



RECEIVED

2020 DEC 29 PM 4:51

IDAHO PUBLIC  
UTILITIES COMMISSION

LISA D. NORDSTROM  
Lead Counsel  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)

December 29, 2020

**VIA ELECTRONIC FILING**

Jan Noriyuki, Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd., Bldg 8,  
Suite 201-A (83714)  
PO Box 83720  
Boise, Idaho 83720-0074

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. Noriyuki:

Attached for electronic filing, pursuant to Order No. 34602, is Idaho Power Company's Answer to Petitions for Reconsideration of Agripower Solar, LLC and Idaho Sierra Club.

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

Very truly yours,

Lisa D. Nordstrom

LDN:slb  
Attachment

LISA NORDSTROM (ISB No. 5733)  
Idaho Power Company  
1221 West Idaho Street (83702)  
P.O. Box 70  
Boise, Idaho 83707  
Telephone: (208) 388-5825  
Facsimile: (208) 388-6936  
lnordstrom@idahopower.com

Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	)	CASE NO. IPC-E-20-26
COMPANY'S APPLICATION FOR	)	
AUTHORITY TO MODIFY SCHEDULE	)	IDAHO POWER COMPANY'S
84's METERING REQUIREMENT AND TO	)	ANSWER TO PETITIONS FOR
GRANDFATHER EXISTING CUSTOMERS	)	RECONSIDERATION OF
WITH TWO METERS.	)	AGRIPOWER SOLAR, LLC AND
	)	IDAHO SIERRA CLUB

---

On December 22, 2020, Agripower Solar, LLC ("Agripower") and the Idaho Chapter of the Sierra Club ("Sierra Club") filed Petitions for Reconsideration ("Petition") requesting that the Idaho Public Utilities Commission ("Commission") reconsider the portion of Order No. 34854 regarding the cutoff date for grandfathering existing Schedule 84, Customer Energy Production Net Metering ("Schedule 84") customers. Idaho Power Company ("Idaho Power" or "Company"), in accordance with *Idaho Code* § 61-626 and RP 331.05, files this Answer to both Agripower and Sierra Club's Petitions respectfully



requesting the Commission issue an order denying Agripower and Sierra Club's Petitions for reconsideration.

Agripower and Sierra Club request the cutoff date be extended from December 1, 2020, to 30 days<sup>1</sup> and 90 days<sup>2</sup> from a final order on reconsideration, respectively. In the alternative, Agripower requests that the five (5) customers discussed in its petition be deemed as having timely applications submitted and be afforded grandfathered status under Order No. 34854.<sup>3</sup> Last, Sierra Club's Petition requests the Commission provide certain clarifications regarding the extent of a future review of program changes.<sup>4</sup>

In this Answer, Idaho Power first describes how the Company's Application, correspondence, and Commission notices and press releases provided several months' notice to both customers and installers regarding the Company's Application and the proposed December 1, 2020, effective date. Second, Idaho Power responds to Agripower's description of the events that occurred following the Commission's issuance of Order No. 34854 on December 1, 2020. Lastly, the Company explains why Sierra Club's requested clarifications regarding a future program review are unnecessary.

**I. NOTICE TO CUSTOMERS AND INSTALLERS OF THE  
DECEMBER 1, 2020 GRANDFATHER CUTOFF DATE**

Agripower seeks reconsideration of the eligibility for grandfathering based on what it claims were two "surprising" outcomes of the case: (1) to be eligible for grandfathering,

---

<sup>1</sup> Agripower Petition for Reconsideration at 1.

<sup>2</sup> Sierra Club Petition for Reconsideration and Clarification at 5.

<sup>3</sup> Agripower Petition for Reconsideration at 1.

<sup>4</sup> Sierra Club Petition for Reconsideration and Clarification at 6-7.



a fully submitted application<sup>5</sup> had to have been received by December 1, 2020, and (2) grandfathering did not apply only to the “change proposed in the Application – the change from dual meters to single meters – but rather to programmatic changes that had not yet been proposed.”<sup>6</sup> In its Petition, Sierra Club requests the Commission extend the cutoff date for legacy treatment by 90 days, stating generally that “the Company has been far less than diligent in providing its customers with timely and necessary information to make informed decisions about the risks and benefits of being a customer-generator.”<sup>7</sup> The notice arguments of Agripower and Sierra Club are without basis in fact and therefore should be denied by the Commission.

**A. All Schedule 84 Customers Received Several Months’ Notice of the December 1, 2020 Grandfather Cutoff Date from Multiple Sources.**

The Company, the Commission, and the Commission Staff’s (“Staff”) efforts in this case to notify the public of the potential impact of the Company’s application were transparent and thorough.

1. *Application:* The Company’s Application submitted on June 19, 2020, stated its request for the Commission to “grandfather existing customers and applicants with two-meter systems under the current one-for-one net metering billing construct provided for in Schedule 84.”<sup>8</sup> The Application explained that after the proposed December 1, 2020 Effective Date, “all new single-metered systems would not be

---

<sup>5</sup> As explained in the Company’s Answer to Gietzen Solar LLC’s Petition for Reconsideration submitted on December 24, 2020, the Company’s standard business practice as set forth in Schedule 72 is to consider an application fully submitted once the application form and \$100 application fee are received.

<sup>6</sup> Agripower Petition for Reconsideration at 3.

<sup>7</sup> Sierra Club Petition for Reconsideration and Clarification at 2 (emphasis in original).

<sup>8</sup> Application at 1 (emphasis added).



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."<sup>9</sup>

2. *Bill Insert Notice:* Idaho Power sent a bill insert to all Schedule 9, 19, and 24 customers, regardless of whether they have on-site generation installed, to notify them of the changes proposed to Schedule 84.<sup>10</sup> Included as Attachment 3 to the Company's Application, the bill insert notices were provided to approximately 55,000 customers between July 6 and August 4, 2020. The bill insert states that the Company's request was to "grandfather existing customers under the current compensation structure."<sup>11</sup> The notice also provided a link to the Commission's website, a phone number to contact Idaho Power, a link to the Company's customer generation webpage, and referenced Case No. IPC-E-20-26.

3. *Installer Email Notice:* An email was sent to all installers known to be doing business in the Company's service area on June 25, 2020, notifying them of the case and the requested effective date of December 1, 2020. Included as Attachment 4 to the Company's Application, the email starts with informing installers of Idaho Power's request to "grandfather all existing Schedule 84 systems under the current compensation structure."<sup>12</sup>

---

<sup>9</sup> Application at 5-6 (emphasis added).

<sup>10</sup> In Order No. 34546 issued in Case No. IPC-E-18-15, the Commission found the Company's limited communication to only current and pending on-site generation customers as insufficient, noting "the Company did not send these documents to potential on-site generation customers...potential participants who might be thinking about making a large investment in an on-site generation system."

<sup>11</sup> Application, Attachment No. 3 (emphasis added).

<sup>12</sup> Application, Attachment No. 4 (emphasis added).



4. *Commission Notices of Application:* The Notice of Application Order No. 34728 (July 17, 2020) and the Amended Notice of Application Order No. 34746 (August 5, 2020) summarized the Company's request to require "customers who sign up for Schedule 84 on or after December 1, 2020 subject to any future Commission-approved changes to the Schedule 84 billing methodology and compensation structure."<sup>13</sup>

5. *Commission Public Workshop Notice:* On September 9, 2020, the Commission issued Notice of Live-Streamed Public Workshop, which referenced the Company's application for authority to "make customers who sign up for Schedule 84 on or after December 1, 2020 subject to any future Commission approved changes to the Schedule 84 billing methodology and compensation structure, and...grandfather customers who have applied to take service under Schedule 84 before December 1, 2020 to the present terms in Schedule 84 for 10 years." (emphasis added) On September 11, 2020, the Commission issued a press release to publicize the scheduled Staff live-streamed workshop.

At the September 28, 2020 workshop, Staff provided an overview of the Company's request to (1) modify the two-meter requirement to a single meter requirement for all new customers, and (2) grandfather existing customers under the existing rate structure. Mr. Joe Goodman, the President of Agripower, ("Mr. Goodman") provided comments and asked clarifying questions at the workshop.

6. *Commission Notices of Public Hearing and Modified Procedure:* On September 4, 2020, the Commission issued Notice of Telephonic Public Hearing Order No. 34777 which referenced the Company's application for "authority to remove the two-

---

<sup>13</sup> Order No. 34728, at 1 and Order No. 34746, at 1 (emphasis added).



meter requirement for new Schedule 84 customers and to grandfather existing customers with two-meter systems under the current 1:1 monthly netting for 10 years."<sup>14</sup> On October 1, 2020, the Commission issued a press release publicizing the Commission's telephonic public hearing.

The Commission heard from at least 13 individuals (including David Havell, an installer with Agripower) at the October 13, 2020, public hearing on this matter, most of whom stated their interest was in representing agricultural customers. Several of those individuals advocated for a 25-year grandfathering period and opposed the Commission establishing a cutoff for grandfathering.

The Commission also received nearly 100 written comments in the matter, submitted before the Commission's order was issued. Mr. Goodman also submitted a written comment to the Commission on October 27, 2020, more than a month in advance of the Commission's order issued in this case. Based on the plain language of his comment, Mr. Goodman appears to have understood the Company's request in this matter quite well: he urges the Commission to implement a grandfathering period of at least 25 years "for those few irrigation net-metering customers who relied on the terms given them by Idaho Power when designing and installing their systems." Mr. Goodman also urges the Commission not to establish a cutoff date to the existing terms defined by Schedule 84 until the new net metering program is in place. These statements contradict the argument in Agripower's Petition that it was surprised and unaware of the proposed effective date for grandfathering and claims the Commission's order extends beyond what was proposed in the Company's Application.

---

<sup>14</sup> Order No. 34777 at 1 (emphasis added.)



As evidenced by these multiple forms of notice, customers and installers had several months' advance notice of the December 1, 2020 grandfather cutoff date. Although Idaho Power is sympathetic to the impacts on the specific customers who did not timely submit their applications and fees, the Company believes any inadequacies were the result of a lack of diligence rather than the lack of reasonable notice, geographic proximity, or "dumb luck"<sup>15</sup> argued by the petitioners.

**B. Idaho Power has been Diligent in its Efforts to Pursue a Comprehensive Case to Holistically Study the Costs and Benefits of On-Site Generation.**

In its Petition, Sierra Club claims that "by delaying the launch of a docket to study the costs and benefits of customer self-generation," the Company has not provided its customers with the necessary information to make informed decisions.<sup>16</sup> The Sierra Club uses this argument as a basis to suggest the cutoff date for legacy treatment should be extended by 90 days to February 1, 2021. This assertion made by Sierra Club seems to dismiss the work that went into the 16-month long case (Case No. IPC-E-18-15, in which both the Company and Sierra Club participated) that was initiated by a Company application filed less than one month after the Commission issued its final order in Case No. IPC-E-17-13. The Company sought clarification in Case No. IPC-E-18-15 to determine whether the outcome of the grandfathering decision in that case would apply to the Company's commercial, industrial, and irrigation ("CI&I") customers; however, the Commission ultimately determined that decision would be informed based on facts presented in that case.

---

<sup>15</sup> Agripower Petition for Reconsideration at 7.

<sup>16</sup> Sierra Club Petition for Reconsideration and Clarification at 2.



The Company's subsequent filings to request closure of Case No. IPC-E-19-15 and initiate Case No. IPC-E-20-26 have been timely and with an eye towards filing a comprehensive case to holistically study the value of excess energy for all CI&I customers. While recognizing customer frustration about the current lack of information to make investment decisions is legitimate, the suggestion the Company has delayed progress on these matters is without merit based on the numerous cases it has filed in recent years to resolve these complex pricing and customer equity issues.

Establishing grandfather cutoff dates for all customer classes is an important step; it will promote equity between customer classes and facilitate full participation in the net metering compensation and fixed cost cases that Idaho Power will initiate at the conclusion of this case and the on-site generation interconnection Case No. IPC-E-20-30. Idaho Power is also concerned that instead of focusing on protecting customers who have already made a financial investment, reconsideration to extend the grandfather cutoff date beyond the service date of Order No. 34584, as proposed by Agripower and Sierra Club, would undermine the future value of notice given in Commission dockets and result in the preferential treatment of certain customers.

## **II. POTENTIAL IMPACTS TO SPECIFIC CUSTOMERS**

Agripower's Petition provides five (5) specific examples of potential customer impacts related to the December 1, 2020, cutoff date in Order No. 34854. In several of the accounts, Agripower focuses on the "unknown" grandfather cutoff date as a basis for why the Commission should extend grandfathering treatment. For example, it claims on behalf of the Meyers that "neither customer, nor Agripower Solar, could have anticipated



that December 1 would be the cutoff date for legacy treatment.”<sup>17</sup> However, as more fully described above, Agripower was keenly aware of the proposed cutoff date, and each of the customers referenced had received notice of the pending case.

Agripower's Petition on behalf of the five customers is one of self-interest and not solely to protect customer investments. For example, after notifying Agripower on December 9, 2020, that Idaho Power had still not received fully submitted applications from Greg Nickell (or his lessee), in an email included as Attachment 1, the Agripower installer replied, “I figured as much. In all our hurrying, we just plain left these ones out. The good news is my lack of organization only cost us about \$3 million.” The statement made by the installer implies the customer had made no financial commitment prior to the Commission order; instead, the installer was motivated to submit an application to ensure a multi-million-dollar sale on behalf of his employer.

In its Petition, Agripower also claims – again, “upon learning of the deadline” – that Mr. Russell Schiermeier (“Mr. Schiermeier”) drove to Boise to write out nearly 100 checks for application fees, so applications for several customers would be considered fully submitted by the date of the order. Unfortunately, Agripower misrepresents that three of those application fees were intended to be submitted on behalf of Russell Patterson (“Mr. Patterson”) by claiming “Mr. Schiermeier failed to identify in the ‘memo’ field that any of these checks were for Russell Patterson’s installations.”<sup>18</sup>

To clarify for the Commission, there was no opportunity for the Company or Mr. Schiermeier to commit an oversight concerning Mr. Patterson’s installations because Mr.

---

<sup>17</sup> Agripower Petition for Reconsideration at 7.

<sup>18</sup> Agripower Petition for Reconsideration at 8.



Schiermeier intentionally wrote a meter number on each check submitted and aggregated the checks in envelopes, by customer. On each envelope, Mr. Schiermeier wrote the customer name, meter numbers, and check numbers contained within. Upon receiving an inquiry from the installer, Idaho Power provided copies of each of the envelopes to verify there were none submitted on behalf of Mr. Patterson. In a follow-up phone call with the Company on December 9, 2020, the installer admitted it was an Agripower oversight that the customer's application fees were not submitted in a timely fashion.

In its Petition, Agripower also accuses Idaho Power of refusing "to apply any of these submitted funds, even for withdrawn applicants, toward Mr. Patterson's system."<sup>19</sup> It is not common practice, nor should it be, for the Company to apply a check, written on behalf of a particular customer and a certain meter point, to an unrelated customer at the request of an installer.

Finally, it should be noted that Agripower only explicitly states a financial commitment was made on behalf of Darrell and Jordan Funk, Double Eagle Dairy;<sup>20</sup> it does not expressly state if any of the other four (4) specific examples of customer impacts had made a binding financial commitment. Idaho Power has no record that a binding financial commitment occurred. To the extent that a customer's application had not been received by Idaho Power and has not made a financial commitment by December 1, 2020, the customer would not be financially harmed by the Commission's order. Instead, a customer would know that they are subject to the currently undefined terms of the non-

---

<sup>19</sup> Agripower Petition for Reconsideration at 8.

<sup>20</sup> Idaho Power received 17 applications under the names Double Eagle Dairy, Darrell M. Funk, and Double Eagle properties between August and October 2020 that would be eligible for grandfather status if interconnected within one (1) year. An additional 28 applications were received by Idaho Power under the names Darrell M. Funk and Double Eagle Properties on December 18, 2020.



grandfathered successor program, which is what the Company believes was the intention of the Commission's order.

### **III. SIERRA CLUB'S REQUEST TO CLARIFY FUTURE PROGRAM REVIEW**

In its Petition, Sierra Club requested the Commission clarify the extent of a future program review and implies, through its requested clarification, that Idaho Power intends to limit its customers' right to self-generate.<sup>21</sup> While the Company does not believe it is necessary for the Commission to further clarify beyond its existing orders and Idaho Code § 61-119(1)'s implication that generation for one's own use is legally permissible, the Company wishes to respond to Sierra Club's Petition.

First, and most importantly, the Company reiterates its support for its customers' right to generate a portion of their energy needs. Idaho Power has supported this right since its first customer with on-site generation started taking net metering service in 1997. In fact, in 2001, after receiving feedback from potential net metering customers that the then-current provisions governing net metering service were difficult to understand and cumbersome to implement, Idaho Power voluntarily applied to the Commission to establish Schedule 84. Recently, the Company has also proactively taken steps to expand optionality to customers desiring to interconnect non-exporting systems.<sup>22</sup>

In its Petition, the Sierra Club appears to conflate Idaho Power's desire to modernize both net metering program fundamentals and pricing of exported energy with a desire to curtail a customer's right to self-generation. As it has maintained in several

---

<sup>21</sup> Sierra Club's Petition for Reconsideration and Clarification at 5.

<sup>22</sup> *In the Matter of Idaho Power Company's Application to Establish Tariff Schedule 68 – Interconnections to Customer Distributed Energy Resources*, Case No. IPC-E-20-30.



recent net metering and pricing-related cases<sup>23</sup> in front of the Commission, Idaho Power is focused on establishing practices and implementing rate designs for all customers, as well as compensation structures for customers with on-site generation, that will be fair and sustainable into the future.

Sierra Club also asks the Commission to modify its prior direction as it relates to what should be included in (or more pointedly out of) scope in the future case. In Order No. 34546 issued in Case No. IPC-E-18-15, the Commission found it reasonable that the issues for study, as presented in Table 1 to the first Staff Report issued in that case, could serve as the basis for a scoping recommendation in a future case.<sup>24</sup> This comprehensive list was developed with input from parties to Case No. IPC-E-18-15, and includes: costs to serve grid consumption, several value streams of exported energy (including those listed by Sierra Club in their Petition<sup>25</sup>), and rates and rate design. Further, the Commission affirmed in Order No. 34854 that the 100-kW limit is appropriately considered after program fundamentals (like those expected to be included in a future study) are addressed. Therefore, Idaho Power believes the Commission has previously addressed the matters identified in the Sierra Club's request such that no further clarification is necessary.

#### **IV. CONCLUSION**

Idaho Power respectfully requests the Commission issue an order denying Agripower and Sierra Club's Petitions for reconsideration and find that: (1) potential

---

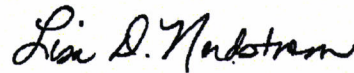
<sup>23</sup> Case Nos. IPC-E-12-27, IPC-E-17-13, IPC-E-18-15, IPC-E-18-16, IPC-E-19-15, and IPC-E-20-26.

<sup>24</sup> Order No. 34546 at 7.

<sup>25</sup> Sierra Club's Petition for Reconsideration at 6-7.

customers and installers received reasonable notice of the Company's Application and the potential changes to the Schedule 84 tariff, (2) a system with a fully submitted application (both application form and fee) physically received by the Company on or before December 1, 2020, is eligible for to be grandfathered under the one-for-one net metering billing construct in place prior to that date if interconnected within one year of their application date, and (3) further clarification requested in Sierra Club's Petition is not warranted.

DATED at Boise, Idaho, this 29<sup>th</sup> day of December 2020.



---

Lisa Nordstrom  
Attorney for Idaho Power Company



## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29<sup>th</sup> day of December, 2020, I served a true and correct copy of the within and foregoing IDAHO POWER COMPANY'S ANSWER TO PETITIONS FOR RECONSIDERATION OF AGRIPOWER SOLAR, LLC AND IDAHO SIERRA CLUB 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., Bldg No. 8  
Suite 201-A (83714)  
Boise, ID 83720-0074

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [edward.jewell@puc.idaho.gov](mailto:edward.jewell@puc.idaho.gov)

**Idaho Irrigation Pumpers Association, Inc.**

Eric L. Olsen  
Echo Hawk & Olsen, PLLC  
505 Pershing Ave., Suite 100  
PO Box 6119  
Pocatello, ID 83205

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [elo@echohawk.com](mailto:elo@echohawk.com)

Anthony Yankel  
12700 Lake Ave. Unit 2505  
Lakewood, OH 44107

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [tony@yankel.net](mailto:tony@yankel.net)

**Idaho Conservation League**

Benjamin J. Otto  
Idaho Conservation League  
710 N. 6<sup>th</sup> Street  
Boise, ID 83702

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [botto@idahoconservation.org](mailto:botto@idahoconservation.org)

**City of Boise City**

Scott Muir  
Deputy City Attorney  
Boise City Attorney's Office  
105 N. Capitol Blvd.  
PO Box 500  
Boise, ID 83701-0500

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [BoiseCityAttorney@cityofboise.org](mailto:BoiseCityAttorney@cityofboise.org)

**Micron Technology, Inc.**  
Austin Rueschhoff  
Thorvald A. Nelson  
Holland & Hart, LLP  
555 17<sup>th</sup> Street, Suite 3200  
Denver, CO 80202

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [darueschhoff@hollandhart.com](mailto:darueschhoff@hollandhart.com)  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)  
[aclee@hollandhart.com](mailto:aclee@hollandhart.com)  
[glgarganoamari@hollandhart.com](mailto:glgarganoamari@hollandhart.com)

Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID 83707

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [jswier@micron.com](mailto:jswier@micron.com)

**Idaho Sierra Club**  
Kelsey Jae  
Law for Conscious Leadership  
920 N. Clover Dr.  
Boise, ID 83703

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [kelsey@kelseyjaenunez.com](mailto:kelsey@kelseyjaenunez.com)

Lisa Young  
Mike Heckler  
Idaho Sierra Club  
503 W Franklin St.  
Boise, ID 83702

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [lisa.young@sierraclub.org](mailto:lisa.young@sierraclub.org)  
[michael.p.heckler@gmail.com](mailto:michael.p.heckler@gmail.com)

**Individual**  
Russell Schiermeier  
29393 Davis Road  
Bruneau, ID 83604

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [buyhay@gmail.com](mailto:buyhay@gmail.com)

**Gietzen Solar**  
Logan Gietzen  
120 9<sup>th</sup> Ave. S.  
Buhl, Idaho 83316

☐ Hand Delivered  
☐ U.S. Mail  
☐ Overnight Mail  
☐ FAX  
☒ Email [logan@gietzensolar.com](mailto:logan@gietzensolar.com)



**Agripower Solar, LLC**

Preston N. Carter

Blake W. Ringer

Givens Pursley LLP

601 W. Bannock St.

Boise, Idaho 83702

☐ Hand Delivered

☐ U.S. Mail

☐ Overnight Mail

☐ FAX

☒ Email [prestoncarter@givenspursley.com](mailto:prestoncarter@givenspursley.com)  
[blakeringer@givenspursley.com](mailto:blakeringer@givenspursley.com)



---

Stephanie L. Buckner,  
Executive Assistant



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

**IDAHO POWER COMPANY**

**ATTACHMENT**

**TO**

**IDAHO POWER COMPANY'S ANSWER TO PETITIONS  
FOR RECONSIDERATION OF AGRIPOWER SOLAR,  
LLC AND IDAHO SIERRA CLUB**



**From:** [Aaron Pace](#)  
**To:** [LOC\\_CG](#)  
**Subject:** [EXTERNAL]RE: New Net Metering Applications  
**Date:** Friday, December 11, 2020 1:06:58 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

---

**KEEP IDAHO POWER SECURE!** External emails may request information or contain malicious links or attachments. Verify the sender before proceeding, and check for additional warning messages below.

---

I figured as much. In all our hurrying, I just plain left these ones out.

The good news is my lack of organization only cost us about \$3 million.

**From:** LOC. CG <[CG@idahopower.com](mailto:CG@idahopower.com)>  
**Sent:** Friday, December 11, 2020 12:58 PM  
**To:** Aaron Pace <[aaron@agripowersolar.com](mailto:aaron@agripowersolar.com)>; LOC. CG <[CG@idahopower.com](mailto:CG@idahopower.com)>  
**Subject:** RE: New Net Metering Applications

Hi Aaron,  
These two were not included with the 5 we received for DC Farms.  
Thanks  
Shawn

**From:** Aaron Pace <[aaron@agripowersolar.com](mailto:aaron@agripowersolar.com)>  
**Sent:** Wednesday, December 9, 2020 9:13 AM  
**To:** LOC. CG <[CG@idahopower.com](mailto:CG@idahopower.com)>  
**Subject:** [EXTERNAL][WARNING: MESSAGE ENCRYPTED]FW: New Net Metering Applications

**KEEP IDAHO POWER SECURE!** External emails may request information or contain malicious links or attachments. Verify the sender before proceeding, and check for additional warning messages below.

---

Team CG,

Will you check to see if these applications were received along with the flurry that went in on the 1<sup>st</sup>?

Aaron

**From:** Aaron Pace  
**Sent:** Tuesday, December 1, 2020 3:08 PM  
**To:** [davidcoop@gmail.com](mailto:davidcoop@gmail.com); [greg@nickell.org](mailto:greg@nickell.org)



**Cc:** Joseph Goodman <[joe@agripowersolar.com](mailto:joe@agripowersolar.com)>; Marty Baird <[mbaird@agripowersolar.com](mailto:mbaird@agripowersolar.com)>

**Subject:** New Net Metering Applications

David,

I'm not sure if anyone has spoken to you about these yet or not, but these are net metering applications for a couple of solar installations on the farm you lease from Greg Nickell. These need to be submitted today to Idaho Power along with their \$100 check. Please scan the signed application and checks and send them to [cg@idahopower.com](mailto:cg@idahopower.com). It is preferred that the applications physically get to Idaho Power though I imagine that will be difficult. Please FedEx them to arrive tomorrow if possible.



**Aaron Pace**

Chief Data Officer

AgriPower Solar



+1 801-870-7662



[aaron@agripowersolar.com](mailto:aaron@agripowersolar.com)



[www.agripowersolar.com](http://www.agripowersolar.com)



40 W Truman Ave, Salt Lake City, UT 84115

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, re-transmission, dissemination or other use of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.

**IDAHO POWER LEGAL DISCLAIMER**

This transmission may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, re-transmission, dissemination or other use of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer.