subsequent Billing Period. Excess Net Energy credits are subject to the following provisions:

i. Credits can only be used to offset billed kWh consumption. Customers shall be billed for all applicable non-energy charges for the Billing Period according to the applicable standard service schedule.

ii. Credits shall carry forward provided the Customer maintains electric service at the same Point of Delivery.

iii. Credits are non-transferrable in the event that a Customer relocates and/or discontinues service at the Point of Delivery associated with the Net Metering System. Any unused credits will expire at the time the final bill is prepared.

2. Aggregation of meters for the annual transfer of unused Excess Net Energy credits:

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

CONDITIONS OF PURCHASE AND SALE (Continued)

a. If a balance of Excess Net Energy credits exists at a Designated Meter at the end of the Customer's December Billing Period the Customer may request to transfer the unused credits to offset energy consumption at eligible meters. A meter is eligible for aggregation if it meets all of the following criteria:

i. The account subject to offset is held by the Customer; and

ii. The meter is located on, or contiguous to, the property on which the Designated Meter is located. For the purposes of this tariff, contiguous property includes property that is separated from the Premises of the Designated Meter by public or railroad rights of way; and

iii. The meter is served by the same primary feeder as the Designated Meter at the time the Customer files the application for the Net Metering System; and

iv. The electricity recorded by the meter is for the Customer's requirements; and

v. For Customers taking service under Schedule 1 or Schedule 7, credits may only be transferred to meters taking service under Schedule 1 or Schedule 7. For Customers taking service under Schedule 9, Schedule 19, or Schedule 24, credits may only be transferred to meters taking service under Schedule 9, Schedule 19, or Schedule 24.

b. Customers may submit requests to transfer Excess Net Energy credits between January 1 and January 31 of each year. All requests must be received by Idaho Power by midnight, Mountain Standard Time, on January 31. If a Customer does not request to transfer Excess Net Energy credits by the January 31 submission deadline Excess Net Energy credits will carry forward to offset consumption at the Designated Meter until they become eligible for transfer on January 1 of the following year.

c. Requests to transfer Excess Net Energy credits must be executed by the Company no later than March 31. Transfers will be based on the balance of Excess Net Energy credits available at the time the transfer is made.

d. If multiple meters are eligible for aggregation, Excess Net Energy credits must first be applied to the Designated Meter, then to eligible meters on the same rate schedule as the Designated Meter. Remaining Excess Net Energy credits may then be applied to offset consumption at eligible meters on differing rate schedules in accordance with Section 2a(v) above.

e. A meter aggregation fee of \$10.00 will be assessed per aggregated meter per annual transfer transaction.

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

CONDITIONS OF PURCHASE AND SALE (Continued)

3. The Customer shall never deliver or attempt to deliver energy to the Company's system when the Company's system serving the Customer's Generation Facility is de-energized for any reason.

4. The Company shall not be liable directly or indirectly for permitting or continuing to allow an attachment of a Net Metering System to the Company's system, or for the acts or omissions of the Customer that cause loss or injury, including death, to any third party.

5. The Customer is responsible for all costs associated with the Generation Facility and Interconnection Facilities. The Customer is also responsible for all costs associated with any Company additions, modifications, or upgrades to any Company facilities that the Company determines are necessary as a result of the installation of the Generation Facility in order to maintain a safe, reliable electrical system.

6. The Company shall not be obligated to accept, and the Company may require the Customer to curtail, interrupt or reduce deliveries of energy if the Company, consistent with Prudent Electrical Practices, determines that curtailment, interruption or reduction is necessary because of line construction or maintenance requirements, emergencies, or other critical operating conditions on its system.

7. If the Company is required by the Commission to institute curtailment of deliveries of electricity to its customers, the Company may require the Customer to curtail its consumption of electricity in the same manner and to the same degree as other Customers on the Company's standard service schedules.

8. The Customer shall grant to the Company all access to all Company equipment and facilities including adequate and continuing access rights to the property of the Customer for the purpose of installation, operation, maintenance, replacement or any other service required of said equipment as well as all necessary access for inspection, switching and any other operational requirements of the Customer's Interconnection Facilities.

9. The Customer shall notify the Company immediately if a Net Metering System is permanently removed or disabled. Permanent removal or disablement for the purposes of this schedule is any removal or disablement of a Net Metering System lasting longer than six (6) months. Customers with permanently removed systems will be removed from service under this schedule and placed on the appropriate standard service schedule.

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE

AVAILABILITY

Service under this schedule is available throughout the Company's service territory within the State of Idaho for Customers intending to operate Net Metering Systems to generate electricity to reduce all or part of their monthly energy usage.

Effective June 1, 2018, Schedule 84 is closed to service for Idaho residential and Idaho small general service customers.

APPLICABILITY

Service under this schedule is applicable to any Customer that:

1. Does not take service under Schedule 4 or Schedule 5; and
2. Owns and/or operates a Generation Facility fueled by solar, wind, biomass, geothermal, or hydropower, or represents fuel cell technology; and
3. Maintains its retail electric service account for the loads served at the Point of Delivery adjacent to the Generation Interconnection Point as active and in good standing; and
4. Meets all requirements applicable to Net Metering Systems detailed in the Company's Schedule 72 Interconnections to Non-Utility Generation; and

5. Takes retail electric service under:

- a. Schedule 1 or Schedule 7; and

Owns and/or operates a Generation Facility with a total nameplate capacity rating of 25 kilowatts (kW) or smaller that is interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through the Company's existing watt-hour retail meter.

- b. Schedules other than Schedule 1, Schedule 4, Schedule 5, or Schedule 7; and

1. Two-Meter Interconnection (Closed to new applicants effective December 1, 2020): Owns and/or operates a Generation Facility with a total nameplate capacity rating of 100 kW or smaller that is interconnected at a Generation Interconnection Point that, at the Company's discretion, is located either adjacent to or on the Customer's side of the Point of Delivery and is metered through a meter that is separate from the retail load metering at the Customer's Point of Delivery. A separate meter from the existing retail load metering at the Customer's Point of Delivery is not required if the Customer meets the criteria below. The One Meter Option is available if:

1. The Generation Facility has a total nameplate capacity rating of 25 kW or smaller; and

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

APPLICABILITY (Continued)

2. The Generation Facility has a total nameplate capacity rating that is no more than 2% of the Customer's Basic Load Capacity (BLC) or comparable average maximum monthly Billing Demands.

ii. Single-Meter Interconnection (applicable to new applicants effective December 1, 2020): Owns and/or operates a Generation Facility with a total nameplate rating of 100 kW or smaller that is interconnected to the Customer's individual electric system on the Customer's side of the Point of Delivery, thus all energy received and delivered by the Company is through the Company's existing watt-hour retail meter.

DEFINITIONS

Basic Load Capacity (BLC) is the average of the two greatest non-zero monthly Billing Demands established during the 12-month period which includes and ends with the current Billing Period.

Designated Meter is the retail meter physically connected to the Net Metering System.

Excess Net Energy means the positive difference between the kilowatt-hours (kWh) generated by a Customer and the kWh supplied by the Company over the applicable Billing Period.

Generation Facility means all equipment used to generate electric energy where the resulting energy is either delivered to the Company via a single meter at the Point of Delivery or Generation Interconnection Point, or is consumed by the Customer.

Generation Interconnection Point is the point where the conductors installed to allow receipt of the Customer's generation connect to the Company's facilities adjacent to the Customer's Point of Delivery.

Interconnection Facilities are all facilities reasonably required by Prudent Electrical Practices and the applicable electric and safety codes to interconnect and safely deliver energy from the Generation Facility to the Point of Delivery or Generation Interconnection Point.

Net Metering Service is the Company's service that provides for transfer of electric energy to the Company by means of a net metering arrangement under the terms of Schedule 84 or its successor schedule(s) as approved by the Commission. This optional service provides for Customers to install Generation Facilities to interconnect to the Company's system to offset all or a portion of their electrical usage. This service is comprised of all Customers taking service under Schedule 84.

Net Metering System is a Customer-owned Generation Facility interconnected to the Company's system under the applicable terms of Schedule 72 and Schedule 84.

Point of Delivery is the retail metering point where the Company's and the Customer's electrical facilities are interconnected to allow the Customer to take retail electric service from the Company.

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

DEFINITIONS (Continued)

Prudent Electrical Practices are those practices, methods and equipment that are commonly used in prudent electrical engineering and operations to operate electric equipment lawfully and with safety, dependability, efficiency and economy.

Schedule 72 is the Company's service schedule which provides for interconnection to non-utility generation or its successor schedule(s) as approved by the Commission.

MONTHLY BILLING

The Customer shall be billed in accordance with the Customer's applicable standard service schedule, including appropriate monthly charges.

CONDITIONS OF PURCHASE AND SALE

The conditions listed below shall apply to all transactions under this schedule.

1. Balances of generation and usage by the Customer:

a. If electricity supplied by the Company during the Billing Period exceeds the electricity generated by the Customer and delivered to the Company during the Billing Period, the Customer shall be billed for the net electricity supplied by the Company at the Customer's standard schedule retail rate, in accordance with normal metering practices.

b. Effective at the beginning of each Customer's January 2014 Billing Period, if electricity generated by the Customer and delivered to the Company during the Billing Period exceeds the electricity supplied by the Company during the Billing Period, the Excess Net Energy shall be carried forward as a kWh credit to offset energy usage in a subsequent Billing Period. Excess Net Energy credits are subject to the following provisions:

i. Credits can only be used to offset billed kWh consumption. Customers shall be billed for all applicable non-energy charges for the Billing Period according to the applicable standard service schedule.

ii. Credits shall carry forward provided the Customer maintains electric service at the same Point of Delivery.

iii. Credits are non-transferrable in the event that a Customer relocates and/or discontinues service at the Point of Delivery associated with the Net Metering System. Any unused credits will expire at the time the final bill is prepared.

2. Aggregation of meters for the annual transfer of unused Excess Net Energy credits:

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

CONDITIONS OF PURCHASE AND SALE (Continued)

a. If a balance of Excess Net Energy credits exists at a Designated Meter at the end of the Customer's December Billing Period the Customer may request to transfer the unused credits to offset energy consumption at eligible meters. A meter is eligible for aggregation if it meets all of the following criteria:

i. The account subject to offset is held by the Customer; and

ii. The meter is located on, or contiguous to, the property on which the Designated Meter is located. For the purposes of this tariff, contiguous property includes property that is separated from the Premises of the Designated Meter by public or railroad rights of way; and

iii. The meter is served by the same primary feeder as the Designated Meter at the time the Customer files the application for the Net Metering System; and

iv. The electricity recorded by the meter is for the Customer's requirements; and

v. For Customers taking service under Schedule 1 or Schedule 7, credits may only be transferred to meters taking service under Schedule 1 or Schedule 7. For Customers taking service under Schedule 9, Schedule 19, or Schedule 24, credits may only be transferred to meters taking service under Schedule 9, Schedule 19, or Schedule 24.

b. Customers may submit requests to transfer Excess Net Energy credits between January 1 and January 31 of each year. All requests must be received by Idaho Power by midnight, Mountain Standard Time, on January 31. If a Customer does not request to transfer Excess Net Energy credits by the January 31 submission deadline Excess Net Energy credits will carry forward to offset consumption at the Designated Meter until they become eligible for transfer on January 1 of the following year.

c. Requests to transfer Excess Net Energy credits must be executed by the Company no later than March 31. Transfers will be based on the balance of Excess Net Energy credits available at the time the transfer is made.

d. If multiple meters are eligible for aggregation, Excess Net Energy credits must first be applied to the Designated Meter, then to eligible meters on the same rate schedule as the Designated Meter. Remaining Excess Net Energy credits may then be applied to offset consumption at eligible meters on differing rate schedules in accordance with Section 2a(v) above.

e. A meter aggregation fee of \$10.00 will be assessed per aggregated meter per annual transfer transaction.

SCHEDULE 84
CUSTOMER ENERGY PRODUCTION
NET METERING SERVICE
(Continued)

CONDITIONS OF PURCHASE AND SALE (Continued)

3. The Customer shall never deliver or attempt to deliver energy to the Company's system when the Company's system serving the Customer's Generation Facility is de-energized for any reason.

4. The Company shall not be liable directly or indirectly for permitting or continuing to allow an attachment of a Net Metering System to the Company's system, or for the acts or omissions of the Customer that cause loss or injury, including death, to any third party.

5. The Customer is responsible for all costs associated with the Generation Facility and Interconnection Facilities. The Customer is also responsible for all costs associated with any Company additions, modifications, or upgrades to any Company facilities that the Company determines are necessary as a result of the installation of the Generation Facility in order to maintain a safe, reliable electrical system.

6. The Company shall not be obligated to accept, and the Company may require the Customer to curtail, interrupt or reduce deliveries of energy if the Company, consistent with Prudent Electrical Practices, determines that curtailment, interruption or reduction is necessary because of line construction or maintenance requirements, emergencies, or other critical operating conditions on its system.

7. If the Company is required by the Commission to institute curtailment of deliveries of electricity to its customers, the Company may require the Customer to curtail its consumption of electricity in the same manner and to the same degree as other Customers on the Company's standard service schedules.

8. The Customer shall grant to the Company all access to all Company equipment and facilities including adequate and continuing access rights to the property of the Customer for the purpose of installation, operation, maintenance, replacement or any other service required of said equipment as well as all necessary access for inspection, switching and any other operational requirements of the Customer's Interconnection Facilities.

9. The Customer shall notify the Company immediately if a Net Metering System is permanently removed or disabled. Permanent removal or disablement for the purposes of this schedule is any removal or disablement of a Net Metering System lasting longer than six (6) months. Customers with permanently removed systems will be removed from service under this schedule and placed on the appropriate standard service schedule.

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-20-26**

IDAHO POWER COMPANY

**ATTACHMENT 2
CUSTOMER LETTER**



Date

Name

Address

City, State Zip

Subject: Customer Generation Update

Dear **NAME**:

As a valued customer with an investment in renewable energy, we want to keep you informed of a request made by Idaho Power to 1) grandfather your system under the current compensation structure, and 2) move to a single-meter system for new on-site generation customers.

On June 19, 2020, Idaho Power submitted a request to the Idaho Public Utilities Commission (IPUC) asking for these two changes to Schedule 84 (Customer Energy Production Net Metering Service). If approved by the IPUC, these changes would apply to large commercial (i.e., large general service), industrial and irrigation (CI&I) customers with net metering service under Schedule 84.

We recognize the investment customers like you have made when purchasing a renewable energy generation system, so we've asked the IPUC to grandfather existing CI&I on-site generation customers for 10 years under the current compensation structure. We also requested to grandfather customers who have applied to connect a new customer generation system but have not yet completed interconnection.

V 1. As a current on-site generation customer, you would be grandfathered if this proposal is approved.

V 2. As a customer with an active on-site generation application, you would be grandfathered if this proposal is approved and if you complete the two-meter design interconnection process before the application expiration **date**.

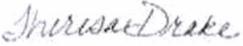
Idaho Power also asked the IPUC to modify the metering requirement in Schedule 84 for new CI&I customers. The requested modification would remove the two-meter requirement for new (non-grandfathered) Schedule 84 customers, which will simplify the interconnection process moving forward. Grandfathered customers would remain interconnected under the two-meter design.

V2: If you would prefer to interconnect your system with the proposed single-meter standard, we have requested an effective date of December 1, 2020, or as otherwise ordered by the IPUC. Single-meter interconnections would not be eligible for grandfathering.

We will keep you updated on the IPUC's decision regarding these two requests as well as any future proposed changes. Idaho Power, along with other stakeholders, will continue to evaluate on-site generation and may propose additional changes in future filings. Idaho Power supports clean energy and customer choice. We remain committed to providing all customers with reliable energy at affordable prices.

For more information, please visit our website at idahopower.com/customergeneration or contact our customer solutions advisors at 1-800-632-6605. We appreciate the opportunity to serve you.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Drake".

Theresa Drake
Senior Manager, Customer Relations and Energy Efficiency

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-20-26**

IDAHO POWER COMPANY

ATTACHMENT 3

BILL INSERT

IMPORTANT NOTIFICATION

for Commercial, Industrial and Irrigation Customers Considering On-site Generation

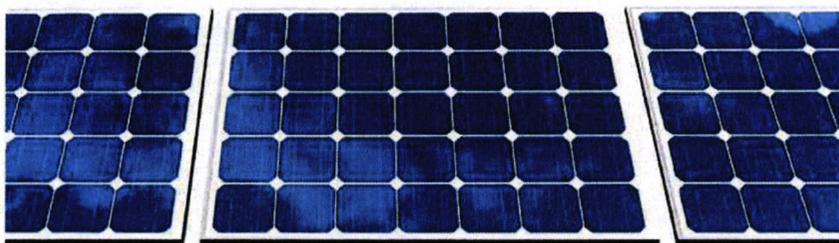
Idaho Power is requesting changes to its net metering service that, if approved, will affect commercial, industrial and irrigation (Schedule 84) customers with solar and other on-site generation systems. Idaho Power's proposal, which has been filed with the Idaho Public Utilities Commission (IPUC), asks to:

- Grandfather existing customers under the current compensation structure. We are also requesting to grandfather customers who have applied to connect a new customer generation system.
- Modify metering requirements for future customers who install on-site generation, including solar. The modification would remove the two-meter requirement for new Schedule 84 customers, simplifying the interconnection process moving forward. Grandfathered customers would remain interconnected under the two-meter design.

Our proposal is under consideration by the IPUC.

For more information on the case, visit puc.idaho.gov and reference Case No. IPC-E-20-26.

If you are thinking about installing on-site generation, visit our website or contact our Customer Solutions Advisors at 1-800-632-6605.



[idahopower.com/
customergeneration](http://idahopower.com/customergeneration)

31180-1-0098

**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION
CASE NO. IPC-E-20-26**

IDAHO POWER COMPANY

**ATTACHMENT 4
INSTALLER EMAIL NOTICE**



Date

To: Installer Email

CC: Customer Generation

Subject: Customer Generation Update

Hello,

We are writing to keep the installer community informed of a request made by Idaho Power to 1) grandfather all existing Schedule 84 systems under the current compensation structure, and 2) move to a single-meter system for new Schedule 84 on-site generation customers.

On June 19, 2020, Idaho Power submitted a request to the Idaho Public Utilities Commission (IPUC) asking for these two changes to Schedule 84 (Customer Energy Production Net Metering Service). If approved by the IPUC, these changes would apply to large commercial (i.e., large general service), industrial and irrigation (CI&I) customers with net metering service under Schedule 84.

We recognize the investment customers made when purchasing a renewable energy generation system, so we've asked the IPUC to grandfather existing CI&I on-site generation customers for 10 years under the current compensation structure. If this proposal is approved, the following CI&I customers would be eligible for grandfathering:

- Customers currently taking service under Schedule 84 as of December 1, 2020; or
- Customers with an active application to take service under Schedule 84 as of June 19, 2020, that complete the interconnection process by the application expiration date; or
- Customers who make a binding financial commitment and submit a customer generation application after June 19, 2020, and before December 1, 2020. Projects must complete the interconnection process by the application expiration date, and proof of financial commitment will be required.

Idaho Power also asked the IPUC to modify the metering requirement in Schedule 84 for new (non-grandfathered) CI&I customers. The requested modification would remove the two-meter requirement for new Schedule 84 customers, which will simplify the interconnection process moving forward. The proposed effective date for the single-meter standard is December 1, 2020. Grandfathered customers would remain interconnected under the two-meter design.

We will keep you updated on the IPUC's decision regarding these requests as well as any future proposed changes. Idaho Power, along with other stakeholders, will continue to evaluate on-site generation and may propose additional changes in future filings. Idaho Power supports clean energy and customer choice. We remain committed to providing all customers with reliable energy at affordable prices.

For more information, please visit our website at idahopower.com/customergeneration or contact our Customer Generation Team at 208-388-2559.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Drake".

Theresa Drake
Senior Manager, Customer Relations and Energy Efficiency

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of June 2020 I served a true and correct copy of the within and foregoing APPLICATION upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Edward Jewell
Deputy Attorney General
Idaho Public Utilities Commission
11331 West Chinden Blvd., Building 8
Suite 201-A
Boise, Idaho 83714

Hand Delivered
 U.S. Mail
 Overnight Mail
 FAX
 Email edward.jewell@puc.idaho.gov

Idaho Irrigation Pumpers Association, Inc.

Eric L. Olsen
ECHO HAWK & OLSEN, PLLC
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Idaho Conservation League and Vote Solar

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Vote Solar

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Deputy City Attorney
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Michael Heckler
Idaho Sierra Club
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Individual

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29393 Davis Road
Bruneau, Idaho 83604

Industrial Customers of Idaho Power

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Dr. Don Reading
6070 Hill Road
Boise, Idaho 83703

IdaHydro

C. Tom Arkoosh
ARKOOSH LAW OFFICES
802 West Bannock Street, Suite LP 103
P.O. Box 2900
Boise, Idaho 83701

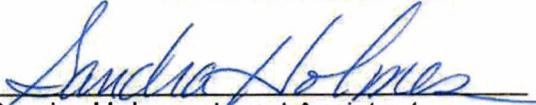
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Sandra Holmes, Legal Assistant