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IDAHO PUBLIC
UTILITIES COMMISSION

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**BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER
COMPANY'S APPLICATION FOR
AUTHORITY TO MODIFY SCHEDULE 84'S
METERING REQUIREMENT AND TO
GRANDFATHER EXISTING CUSTOMERS
WITH TWO METERS

Case No. IPC-E-20-26

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

COMES NOW, the city of Boise City, herein referred to as "Boise City" and pursuant to Rule 202 of the Rules of Procedure of the Idaho Public Utility Commission (IDAPA 31.01.01.202) and, pursuant to that Notice of Telephonic Public Hearing, Notice of Modified Procedure, Order No. 34777, filed on September 4, 2020, hereby submits its formal written comments and states as follows:

1. Idaho Power Company (the "Company") has filed an Application in Case No. IPC-E-20-26. Boise City has a direct and substantial interest in the outcome of this Application as a representative of residents and businesses, as the proceeding relates to Boise City's clean energy

transition plan, Boise's Energy Future, which relies on renewable resources including onsite generation to achieve Boise City's 100% clean electricity goals.

Boise City is also directly impacted by the outcome of these proceedings at four city facilities (Bown Library!, Foothills Learning Center, Fire Station #9, Twenty Mile South Farm Administration Building) with onsite generation and net metering under Schedule 84. The short ten (10) year grandfathering timeline in the proposed Application would impact the financial considerations that were used to develop the onsite generation at these facilities. The proposed interconnection requirements would impact at least three of these facilities that currently use a two-meter interconnection.

Additionally, Boise City owns and operates the Twenty Mile South Farm ("Farm") where biosolids from our water renewal facilities are land applied. Following land application, the Farm produces numerous crops that support local and regional grain and feed markets. Crop production is supported by irrigation facilities, including Boise City's twenty-four (24) different Company irrigation service accounts with total usage of 5,614,384 kWh in 2019. Should Boise City desire to install additional net metered onsite generation facilities, these and other Boise City accounts are also directly impacted by the proposed changes.

2. On June 19, 2020, the Company filed this Application 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 M, for a period of no more than ten (10) years. (Application at 1 and 2).

3. On December 20, 2019, in Order No. 34509 (IPC-E-18-15), the Commission directed "that the Company shall submit a comprehensive study of the costs and benefits of net metering to the Commission before any further proposals to change the Company's net-metering program." Commission Order No. 34509. Boise City believes that the actions proposed herein with IPC-E-20-26 are premature, considering that this analysis remains incomplete. The Commission should defer action on the content of this Application until such time that the analysis ordered by IPC-E-18-15 is complete and has been fully vetted, analyzed by stakeholders and the public, and confirmed by the Commission.

4. The proposed modifications in the Application require the implementation of a single-meter interconnection for all new Schedule 84 customers and that existing customers with a two-meter interconnection would be grandfathered for a ten-year period (Aschenbrenner Direct at 14). Boise City recommends that Schedule 84 interconnection requirements remain flexible to allow customers an option for both a single or two-meter interconnection. While Boise City acknowledges the Company's comments and preference for a single-meter connection, some customers may see advantages to a two-meter interconnection, and therefore Boise City supports the customer's ability to choose the interconnection that best supports their system and the varying needs of their onsite generation.

5. The proposed modifications in the Application identify a grandfathering period for existing and pending schedule 84 customers for a period of ten (10) years with conditions (Aschenbrenner Direct at 20-21). Considering the Commission's decision in Order No. 34509 (IPC-E-18-15) to grandfather residential net metering customers and the substantial investments made in onsite generation systems by farmers and irrigators, Boise City requests that these

Schedule 84 customers be grandfathered indefinitely.

6. Farmers and irrigators play an important role in supporting Demand Side Management and Peak Load Reduction programs and it is important to consider the impacts that constraints to onsite generation for these customers have on all of Idaho Power's customers and projected future needs to address peak demand with additional generation. Boise City requests that the Commission consider these factors in analyzing the requested modifications in the Application.

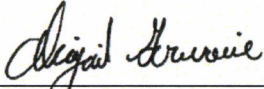
7. On August 21, 2002, Order No. 29094 (IPC-E-02-4) established two-meter interconnection requirements as well as a 100kW cap at each meter point for onsite generation for Schedule 84 customers. Since that time, Boise City is not aware of any subsequent applications filed by the Company to address the 100kW cap. Concerns with the 100kW cap were noted in testimony during the recent public comment sessions held by the Commission in this Case No. IPC-E-20-26. By contemplating updates to meter interconnection requirements for Schedule 84 customers with onsite generation, the Commission should also evaluate the 100kW cap which places economic and design constraints on these customers with onsite generation. Boise City suggests that the issue of the 100kW cap and meter configuration be evaluated in the overall net metering program analysis that was ordered by the Commission in IPC-E-18-15.

8. Boise City generally supports the comments provided by the Idaho Conservation League, Sierra Club, and Idaho Clean Energy Association.

9. In summary, Boise City requests that the Commission defer action on this docket until the comprehensive study of onsite generation, including the cost and benefits of onsite generation, rate design, and compensation for net excess energy required by Order No. 34509 (IPC-E-18-15), has been completed. Should the Commission decide not to defer action on this docket, Boise City

requests that the Commission: 1) allow customer flexibility for metering and interconnection requirements; 2) grandfather existing customers indefinitely; and 3) acknowledge the role of onsite generation towards future generation and peak demand reduction and ensure this Application does not negatively impact onsite generation customers.

DATED this 27th day of October 2020.


Abigail R. Germaine
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 27th day of October 2020, served the foregoing documents on all parties of counsel as follows:

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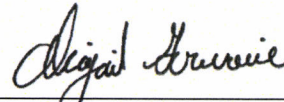
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