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IDAHO PUBLIC
UTILITIES COMMISSION

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)
GRANDFATHER EXISTING CUSTOMERS)
WITH TWO METERS)

IDAHO POWER COMPANY

DIRECT TESTIMONY

OF

CONNIE G. ASCHENBRENNER

1 Q. Please state your name, business address, and
2 present position with Idaho Power Company ("Idaho Power" or
3 "Company").

4 A. My name is Connie G. Aschenbrenner. My
5 business address is 1221 West Idaho Street, Boise, Idaho
6 83702. I am employed by Idaho Power as the Rate Design
7 Senior Manager in the Regulatory Affairs Department.

8 Q. Please describe your educational background.

9 A. In May of 2006, I received a Bachelor of
10 Business Administration degree in Finance from Boise State
11 University in Boise, Idaho. In December of 2011, I earned
12 a Master of Business Administration degree from Boise State
13 University. In addition, I have attended the electric
14 utility ratemaking course The Basics: Practical Regulatory
15 Training for the Electric Industry, a course offered
16 through New Mexico State University's Center for Public
17 Utilities.

18 Q. Please describe your work experience with
19 Idaho Power.

20 A. In 2012, I was hired as a Regulatory Analyst
21 in the Company's Regulatory Affairs Department. My primary
22 responsibilities included support of the Company's
23 Commercial and Industrial customer class's rate design and
24 general support of tariff rules and regulations. In 2015,
25 I assumed responsibilities associated with Residential and

1 Small General Service rate design, as well as regulatory
2 support associated with demand-side management ("DSM")
3 activities. In 2016, I was promoted to a Senior Regulatory
4 Analyst, and my responsibilities expanded to include the
5 development of complex cost-related studies. In 2017, I
6 was promoted to Rate Design Manager for Idaho Power, and in
7 2019 I was promoted to my current role as Rate Design
8 Senior Manager. I am currently responsible for the
9 management of the rate design strategies of the Company, as
10 well as oversight of all tariff administration. In my
11 current role, I am one of the Company representatives at
12 its Energy Efficiency Advisory Group ("EEAG") meetings.

13 Q. What is the Company's request in this docket?

14 A. With this case, the Company requests that the
15 Idaho Public Utilities Commission ("Commission") authorize
16 the Company to modify the metering requirement under
17 Schedule 84, Customer Energy Production Net Metering
18 Service ("Schedule 84") to be effective on December 1,
19 2020, or another date as ordered by the Commission
20 ("Effective Date"). The requested modification would
21 remove the two-meter requirement for new Schedule 84
22 customers that begin taking service under Schedule 84 on or
23 after the Effective Date. The Company further requests
24 that, simultaneous with the implementation of the single-
25 meter requirement, the Commission grandfather existing

1 customers and applicants with two-meter systems under the
2 current one-for-one net metering billing construct provided
3 for in Schedule 84, for a period of no more than 10 years.

4 Q. How is your testimony organized?

5 A. The first section of my testimony will discuss
6 pertinent history related to Schedule 84 that is currently
7 applicable to Schedule 84 net metering customers. In the
8 second section, I will describe recent and potential future
9 growth in Schedule 84. The third section of my testimony
10 will outline the Company's request for the Commission to
11 modify the metering requirement for new Schedule 84
12 customers and to grandfather existing Schedule 84
13 customers. The concluding section will describe the
14 Company's efforts related to customer notice.

15 **I. History of Schedule 84**

16 Q. Please describe the Company's net metering
17 service offered under Schedule 84.

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

1 Q. When was Idaho Power's Schedule 84 initially
2 made available to commercial, industrial, and irrigation
3 customers?

4 A. By way of compliance with Commission Order No.
5 28951, the Company filed an application in Case No. IPC-E-
6 02-04 presenting a net metering proposal for the Company's
7 commercial, industrial, and irrigation ("CI&I") customers.
8 The Company requested approval of amendments to its
9 existing Schedule 84 that: (1) allowed customers receiving
10 retail service under schedules other than Schedule 1 or
11 Schedule 7 to connect a generating resource they own or
12 operate to the Company's system to offset all or part of
13 their electric consumption by means of a financial credit
14 on their billing, (2) allowed the Company to continue to
15 charge the CI&I net metering customer with a demand
16 component in its retail rates for the electrical demand
17 their load places on Idaho Power's system, (3) did not
18 impose any monthly charges other than those provided for in
19 the Company's standard service schedule applicable to the
20 net metering customer, (4) credited all energy provided in
21 excess of the customer's consumption at a price that does
22 not result in a subsidy from other customers, (5) permitted
23 generating projects with a capacity up to 100 kW to
24 interconnect to the Company's system in a safe and reliable

1 manner, and (6) provided for broad-based access to
2 customers to participate in net metering.

3 Q. What differences related to interconnection
4 and metering requirements were proposed in Case No. IPC-E-
5 02-04 for CI&I net metering customers compared to
6 residential and small general service net metering
7 customers?

8 A. Residential and small general service
9 ("R&SGS") net metering customers utilized a single utility
10 meter to net both consumption and excess generation. In
11 the development of the Company's proposed CI&I net metering
12 service, the CI&I net metering customer would continue to
13 use a standard utility meter that measured the customer's
14 demand and energy, and a second meter installed to measure
15 the energy provided by the customer's generating facility.
16 This metering configuration provided the customer with the
17 ability to offset any energy charges with the production
18 from their on-site generation system. Additionally, it
19 enabled the collection of demand and basic load capacity
20 charges based on the customer's gross demand, measured
21 independent of the on-site generation.

22 Q. Was there support for the Company's original
23 two-meter proposal for CI&I net metering?

24 A. Yes, the Commission Staff ("Staff") supported
25 the Company's proposal, including the requirement that

1 customers pay the cost of installing a new meter base and
2 second meter. In that case, Staff contended that demand
3 charges allow the utility to recover its cost of
4 maintaining the capacity and necessary infrastructure to
5 serve a particular customer and should not be offset.¹

6 Q. Did the Commission approve the Company's
7 request to implement net metering for CI&I customers?

8 A. Yes. The Commission approved the Company's
9 request as filed in Order No. 29094.

10 Q. Have there been any changes to the Schedule 84
11 metering requirements since 2002?

12 A. Yes. In 2016, the Commission approved a
13 modification to allow for the second meter to be installed,
14 at the Company's discretion, either adjacent to or on the
15 customer's side of the point of delivery. The Company
16 proposed this change in Advice No. 16-05 to reduce the
17 barriers to participation for primary service-level
18 customers who desire to install on-site generation. The
19 existing requirement was unnecessarily limiting because, in
20 some cases, the Company understood compliance with the
21 existing two-meter requirement was cost-prohibitive.

¹ *In the Matter of the Application of Idaho Power Company for Amendments to Schedule 84 - Net Metering, Case No. IPC-E-02-04, Staff Comments at 4.*

1 Q. Please summarize the Company's request in Case
2 No IPC-E-19-15.

3 A. The Company became aware that CI&I customers
4 were relying on an expectation of the continued net monthly
5 compensation structure to calculate their potential return
6 on investment. In consideration of ongoing R&SGS
7 discussions at that time in Case No. IPC-E-18-15 to
8 comprehensively study the costs and benefits of on-site
9 generation on Idaho Power's system, as well as proper rates
10 and rate design, transitional rates, and related issues of
11 compensation for net excess energy as provided as a
12 resource to the Company, the Company was concerned that
13 certain CI&I customers may be pursuing the installation of
14 on-site generation systems that may not prove to be
15 economical under a different compensation structure.
16 Further, the growth of installed and pending capacity in
17 these customer segments, most notably within the irrigation
18 segment, had become of a magnitude that the Company felt it
19 was necessary to bring to the Commission's attention.

20 Q. What was the proposed scope of Case No. IPC-E-
21 19-15?

22 A. In its application filed in April 2019, the
23 Company recommended addressing the measurement interval and
24 compensation structure for CI&I net metering customers in
25 the newly filed case (Case No. IPC-E-19-15) due to the

1 different interconnection and metering requirements for
2 CI&I customers. The Company proposed that the value of
3 Excess Net Energy for CI&I customers be evaluated in Case
4 No. IPC-E-18-15, in which the compensation structure and
5 value for Excess Net Energy was being studied for R&SGS net
6 metering customer classes.

7 Q. How did the Commission ultimately process Case
8 No. IPC-E-19-15?

9 A. In Order No. 34335, the Commission determined
10 that the scope of IPC-E-18-15 should not be broadened to
11 include the interests of CI&I customers under Schedule 84.
12 The Commission concluded that merging IPC-E-18-15 and IPC-
13 E-19-15 would result in a disadvantage to CI&I customers by
14 not having the benefit of full participation in the IPC-E-
15 18-15 docket that had already begun. Additionally, the
16 Commission stated that it expected consistent application
17 of the principles across the dockets.²

18 Q. What was the result of Case No. IPC-E-18-15?

19 A. Parties met on January 9, 2019, for a
20 prehearing conference and subsequently held eight
21 settlement conferences that resulted in settlement of
22 issues related to the Company's Application. The

² *In the Matter of Idaho Power's Application to Evaluate Schedule 84 - Net Metering, Case No. IPC-E-19-15, Order No. 34335 at 1.*

1 Commission ultimately rejected the proposed Settlement
2 Agreement and ordered (1) Idaho Power to submit a
3 comprehensive net metering cost/benefit study informed by
4 public workshops and public input prior to proposing
5 changes to the net metering structure, and (2) existing
6 R&SGS net metering customers grandfathered into Schedules 6
7 or 8 under the rules in place as of the service date of
8 Order No. 34509, December 20, 2019.

9 Q. What grandfathering parameters were put into
10 place by the Commission for R&SGS customers in Case No.
11 IPC-E-18-15?

12 A. The Commission defined grandfathered systems
13 as existing Schedule 6 and Schedule 8 customers under the
14 rules in place as of the service date of Order No. 34509,
15 December 20, 2019. The Commission further ordered four
16 criteria that would apply for grandfathering by system: (1)
17 a customer who moves into a property with a grandfathered
18 on-site generation system will "inherit" the grandfathered
19 status of the system, (2) if a system is offline for longer
20 than six months, or is moved to another site, the
21 grandfathered system is forfeited, (3) to allow for the
22 replacement of degraded or broken panels, the customer may
23 increase the capacity of the grandfathered system by no
24 more than 10 percent of the originally installed nameplate

1 capacity or 1 kW, whichever is greater, and (4)
2 grandfathered status terminates December 20, 2045.³

3 Q. Did the decision on grandfathering in Case No.
4 IPC-E-18-15 apply to the Company's CI&I customers?

5 A. No. In Order No. 34546, the Commission stated
6 that the decision to grandfather existing customers was
7 based on the facts of that case. The Commission further
8 noted if CI&I customers in Schedule 84 are to be
9 grandfathered as of a specific date, that decision must be
10 made based on the facts presented in a separate case.

11 Q. What was the outcome of Case No. IPC-E-19-15?

12 A. In light of the orders issued in Case No. IPC-
13 E-18-15, the Company filed to withdraw its petition on
14 March 17, 2020. The Company stated that the matters
15 related to compensation structure and export credit rate
16 for Schedule 84 customers would be addressed in a new
17 future docket applying the process the Commission laid out
18 in Order Nos. 34509 and 34546.

19 **II. Schedule 84 Growth**

20 Q. What is the current level of participation in
21 Schedule 84?

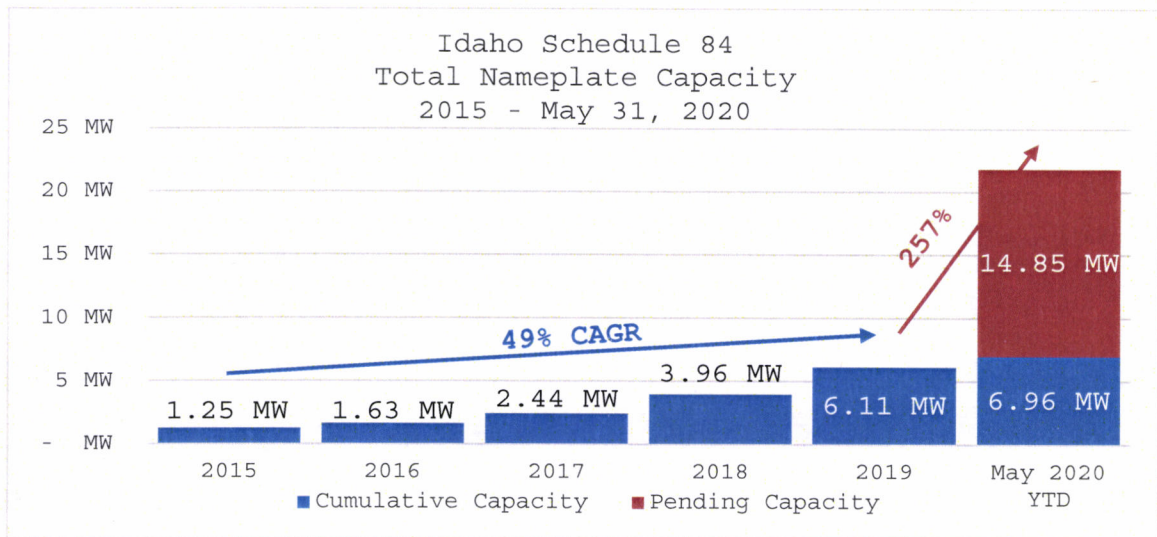
³ *In the Matter of the Petition of Idaho Power Company to Study the Costs, Benefits, and Compensation of Net Excess Energy Supplied by Customer On-Site Generation, Case No. IPC-E-18-15, Order Nos. 34509 (December 20, 2019) and 34546 (February 4, 2020).*

1 Q. What level of growth has the Company observed
2 in Schedule 84 over the last five years?

3 A. The Company has experienced increasing growth
4 in Schedule 84, as shown in Figure 2. From 2015 through
5 2019, Schedule 84 has experienced a 49 percent compound
6 annual growth rate ("CAGR") in installed generation
7 capacity. From year-end 2019 through the end of May 2020,
8 there has been a 257 percent increase in active and pending
9 Schedule 84 generation capacity.

10

Figure No. 2



11

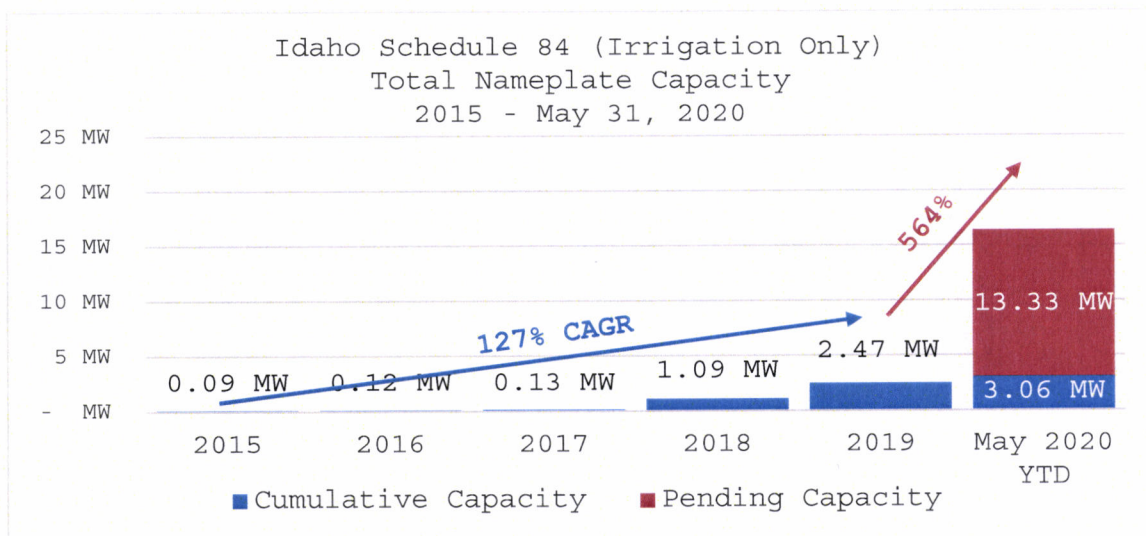
12 Recent Schedule 84 growth continues to be primarily
13 driven by the irrigation class, as shown in Figure 3, which
14 has experienced a 127 percent CAGR in installed generation
15 capacity from 2015 through 2019, with most of that growth
16 occurring in the last two years. In just the five months
17 between year-end 2019 and the end of May 2020, installed

1 and pending generation capacity in the irrigation class has
2 grown 564 percent, from 2.47 MW to 16.40 MW.

3 Based on this growth, the Company believes it is in
4 the best interest of customers, both existing and future,
5 to know to what extent they may be impacted by the outcome
6 of a future docket that results in a change to the
7 measurement interval or compensation structure applied to
8 Schedule 84. The Commission issuing a determination on
9 grandfathering in this case will provide essential
10 information for customers that have or are evaluating on-
11 site generation investments.

12

Figure No. 3



13

14

1 **III. Modifications to Metering Requirement and**
2 **Grandfathering Request**

3 Q. What specifically is the Company requesting in
4 this case?

5 A. The Company requests that the Commission
6 authorize the Company to modify the metering requirement
7 under Schedule 84 from a two-meter to single-meter
8 requirement and issue an order to grandfather existing
9 Schedule 84 customers with two-meter interconnections for a
10 period of no more than 10 years pursuant to the current
11 metering and billing provisions contained in Schedule 84 as
12 of the Effective Date. Under this proposal, all new
13 single-metered systems would not be grandfathered, and
14 therefore would be subject to any future changes to the
15 billing and compensation structure provided under Schedule
16 84 or a successor tariff offering, ordered by the
17 Commission.

18 Q. How does the Company propose to change the
19 metering requirement applicable to Schedule 84 customers?

20 A. The Company is requesting to implement a
21 single-meter interconnection requirement for all new
22 Schedule 84 customers. The proposed modification would
23 remove the two-meter requirement for the retail electric
24 service that is measured separately from a customer's on-
25 site generation. The Company has provided a revised

1 Schedule 84 tariff with the Application as Attachment No. 1
2 and requests that the Commission issue an order approving
3 it as of the Effective Date.

4 Q. Why is the Company requesting to modify the
5 metering requirement as part of this case?

6 A. In discussions with customers, installers, and
7 other stakeholders, the Company is aware of concerns
8 associated with the incremental costs and complexities that
9 exist as a result of this metering requirement. Further,
10 modification of the metering requirement and transition to
11 a single-meter requirement, simultaneous with a Commission
12 decision on grandfathering, would enable the Company to
13 holistically study the value of excess energy for all on-
14 site generation in both the R&SGS and CI&I customer
15 classes. Finally, the Company believes the modification in
16 the metering requirement provides a reasonable distinction
17 for the Commission to rely on as a basis for
18 grandfathering.

19 Q. How will modification of the metering
20 requirement impact future study of appropriate interval and
21 value of excess net energy?

22 A. The change in the metering requirement will
23 more closely align the characteristics that exist for R&SGS
24 on-site generation systems and new CI&I on-site generation
25 systems. As a result, all new on-site generation systems

1 would be similarly situated for a future study of the
2 appropriate interval and value of excess net energy for a
3 comprehensive study with public input as directed by the
4 Commission in Case No. IPC-E-18-15.

5 Q. Will the modification to a single-meter
6 interconnection requirement impact the Company's ability to
7 recover its fixed cost of service from Schedule 84
8 customers?

9 A. Yes, but likely to only a limited extent in
10 the near-term. The proposed modification to a single-meter
11 requirement for new Schedule 84 customers results in a
12 reduced ability for the Company to continue to collect a
13 portion of its fixed costs from on-site generation
14 customers through reduced demand charge revenue. The
15 impact on the collection of fixed costs, albeit relatively
16 small in the near-term, will be directly attributed to a
17 CI&I customer's ability to offset a portion of their
18 demand-related charges with a single-meter.

19 Q. Did the Company consider the impact of the
20 lost fixed cost recovery that results from the single-meter
21 proposal?

22 A. Yes. However, as highlighted in Figures 1-3,
23 much of the growth in the Schedule 84 service is contained
24 within the irrigation customer class and is primarily solar
25 generation. Due to the nature of their usage, an

1 irrigation customer has limited ability to offset their
2 demand with on-site solar generation. However, the
3 continued application of retail rate net metering, with
4 either a single or dual meter, provides the ability for
5 those customers to avoid contributions to fixed cost
6 recovery collected through the energy component of their
7 rates. Modification of the metering requirement in
8 conjunction with establishing the terms of grandfathering
9 will position the Company, stakeholders, and the Commission
10 to address any intra-class subsidy concerns caused by
11 retail rate net metering holistically for all customer
12 classes in a future case.

13 Q. Does the Company support implementing the
14 single-meter interconnection requirement absent the
15 Commission establishing grandfathering in this case?

16 A. Yes, but only under specific conditions
17 regarding grandfathering. The two-meter requirement was
18 initially established, in part, to minimize subsidies
19 inherent with retail rate net metering. While the Company
20 is agreeable to pursuing this modification, it is only
21 requesting a change in conjunction with establishing clear
22 terms for grandfathering. However, in the event the
23 Commission ultimately determines that all CI&I customers,
24 regardless of metering configuration or date of
25 interconnection, will be subject to future changes in

1 compensation structure, the Company would continue to
2 support modifying the metering requirements to a single-
3 meter configuration.

4 Q. Do the other investor-owned electric utilities
5 in Idaho require a two-meter requirement for CI&I on-site
6 generation?

7 A. No. Rocky Mountain Power and Avista only
8 require a single meter for their CI&I on-site generation
9 offering.

10 Q. On what basis does the Company propose the
11 Commission grandfather existing Schedule 84 customers?

12 A. The proposed change to a single-meter
13 interconnection requirement reasonably differentiates
14 customers who paid for additional metering infrastructure
15 from customers who will not. In consideration of the
16 Commission's grandfather findings in Order Nos. 34509 and
17 34546, it is not reasonable for a CI&I customer to assume
18 the net metering service fundamentals will remain the same
19 over the expected payback period of their investment.
20 Therefore, the Company requests the Commission issue an
21 order to grandfather existing Schedule 84 customers as of
22 the Effective Date.

23 Q. Why do you believe now is the appropriate time
24 for the Commission to issue a determination on

1 grandfathering existing Schedule 84 customers and
2 applicants with two-meter systems?

3 A. In a future docket, the Company will study
4 the compensation structure and export credit rate following
5 the process the Commission laid out in Order Nos. 34509 and
6 34546. This future study may result in changes to the
7 measurement interval and compensation structure applicable
8 to Schedule 6, 8, and 84 customers. Making a determination
9 on the terms of grandfathering for Schedule 84 customers in
10 this case establishes who would and would not be subject to
11 potential changes in the compensation structure and the
12 export credit rate.

13 Q. How does the Company propose the Commission
14 define existing Schedule 84 customers with two-meter
15 systems for purposes of grandfathering?

16 A. The Company proposes defining an existing
17 customer as a person or business who either has an approved
18 two-meter on-site generation system interconnected with
19 Idaho Power's system before the Effective Date or who has
20 submitted an application to install a two-meter on-site
21 generation system as of the Effective Date ordered by the
22 Commission. A customer that has applied for the Company's
23 net metering service before the Commission's ordered
24 Effective Date would be required to proceed to interconnect

1 their system within one year of their date of application.⁴
2 Further, any customer that submitted an application after
3 the service date of this Application would be required to
4 provide proof to the Company that a financial investment in
5 a two-meter system was made before the Commission's ordered
6 Effective Date.

7 Any person or business who submits an application
8 after the Effective Date would be required to interconnect
9 under the rules in place at that time. As more fully
10 explained below, all potential customers and known
11 installers operating in the Company's service area will
12 have received reasonable notice of the Company's request to
13 modify the meter interconnection requirements and the
14 requested date of implementation of the new requirements.

15 Q. What other criteria does the Company propose
16 to apply to the grandfathered customers?

17 A. The following criteria would apply to
18 grandfathered systems: (1) a customer who moves into a
19 property with a grandfathered on-site generation system
20 will "inherit" the grandfathered status of the system, (2)
21 if a system is offline for longer than six months, or is
22 moved to another site, the grandfathered system is

⁴ Schedule 72 provides that "applications that are not completed within one year of the initial Feasibility Review are considered expired." (Page 9)

1 forfeited, (3) to allow for the replacement of degraded or
2 broken panels, for applications received before May 1,
3 2020⁵, the customer may increase the capacity of the
4 grandfathered system by no more than 10 percent of the
5 originally installed nameplate capacity or 1 kW, whichever
6 is greater, (4) grandfathered status terminates 10 years
7 from the Commission Order date, and (5) a customer who
8 modifies their system from a two-meter interconnection to a
9 single-meter interconnection will forfeit their
10 grandfathering status.

11 The Company also proposes that any Schedule 8
12 customer who was grandfathered by the Commission in Order
13 Nos. 34509 and 34546 would maintain grandfathering status
14 as prescribed by the Commission in those orders if they
15 later exceed the energy requirements of Schedule 8 and are
16 moved to Schedule 9 and take service under Schedule 84.

17 Q. How does the Company propose to process
18 requests for system expansions?

19 A. The customer would have two choices: (1) the
20 existing grandfathered system would remain behind the
21 second customer generation meter, and the new system would

⁵ 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.

1 be placed behind the load meter, or (2) the existing and
2 new systems could be combined, following the customer
3 generation rules in place at the time, and placed behind a
4 single meter with the load.

5 Q. Please explain why the Company believes a 10-
6 year grandfathering period is appropriate in this case.

7 A. In its application in IPC-E-19-15, the Company
8 sought to suspend service under Schedule 84, primarily due
9 to concerns that customers were making decisions to install
10 on-site generation based on the assumption that retail rate
11 net metering would continue over the life of the system.
12 In Order No. 34335, the Commission ultimately declined to
13 suspend Schedule 84, stating in part:

14 The likelihood of a change in rates or
15 rate structure is not a unique situation that
16 justifies suspending a program. CI&I
17 customers are well versed in both regulatory
18 proceedings and this Commission's authority
19 and responsibilities. Indeed, the Idaho
20 Irrigation Pumpers Association has already
21 intervened. As long as solar installers and
22 other sellers of net metering systems are not
23 misrepresenting how utility rates and rate
24 structures operate, customers should have
25 sufficient understanding that a change in
26 rates and/or rate structures will impact the
27 payback period for a net metering system.

28
29 The Company believes it is reasonable to expect CI&I
30 customers, to a greater extent than R&SGS customers,
31 understood that fundamentals associated with the net
32 metering service offering would be subject to change.

1 **IV. Customer Communication**

2 Q. How will the Company notify customers of the
3 Company's proposal in this case?

4 A. The Company will notify all CI&I customers,
5 regardless of whether they have on-site generation
6 installed, of the proposed change. The Company will notify
7 existing and pending Schedule 84 customers by sending a
8 direct mail letter informing them of the proposed metering
9 change as well as the proposal to grandfather. Attachment
10 No. 2 to the Application contains a draft of the letter
11 that will be sent to existing and pending customers.

12 The Company also will send bill inserts to all CI&I
13 customers to make them aware of the Company's proposal and
14 the opportunity for public review. Attachment No. 3 to the
15 Application includes a copy of the bill insert that will be
16 sent to customers with their bills.

17 Q. How will the Company notify installers of the
18 proposed changes?

19 A. The Company will notify the installer
20 community through an email to the distribution list for its
21 periodic publication, the Customer Generation Newsletter.
22 Attachment No. 4 to the Application includes a copy of the
23 notification that will be sent to installers following the
24 filing.

1 Q. What other means will the Company use to
2 communicate with customers and installers regarding the
3 proposed change?

4 A. The Company has, concurrent with this filing,
5 updated its website to notify potential customers of the
6 proposal; the Company will maintain a list of Frequently
7 Asked Questions ("FAQs") that will remain accessible to
8 existing and potential customers, as well as installers.
9 The Company will also notify applicants and their
10 designated installer of the proposed changes when the
11 Company sends the application confirmation email.

12 **V. Conclusion**

13 Q. Please summarize the Company's request in this
14 case.

15 A. The Company requests that the Commission
16 authorize the Company to modify the metering requirement
17 under Schedule 84 from a two-meter to a single meter
18 requirement that can be implemented by December 1, 2020 (or
19 another date as ordered by the Commission). The Company
20 further requests that, simultaneous with the implementation
21 of the single-meter requirement, the Commission grandfather
22 existing customers and applicants with two-meter systems
23 under the current one-for-one net metering billing
24 construct provided for in Schedule 84 for a period of no
25 more than 10 years.

1 Approval of the Company's request will enable the
2 Company and interested stakeholders to address a study of
3 the costs and benefits of distributed on-site generation to
4 the Company's system, according to Order Nos. 34509 and
5 34546, that would apply to all new Schedule 6, Schedule 8,
6 and Schedule 84 customers.

7 Q. Does this conclude your testimony?

8 A. Yes.

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DECLARATION OF CONNIE G. ASCHENBRENNER

I, Connie G. Aschenbrenner, declare under penalty of perjury under the laws of the state of Idaho:

1. My name is Connie G. Aschenbrenner. I am employed by Idaho Power Company as the Senior Manager of Rate Design in the Regulatory Affairs Department.

2. On behalf of Idaho Power, I present this pre-filed direct testimony in this matter.

3. To the best of my knowledge, my pre-filed direct testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence before the Idaho Public Utilities Commission and is subject to penalty for perjury.

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

/s/
Connie G. Aschenbrenner